
FINAL DETERMINATION

PERMITTEE

Harcros Chemicals, Inc.
5132 Trenton Street
Tampa, FL 33619

PERMITTING AUTHORITY

Environmental Protection Commission of Hillsborough County
3629 Queen Palm Dr.
Tampa, Florida 33619

PROJECT

Air Permit No. 0571465-001-AF
Federally Enforceable State Operation Permit (FESOP)

This permit authorizes the operation of Harcros Chemicals, Inc., an existing chemical distribution facility. The facility receives, stores, and re-distributes numerous chemicals, including liquid muriatic acid or hydrochloric acid. As requested by the permittee, because there are no emission testing requirements and because the facility is currently in operation, this permit is being issued as a FESOP.

NOTICE AND PUBLICATION

The EPC distributed a draft minor FESOP permit package on July 13, 2018. The applicant published the Public Notice in the Tampa Bay Times on July 25, 2018. The EPCHC received the proof of publication on July 25, 2018. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

Applicant

On July 18, 2018, the EPCHC received comments via email from APTIM, on behalf of Harcros Chemicals, Inc. The following summarizes the comments and the EPC's response.

1. In Permit Condition No. A.2., the rolling 12-month limit on the muriatic acid loading to totes and drums (46,538,577 lbs) is slightly different than the amount referenced in the Technical Evaluation (46,538,918 lbs).

Response: The throughput limit listed in Specific Condition No. A.2. in the Draft Permit was a typo. The potential emissions were calculated based on the facility loading 46,538,918 pounds of muriatic acid into totes and drums. Therefore, the condition is updated as follows:

From:

A.2. Permitted Capacity: As requested by the permittee, the following throughput limitations shall apply: [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C. and Application No. 0571465-001-AF]:

- C) The amount of muriatic acid (HCl) loaded into totes and drums shall not exceed 46,538,577 pounds per twelve consecutive month period.

To:

A.2. Permitted Capacity: As requested by the permittee, the following throughput limitations shall apply: [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C. and Application No. 0571465-001-AF]:

- C) The amount of muriatic acid (HCl) loaded into totes and drums shall not exceed 46,538,918 pounds per twelve consecutive month period.

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2. In Permit Condition No. A.2., the condition contains a rolling 12-month limit on the quantity of muriatic acid loaded to totes/drums but it does not specifically contain a limit on the amount of muriatic acid loaded to tanker trucks. Was that intended or did the Agency mean for the permit to also have a limit on the amount of muriatic acid loaded to tanker truck?

Response: In the permit application, on Page 15 of EU Section 3 of 3, it states that no separate loading limitation is needed for EU 003 (Tank Truck Filling Area) because if all 110,000,000 pounds of muriatic acid were loaded into trucks, the emissions would be less than the emissions from loading 46,538,918 pounds of muriatic acid into totes and drums. Based on the information submitted in the permit application, EPC staff agreed with this determination. Therefore, there is no permit limit on the amount of material loaded into trucks, as originally requested.

CONCLUSION

The final action of the EPCHC is to issue the permit with the correction as described above.

COMMISSION

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PERMITTEE

Harcros Chemicals, Inc.
5132 Trenton Street
Tampa, FL 33619

Authorized Representative:

*John Cleary, Vice President Risk Management and
Regulatory Affairs*

0571465-001-AF

Federally Enforceable State Operation Permit

Effective Date: August 9, 2018

Renewal Application Due Date: June 10, 2023

Expiration Date: August 9, 2023

Harcros Chemicals - Tampa
Chemical Distribution Facility
Hillsborough County, Florida

PROJECT

This is the final Federally Enforceable State Operation Permit, which authorizes the operation of Harcros Chemicals, Inc., which is an existing chemical distribution facility (Standard Industrial Classification No. 5169). The existing facility is located in Hillsborough County at 5132 Trenton Street, Tampa, FL 33619. The UTM coordinates of the facility are Zone 17, 362.34 km East, and 3088.39 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.

Upon issuance of this final permit, 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 EPCHC.

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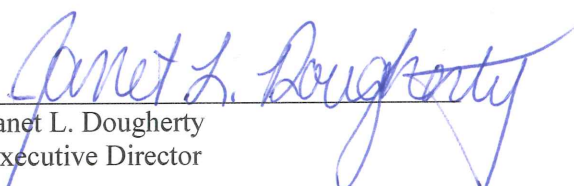
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FINAL PERMIT

Executed in Tampa, Florida.

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY



Janet L. Dougherty
Executive Director

CERTIFICATE OF SERVICE

Jason Ramsay, P.E., APTIM Environmental & Infrastructure jason.ramsay@aptim.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 Nassen 8/9/18
Clerk Date

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY DESCRIPTION

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

EU No.	Emission Unit Description
001	Storage Tanks
002	Tote and Drum Filling Area
003	Tank Truck Filling Area

Harcros Chemicals Inc. is a chemical distribution facility that receives liquid chemicals in bulk and redistributes the chemicals in various size containers to customers. Some blending of the chemicals may occur onsite but no chemical reaction takes place during the blending and/or packaging operations. The only bulk material handled onsite that contains VOC or HAP components is muriatic acid, which is another name for hydrochloric acid (HCl).

