



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

HOWCO Environmental Services, Inc.
3701 Central Avenue
St. Petersburg, Florida 33711

Air Permit No. 1030153-014-AO
Permit Expires: 03/10/2016
Air Operation Permit Revision
Add Natural Gas as a Fuel for the Oil Heater

Authorized Representative:
Mr. Tim Hagan, President

This is the final air operating permit for the revision of Air Operation Permit No. 1030153-012-AO for a used oil recycling operation at the HOWCO Environmental Services, Inc. categorized under Standard Industrial Classification Code No. 4953. The existing facility is located in Pinellas County at 843 43rd Street South in St. Petersburg, Florida. The UTM coordinates are Zone 17, 333.23 kilometers (km) East, and 3071.93 km North.

This final permit is organized by the following sections:

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Due to 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.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3), F.S. must be filed within 14 days of publication of the public notice or within 14 days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall 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.

All petitions filed under these rules shall contain:

- (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 determination;

- (c) A statement of when and how the petitioner received notice of the agency decision;
- (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, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; 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 Department'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 Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

Any party to this 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 Department of Environmental Protection in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, 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 Hillsborough County, Florida

Kelley M. Boatwright

12-21-2012

Kelley M. Boatwright
District Air Program Administrator
Southwest District

Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Permit and the Appendices) 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 persons listed below.

Mr. Tim Hagan, President, HOWCO, thagan@howcousa.com

Mr. Richard Dillen, Plant Manager, HOWCO, rdillen@howcousa.com

Mr. Kenneth E. Given, P.E., Air Testing & Consulting, ken@airtest.fdn.com

Mr. Gary Robbins, Pinellas County Air Quality Division, grobbsins@pinellascounty.org

Ms. Erin DiBacco, SWD Compliance Manager, erin.dibacco@dep.state.fl.us

Clerk Stamp

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)

(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY DESCRIPTION

Existing Facility

This facility recycles used oils. The incoming used oil is stored and then processed into on-specification industrial fuels meeting ASTM standards. These fuels are then marketed to licensed industrial burners in Florida. The facility consists of the following emissions units.

Facility ID No. 1030153	
ID No.	Emission Unit Description
001	Air Stripper No. 1
003	Oil Recycling Operation
004	Air Stripper No. 2

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no 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.
- This facility is a synthetic non-Title V source for the pollutants volatile organic compounds (VOC).

PERMIT HISTORY/AFFECTED PERMITS

This permit incorporates the terms and conditions of Air Construction Permit No. 1030153-013-AC into the facility air operating permit.

**SECTION 2. ADMINISTRATIVE REQUIREMENTS AND
FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)**

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Air Quality Division. The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division
509 East Avenue South
Clearwater, FL 33756
Telephone: 727-464-4422

3. Appendices - The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions;
 - d. Appendix D. Common Testing Requirements; and
 - e. Appendix E. "Oil Processing – Opening Thermal Valves (switching cookers 100/101)" identified as HWI-501, Rev: 2, and dated 12/7/09
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 - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

**SECTION 2. ADMINISTRATIVE REQUIREMENTS AND
FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)**

7. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority with a copy to Pinellas County Air Quality Division no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:
- a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
 - b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
 - c. copies of the most recent compliance test reports required by Specific Condition Nos. A.12., A.13., B.13., and B.14., if not previously submitted; and
 - d. copies of the most recent month of records/logs specified in Specific Condition Nos. A.14., and B.15.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

FACILITY-WIDE REQUIREMENTS

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. An objectionable odor is 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 62-296.320(2) and 62-210.200(181), F.A.C.; Pinellas County Code, Section 58-178]
9. Fugitive VOC/Organic Solvents (OS) - The permittee shall not store, pump, handle, process, load, unload, or use in any process or installation, VOC/OS or HAP without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:
- a. maintain tightly fitting cover, lids, etc. on all containers of OS/VOC/HAP when they are not being handled, tapped, etc.;
 - b. all VOC/HAP fittings, valve lines, etc. shall be properly maintained;
 - c. all VOC/HAP spills shall be attended to immediately and the waste properly disposed of, recycled, etc.;
 - d. all solvent from solvent washings (equipment clean-up) shall be directed into containers that prevent evaporation to the atmosphere; and
 - e. prevent excessive air turbulence across exposed VOC/OS.

[Rule 62-296.320(1), F.A.C.]

