TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

Sea 3 of Florida, Inc.

Hillsborough County

Construction Permit

Application Number

0571217-010-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

March 19, 2013

I. Project Description

A. Applicant:

Mr. Kevin Wertman
Plant Manager
Sea-3 of Florida, Inc.
3606 Pendola Point Road
Tampa, FL 33619

B. Engineer:

Lynn Robinson, P.E.
Southern Environmental Sciences, Inc.
1204 N Wheeler St.
Plant City, FL 33563
P.E. No. 20786

C. Project and Location:

Sea-3 of Florida submitted an AC permit application to the EPC for the construction of two (2) parallel rail lines, with six (6) railcar unloading/loading stations. Each station will have two (2) arms. Up to twelve (12) railcars may have unloading/loading arms connected at any time. There will be two (2) additional rail lines for storing railcars and repositioning railcars to the unloading/loading stations. This modification will allow Sea-3 to unload/load LPG from railcars in addition to marine vessels. The facility requested a maximum of 6,000 railcars/yr for the railcar unloading/loading operation.

The project has been assigned NEDS Source Classification Code No. 4-04-001-51 for Petroleum and Solvent Evaporation, Petroleum Liquids Storage (non-Refinery), Bulk Terminals, Valves, Flanges, and Pumps. The facility has been assigned SIC Industry No. 29 - Petroleum Refining And Related Industries. The project will take place at 3606 Pendola Point Rd., Tampa, Fl 33619, UTM Coordinates 17- 360.10 East 3087.10 North.

D. Process and Controls:

Currently, Sea-3 Tampa LPG Terminal operates a refrigerated LPG storage and transfer facility. LPG in the form of HD5 Propane (HD5) or 60% propane and 40% butane (60/40 mix) is unloaded from vessels to a refrigerated LPG storage tank (22,800,000 gal) through pipeline. The facility has four (4) truck loading racks with a total of eight (8) truck loading arms. The facility is authorized to: unload a maximum of 18 marine vessels/yr; load a maximum of 75 vessels/yr from the storage tank; and load a maximum of 25,000 trucks/yr. The operation at the facility also involves three (3) boilers, which are used as water bath heaters. Emissions are controlled by utilizing best management practices.

This AC permit authorizes the construction of two (2) parallel rail lines, with six (6) railcar

unloading/loading stations. Each station will have two (2) arms. Up to twelve (12) railcars may have unloading/loading arms connected at any time. There will be two (2) additional rail lines for storing railcars and repositioning railcars to the unloading/loading stations. The railcars will be unloaded or loaded, then switched out to bring another group of railcars to the unloading/loading arms.

LPG will be unloaded from railcars to pressurized horizontal LPG storage (bullet) tanks and loaded into trucks, or into the existing refrigerated LPG storage tank (main tank). Also, LPG will be able to be loaded into the railcars from the main tank.

The construction also includes three (3) - 90,000 gallon LPG storage tanks ("bullet" tanks) in conjunction with three (3) - LPG compressors. All railcars have top connections (liquid and vapor) for unloading or loading. For unloading operations, a single liquid line is connected to the railcar liquid connection, with an Acme® fitting, for "bottom withdrawal" and a single vapor line is connected to the railcar vapor connection, with an Acme® fitting, to the "vapor space". During railcar unloading operations, the vapor line is used to pressurize the railcar vapor space with LPG vapor from the compressors which draw LPG vapor from the unloading "bullet" tank(s), and liquid LPG is thus displaced/removed from the railcar through the bottom withdrawal line and transferred to the "bullet" tank(s).

During railcar loading operations, a single liquid line is connected to the railcar vapor connection and liquid LPG at approximately 50 degrees F is transferred to the vapor space through the railcar vapor connection, thus lowering the railcar internal temperature and pressure. There is no loading arm vapor line connection to the railcar and no venting during the railcar loading procedure. (Note: The Acme® fittings are the same fittings used on the truck rack loading arms.)