The muriatic acid is received by railcars and pumped into any of three, vertical, fixed roof storage tanks. Two of the tanks, Tank Nos. 70 and 71, have a capacity of 10,500 gallons per tank. The third tank, Tank No. 80, has a capacity of 6,400 gallons. When ready to be loaded out, the muriatic acid is pumped to either a tote and drum filling area or to a truck filling area. When loaded into totes or drums, the muriatic acid is splash loaded into various size containers using one loading spout. When loaded into tanker trucks, the tanker truck is submerged filled using one truck loading spout.

The emissions from the storage tanks and the tote and drum filling area vent to a 2,000 scfm packed bed scrubber. However, as requested by the permittee, the potential HCl emissions from the operation do not account for the use of the scrubber. The potential emissions are assumed to vent uncontrolled to the atmosphere.

The facility also stores additional bulk liquid chemicals in a total of twelve, fixed roof storage tanks. These chemicals do not emit regulated air pollutants at ambient temperatures; therefore, the handling of the chemicals does not require an air permit. In addition, the facility receives prepackaged liquid and solid chemicals. The chemicals are stored onsite and shipped offsite in the containers that they are received in. The containers are not opened onsite.

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.	001, 002, 003
<i>Local Rule Citations</i>	
Ch. 1-3, Rules of the EPCHC	001, 002, 003

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(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

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.
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.
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); and 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 EPCHC. Such permit shall be obtained prior to beginning construction or modification. In addition, the permittee shall evaluate the handling of any new material to determine if the handling of the material would require an air permit. The applicable air permit shall be obtained prior to handling the new material. [Rules 62-210.300(1), 62-212.300(1)(a), and 62-4.070(3), F.A.C.]
7. The facility shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. An objectionable odor is defined as 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. [Rules 62-210.200(Objectionable Odor), and 62-296.320(2), F.A.C.]
8. As requested by the permittee, in order to limit the potential to emit and establish the facility as a Synthetic Non-Title V Source for Hazardous Air Pollutants (HAP), the hydrochloric acid emissions shall not exceed 8.7 tons in any 12 consecutive month period. [Rules 62-4.070(3) and 62-210.200(HAPs), (Major Source), and (PTE), F.A.C.; and Application No. 0571465-001-AF]
9. 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 EPCHC. [Rule 62-4.090, F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

10. When the Environmental Protection Commission of Hillsborough County (EPC) 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 EPC in accordance with the provisions of subsection 62-297.310(10), F.A.C. [Rule 62-297.310(8)(c), F.A.C.]
11. 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 Environmental Protection Commission of Hillsborough County. All synthetic non-Title V sources shall submit a completed DEP Form 62-210.900(5) 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}
12. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air 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 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU Nos. 001, 002, and 003 – Storage Tanks; Tote, Drum, and Truck Filling Areas

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
001	Storage Tanks
002	Tote and Drum Filling Area
003	Tank Truck Filling Area

PERFORMANCE RESTRICTIONS

A.1. As requested by the permittee, the following limitations shall apply: [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C. and Application No. 0571465-001-AF]

- A) The amount of muriatic acid (HCl) received shall not exceed 110,000,000 pounds per twelve consecutive month period, which is equivalent to 11,273,000 gallons per twelve consecutive month period.
- B) The maximum concentration of the muriatic acid (HCl) handled shall not exceed 35%.
- C) The permittee is authorized to blend chemicals with no chemical reaction.

A.2. Permitted Capacity: As requested by the permittee, the following throughput limitations shall apply: [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C. and Application No. 0571465-001-AF]

- A) The total throughput for Tank Nos. 70 and 71 shall not exceed 8,640,000 gallons per twelve consecutive month period.
- B) The throughput for Tank No. 80 shall not exceed 2,633,000 gallons per twelve consecutive month period.
- C) The amount of muratic acid (HCl) loaded into totes and drums shall not exceed 46,538,918 pounds per twelve consecutive month period.

A.3. When loading tanker trucks, the trucks shall be submerged filled. [Rule 62-4.070(3), F.A.C. and Application No. 0571465-001-AF]

A.4. Hours of Operation: The hours of operation of each emission unit are not limited. [Rule 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

A.5. The permittee shall maintain records in order to ensure compliance with Specific Condition Nos. A.1. and A.2. The records shall include, as a minimum, the following information and shall be made available for inspection by the Environmental Protection Commission of Hillsborough County for at least two years. The records shall include, as a minimum: [Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

- A) Month, Year
- B) The concentration of the muriatic acid (HCl) unloaded
- C) The amount muriatic acid (HCl) unloaded from railcars
- D) The throughput for each storage tank
- E) The amount of muriatic acid (HCl) loaded into totes and drums
- F) The amount of muriatic acid (HCl) loaded into tanker trucks
- G) Twelve month rolling totals of C) through F) above