{Permitting Note – This condition implements Item 6 in Section 4, Appendix C (Common Conditions).}

**SECTION 2. ADMINISTRATIVE REQUIREMENTS AND
FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)**

NOTIFICATION REQUIREMENTS

10. Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test. [Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.; and Construction Permit No. 1030153-013-AC]

{ Permitting Note: The notification should also include the relevant emission unit ID No., test method to be used, and pollutants to be tested. }

RECORDS AND REPORTS

11. Annual Operating Report - On or before April 1st of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority. [Rule 62-210.370(3), F.A.C.]
12. Recordkeeping Frequency - Daily records shall be completed within 3 business days and monthly records shall be completed by the end of the following month. [Rule 62-4.070(3), F.A.C.]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU Nos. 001 and 004 - Air Stripper No. 1 and Air Stripper No. 2

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
001	Air Stripper No. 1
004	Air Stripper No. 2
<p>The facility receives contaminated water by truck that is treated by various methods then blended in holding tanks. The contaminated water is processed through two air strippers to remove VOC. <u>Air Stripper No. 1 (EU 001)</u> is an EnviroSystems Supply, Inc. Model No. V103-50 air stripper. <u>Air Stripper No. 2 (EU 004)</u> is a North East Environmental Products, Inc. Shallow Tray™ Model No. 3631 low profile air stripper. Air Stripper No. 2 is located to the East of Air Stripper No. 1. Effluent from Air Stripper No. 2 is transferred to a holding tank which discharges to Air Stripper No. 1 before finally being discharged to the city's sanitary sewer. The maximum water throughput rate to Air Stripper No. 1 is 28 gallons/minute (gpm) with a counter-current airflow of at least 1,200 actual cubic feet per minute (acfm). The operating water throughput rate to Air Stripper No. 2 is 90 gpm with a counter-current airflow of at least 1,200 acfm. Mist carry over from each air stripper is controlled by a mist eliminator located at the top of each air stripper's tower. The water flow to Air Stripper No. 1 is continuously monitored and recorded by an electronic flow sensor.</p>	

PERFORMANCE RESTRICTIONS

- A.1. Hours of Operation** - The hours of operation are not limited (8,760 hours per year) for either air stripper (EU 001 or EU 004).
[Rules 62-4.070(3) and 62-210.200 (Potential to Emit (PTE)), F.A.C.; Construction Permit No. 1030153-010-AC]
- A.2. Water Throughput Rate** - The water throughput rate to Air Stripper No. 1 and Air Stripper No. 2 shall not exceed 28.0 gallons/minute (gpm) and 90.0 gpm, respectively.
[Rule 62-296.320(1), F.A.C.; Construction Permit No. 1030153-010-AC]
- A.3. Air Flow Rates** - The minimum airflow for each Air Stripper shall be 1,200 acfm.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030153-010-AC]
- A.4. Operation Mode** - The air strippers are allowed to operate simultaneously.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030153-010-AC]
- A.5. Mist Control Mechanism** - To ensure that there is no mist carry-over impacting the surrounding area, each air stripper shall have adequately sized de-mister pads in the air stripper tower.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030153-010-AC]

EMISSIONS STANDARDS

- A.6. VOC/OS Emission Limitations** – VOC/organic solvents (OS) emissions shall not exceed the following:

Pollutant	Air Stripper No. 1 TPY	Air Stripper No.2 TPY	Total from both Air Strippers combined TPY
VOC/OS	1.0	5.0	6.0

*TPY – Tons per any consecutive 12 month period.

{Permitting Note: OS emissions are included in the total emission limitations, since the EPA Methods used to analyze the waste water, as required by Specific Condition No. A.10., do not separate VOC from the OS that are not considered VOC.}

[Rule 62-210.200 (PTE), F.A.C.; Construction Permit No. 1030153-010-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU Nos. 001 and 004 - Air Stripper No. 1 and Air Stripper No. 2

TESTING REQUIREMENTS

A.7. Stripper Air Flow Testing Requirements - The stack airflow of each air stripper shall be tested annually within 60 days prior to or on the date of May 30.
[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.; Construction Permit No. 1030153-010-AC]

A.8. Test Requirements - Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.9. Test Methods - Required tests shall be performed in accordance with the following reference methods.

Method(s)	Description of Method and Comments
1 and 2	Traverse Points and Velocity and Flow Rate

The above methods are described in Appendix A of 40 Code of Federal Regulations (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 Department.

[Rules 62-204.800 and 62-297.100, F.A.C.; Appendix A of 40 CFR 60]

A.10. VOC/OS Concentration in Wastewater Test Methods - In order to demonstrate compliance with Specific Condition No. A.6., the batch waste water throughput shall be analyzed monthly using the appropriate EPA Method such as 601, 602, 625, etc. (see 40 CFR 136.3, Table 1C) prior to entering each air stripper (influent), and after exiting (treatment) each air stripper (effluent). The results of the effluent analysis for Air Stripper No. 2 cannot be used as the analysis results for the influent to Air Stripper No. 1.
[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030153-010-AC]

MONITORING REQUIREMENTS

A.11. Water Flow Rate Monitoring - The permittee shall comply with the following:

- a. The water flow rate in gpm to Air Stripper No. 1 shall be continuously monitored and recorded on monitor's circular chart. The monitor's recordings shall be obtained from the measurements on the upstream side for Air Stripper No. 1 and the downstream side of the holding tank.
- b. The water flow rate in gpm to Air Stripper No. 2 shall be determined from each batch by manually recording the amount of water in gallons and the total time in minutes of transferring the batch of water.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030153-010-AC]

A.12. 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.
[Rule 62-297.310(8), F.A.C.]

A.13. Additional Test Report Requirements - Air Stripper test reports shall be submitted within 45 days of testing to the Compliance Authority and include the following:

- a. The associated pressure drop (delta P in inches of water).
- b. For Air Stripper No. 1 - A copy of the recorder's circular chart, which measures the wastewater flow rate for each day testing occurs.
- c. A copy of the monthly records required by Specific Condition No. A.14. for the month the tests were conducted.

[Rules 62-4.070(3), 62-297.310(8), F.A.C.; Construction Permit No. 1030153-010-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

A. EU Nos. 001 and 004 - Air Stripper No. 1 and Air Stripper No. 2

A.14. Operating and VOC/OS Emission Records: In order to document compliance with the requirements of Specific Condition Nos. A.2., A.6., A.10., and A.11., the permittee shall keep records (Batch VOC/OS Report) which contain the following information:

DAILY

- a. Facility Name, Facility ID No., Emission Unit ID No., Emission Unit Description, and Date (month/day/year).
- b. The start and end operating times, and total operating hours for each air stripper.
- c. The gallons/day of water through each air stripper. Gallons/hour of water through Air Stripper No. 1 shall be documented by the circular chart of the continuous monitor's recorder.
- d. The pressure drop (in inches of H₂O) across each of the air strippers.

MONTHLY

- e. Facility Name, Facility ID No., Emission Unit ID No., Emission Unit Description, and Date (month/year).
- f. A monthly total (hours/month) and a cumulative consecutive 12-month period total (hours/consecutive 12-month period) of air stripper operating hours for each air stripper.
- g. The concentration levels of each pollutant in the influent and effluent based on laboratory gas chromatograph results.
- h. The monthly (pounds/month) and consecutive 12-month period total (tons/most recent consecutive 12-month period) of VOC/OS emissions for each air stripper.
- i. A combined (Air Stripper No. 1 + Air Stripper No. 2) consecutive 12-month total of VOC/OS emissions (tons/most recent consecutive 12-month period).

Other supporting documentation, such as quantitative analysis of the contaminated water, and gas chromatograph results (as presented in the laboratory reports) which gives the concentration levels of each pollutant in the influent and effluent, shall also be retained and made available at the facility.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030153-010-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

B. EU 003 – Oil Recycling Operation

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
003	Oil Recycling Operation
<p>The oil recycling operation consists of one oil heater, two heated oil tanks (cookers) and a condensing unit. Waste oil is heated in the tanks to a maximum of 275 degrees Fahrenheit (°F) to remove water. The tanks are "cooked" until the residual water content is 2% or less (approximately 10 hours). Vapors are condensed using one or two cooling fans. During this process, negligible amounts of VOC are released (less than 0.0005 TPY) from a storage tank with a charcoal filter. An oil heater is used to heat the tanks. The oil heater is a Gencor Vertical Helical Coil Thermal Fluid Heater, Model DE 63S. The heater is fired with No. 2 fuel oil with a maximum sulfur content of 0.5% or reclaimed (used) fuel oil with a maximum sulfur content of 0.75%, at a maximum fuel firing rate of 302,220 gallons per any consecutive 12- month period. It can also be fired with natural gas at a maximum fuel firing rate of 54.229 million cubic feet (ft³) per any consecutive 12-month period.</p> <p>The condensing unit evaporates any gasoline in the waste oil and condenses it for reuse. VOC emissions from gasoline storage are vented through a charcoal filter for control. VOC emissions from the condensing unit are negligible (less than 0.01 TPY).</p>	

PERFORMANCE RESTRICTIONS

B.1. Hours of Operation - This emission unit is permitted for continuous operation (8,760 hours/year).
[Rule 62-210.200 (PTE), F.A.C.; Construction Permit No. 1030153-013-AC]

B.2. Authorized Fuels - The oil heater is authorized to burn the following fuels:

- a. Natural gas;
- b. No. 2 fuel oil with a maximum sulfur content of 0.5% by weight; and
- c. Reclaimed (used) fuel oil with a maximum sulfur content of 0.75% by weight.

[Rule 62-210.200 (PTE), F.A.C.; Construction Permit No. 1030153-013-AC]

B.3. Natural Gas Usage Rate – The natural gas firing rate to the oil heater shall not exceed 54.229 million ft³ per any consecutive 12-month period.

[Rule 62-210.200 (PTE), F.A.C.; Construction Permit No. 1030153-013-AC]

{Permitting Note: This corresponds to 6,190 ft³/hour which is the rate to be used during testing. See Specific Condition No. B.10.}

B.4. Fuel Oil Usage Rate - The fuel oil firing rate (No. 2 or reclaimed) to the oil heater shall not exceed 302,220 gallons per any consecutive 12-month period.

[Rule 62-210.200 (PTE), F.A.C.; Construction Permit No. 1030153-013-AC]

{Permitting Note: This corresponds to 34.5 gallons/hour which is the rate to be used during testing. See Specific Condition No. B.10.}

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

B. EU 003 – Oil Recycling Operation

B.5. Reclaimed Fuel Oil Limitations - Reclaimed (used) fuel oil fired in the oil heater shall comply with the following:

Constituent/Property	Allowable Level
Arsenic	5 ppm ¹ maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	Shall not exceed 4000 ppm ³
Flash Point	See note ⁴ below
PCB ²	Shall be less than 2 ppm ⁵

Notes:

1. Parts per million (PPM)
2. Polychlorinated biphenyl (PCB)
3. Records must be maintained on site that document that the oil fired in the heater came from non-hazardous sources in accordance with HOWCO's Used Oil Processor Permit.
4. Minimum of 100 °F flash point for delivered fuel oil and less than 100 °F flash point for on-site blended fuel oil.
5. Required to be capable of firing used oil during startup and shutdown. Firing of 2 ppm or greater PCB containing used oil is prohibited.

[Rules 62-4.070(3) and 62-710.210 F.A.C.; 40 CFR 761.20(e)(2) and (3); 40 CFR 279.11, and 40 CFR 279.60(a)(2); Construction Permit No. 1030153-013-AC]

B.6. Operation Requirements - When re-directing the oil heater's thermal oil coming from the burner to the correct processing oil tanks (cookers), the permittee shall follow the Work Instructions titled "Oil Processing – Opening Thermal Valves (switching cookers 100/101)" identified as HWI-501, Rev: 2, and dated 12/7/09 (Appendix E), unless prior written authorization from the Compliance Authority is obtained.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030153-013-AC]

EMISSIONS STANDARDS

B.7. Visible Emission Limitation - Visible emissions from the oil heater's exhaust stack shall not be equal to or greater than 20% opacity.

[Rule 62-296.320(4)(b), F.A.C.; Construction Permit No. 1030153-013-AC]

COMPLIANCE TESTING REQUIREMENTS

B.8. Visible Emission Compliance Testing Requirement - The oil heater's exhaust stack shall be tested for visible emissions at least 105 days prior to and no more than 365 days prior to the expiration date of this permit.

[Rule 62-297.310(7)(a)3., F.A.C.; Construction Permit No. 1030153-013-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

B. EU 003 – Oil Recycling Operation

B.9. Compliance Test Method - Required compliance tests shall be performed in accordance with the following reference method.

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

The above method is 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 Department.

[Rules 62-204.800 and 62-297.100, F.A.C.; Appendix A of 40 CFR 60]

B.10. Compliance Test Requirements – Fuel Firing Rate – Compliance testing shall be conducted at 90-100% of the maximum rate of 34.5 gallons/hour if firing with fuel oil or 6,190 ft³/hour if firing with natural gas. (See Specific Condition Nos. B.3. and B.4.)

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030153-013-AC]

{Permitting Note: This requirement supersedes the testing rate requirement in Appendix D.1. The remaining requirements of Appendix D (Common Testing Requirements) still apply.}

B.11. Compliance Test Requirement – Fuel Type

- a. A passing compliance test conducted when the oil heater was fired with natural gas will allow the heater to only be fired with natural gas and up to a total of 400 hours on No. 2 or reclaimed fuel oil. Within 30 days of exceeding the 400th hour of firing the heater with No. 2 or reclaimed fuel oil, a new compliance test shall be conducted with the heater being fired with reclaimed fuel oil if it was burned at any time during the 400 hour period. If reclaimed fuel oil was not burned during this time the test shall be conducted while burning No. 2 fuel oil.
- b. A passing compliance test conducted when the burner is fired with No. 2 fuel oil will allow the burner to be only fired with natural gas, No. 2 fuel oil and up to 400 hours of reclaimed fuel oil. Within 30 days of exceeding the 400th hour of firing the burner with reclaimed fuel oil, a new test shall be conducted while firing reclaimed fuel oil.
- c. A passing compliance test conducted when the burner is fired with reclaimed fuel oil will allow the burner to be fired with natural gas, No. 2 fuel oil or reclaimed fuel oil.

[Rules 62-297.310(2), 62-297.310(7)(a), and 62-297.310(8), F.A.C.; Construction Permit No. 1030153-013-AC]

MONITORING REQUIREMENTS

B.12. Fuel Oil Analysis - On-site blended reclaimed fuel oil shall be analyzed monthly using appropriate ASTM or EPA approved methods.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030153-013-AC]

RECORDS AND REPORTS

B.13. 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.

[Rule 62-297.310(8), F.A.C.]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

B. EU 003 – Oil Recycling Operation

B.14. Additional Test Report Requirements - Visible emission test reports shall be submitted within 45 days of testing to the Compliance Authority and include the following:

- a. A statement of the type of fuel fired during the test period;
- b. A statement of the actual fuel firing rate during the test period in gallons/hour or ft³/hour;
- c. Fuel oil analysis/certification of the sulfur content for the type of fuel oil used during the test period (if applicable);
- d. If reclaimed fuel oil was used during the test period, a copy of the reclaimed fuel oil's analysis/certification to document compliance with the reclaimed fuel oil specifications in Specific Condition No. A.5.; and
- e. A copy of the records required by Specific Condition No. B.15. for the month the visible emission test was conducted.

[Rules 62-297.310(8) and 62-4.070(3), F.A.C.; Construction Permit No. 1030153-013-AC]

B.15. Operating Records - In order to document compliance with the requirements of Specific Condition Nos. B.2. - B.4., the permittee shall keep the following records monthly:

- a. facility name, facility ID No., emission unit ID No., and description (Oil Recycling Operation);
- b. date (month/year);
- c. amount of natural gas used, in ft³;
- d. most recent consecutive 12- month period total amount of natural gas used in million ft³/consecutive 12- month period;
- e. amount of No. 2 fuel oil used, in gallons;
- f. most recent consecutive 12- month period total amount of No. 2 fuel oil used, in gallons/consecutive 12- month period;
- g. amount of reclaimed fuel oil used, in gallons; and
- h. most recent consecutive 12- month period total amount of reclaimed fuel oil used, in gallons/consecutive 12- month period.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030153-013-AC]

B.16. Fuel Oil Analysis – The following records shall be kept:

- a. Reclaimed fuel oil analysis reports (i.e., copies of the Certificate of Analysis) shall be kept for each delivery of reclaimed fuel oil; and
- b. Records of the sulfur content, in % by weight, of the fuel oil used in the oil heater shall be kept on either vendor provided as-shipped analysis or on analysis of as-received samples taken at the plant. The analysis shall be determined by the appropriate ASTM methods.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030153-013-AC]

B.17. Additional Fuel Oil Usage Recordkeeping - If the last visible emission compliance test was conducted when the oil heater was fired with No. 2 fuel oil, the permittee shall keep a daily record of oil heater's operating hours while firing reclaimed fuel oil, along with a cumulative total of the operating hours of using reclaimed fuel oil since the last compliance test. If the last visible emission compliance test was conducted when the oil heater was fired with natural gas, the permittee shall keep a daily record of the oil heater's operating hours while firing No. 2 fuel oil and reclaimed fuel oil, along with a cumulative total of the operating hours while burning each fuel since the last compliance test.

[Rule 62-4.070(3), F.A.C.; Construction Permit No. 1030153-013-AC]

SECTION 3. EMISSION UNIT SPECIFIC CONDITIONS (FINAL)

B. EU 003 – Oil Recycling Operation

{Permitting Note: When the cumulative operating hours of using No. 2 fuel oil and/or reclaimed fuel oil since the last compliance test exceeds 400 hours, then additional compliance testing is required per Specific Condition No. B.11.}