The twelve (12) railcar unloading/loading stations will use 4" unloading/loading arms with liquid and vapor lines. The facility will load and unload a maximum of 6,000 railcars per year. The following will be the maximum loading/unloading/tranfer rates;

- loading from the LPG main storage tank to railcar(s): 450 gpm
- unloading from a rail car to the three (3) LPG storage tanks ("bullet" tanks): 200 gpm
- transfer from the three (3) bullet tanks to the chiller, and back to the main tank: 200 gpm
- transfer from the three (3) bullet tanks to the truck loading rack(s); 450 gpm

The following are the additional equipment associated with this construction project:

-<u>Three (3) – LPG Compressors</u>
The rail unloading compressors will draw LPG (HD5 propane) vapor from the top of the "bullet" tank(s) and compress it into the vapor spaces of the railcar(s) being unloaded. The differential pressure that will be created will cause the LPG liquid in the railcar(s) to flow to the bullet tank(s). The maximum railcar unloading rate with all three compressors in operation will be 250 GPM or 15,000 GPH.

-Three (3) – 450 gpm vertical LPG pumps

These pumps will be used to pump LPG (HD5) from the bullet tank(s), directly to the truck loading racks. Each will have a nominal capacity of 500 gpm. The demand for a pump along with the unloading bullet tank level control system will start and stop these pumps automatically.

-One (1) – 200 gpm vertical LPG pump

This pump will be used to send LPG to the chillers and back to the main tank (TK-101).

-Two (2) - LPG Chillers

An integrated chilling refrigeration system will be installed. The system will incorporate an inter-stage flash drum to optimize compression power and to accept fresh propane feed. The skid will be equipped with a lube oil system including oil pumps for injecting oil into the compressors, an oil separator for separating oil from the discharge gas, oil filters, oil coolers, and pumps which will circulate liquid propane from the receiver through the oil coolers. The other major element of the refrigeration system is the condenser. This is a large air-cooled exchanger elevated well above the receiver.

-One (1) Dehydration System

The system will consist of one (1) - LPG Vaporizer/Heater fired with natural gas or LPG; one (1) – 1,000 gallon propane storage tank: four (4) – 55-gallon drums; two (2) - dehydration towers; two (2) - condenser water pumps and one (1) - condenser with 2 condenser fans.

The dehydration system will remove water from the propane received by railcar before it is sent to the main tank. The system will use a molecular sieve adsorbent. Propane will flow at up to 200 gpm through an inlet strainer and then through one of the two molecular sieve vessels. One vessel will be on line for dehydration while the other will be regenerating, cooling, and then being placed on standby. The water content of the propane leaving the operating molecular sieve vessel will be checked by the moisture analyzer. The operating vessel will remain in operation until the analyzer reports a moisture dew point reading higher than -15°F, at which time an alarm will sound in the control room. The operators will then place the standby vessel on line. The other vessel will go off line until it is regenerated.

During the regeneration, the dehydrator recirculation pump will send 17 gpm of propane from the bullets through the dehydrator heater where it will be vaporized and heated to approximately 420 °F. The heater will be fired with propane/natural gas from either a 1000-gallon storage tank or the main natural gas supply. The hot propane will pass through the mole sieve vessel to remove moisture from the adsorbent. The moisture laden stream will be cooled and condensed in a small air cooled condenser. The condensed stream will flow through the separator vessel, where liquid water will collect below the liquid propane. The water layer will be drained from the bottom of the separator and collected in plastic drums for periodic offsite disposal.

The potential VOC emissions from the railcar unloading/loading operations were estimated to be 22.0 TPY, in addition to the current facility-wide potential VOC emissions of 23.7 TPY. The emissions occur when the unloading/loading arm is disconnected. Emissions from the railcars unloading/loading operations were calculated by estimating the amount of liquid and vaporous

propane left in the pipes during each loading/unloading operation. Fugitive emissions from the valves, flanges, compressors, pumps, pressure relief valves, and open-ended valves and lines were calculated using emission factors from EPA document No. EPA 453/R-95-017 – Protocol for Leak Emission Estimates.

A natural gas (NG) or LPG fired Vaporizer (1.2 MMBtu/hr, manufacturer/model number to be determined) will be used to remove water from the propane received by railcar before it is sent to the existing LPG storage tank. Since the Vaporizer is an external combustion heating unit (<10 MMBtu/hr) burning natural gas or propane, it can be exempt from permitting pursuant to 62-210.300(3)(a)33, F.A.C., Categorical Exemption.

E. Application Information:

Application Received: February 12, 2013
Additional Information Requested: N/A
Application Complete: February 12, 2013

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-209, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is subject to the requirements of Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C., since the project is a source of air pollution.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., since the facility is minor by state definition.

This project is not subject to the requirements of Rule 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C., since the facility is a minor source by state definition.

This project is subject to the requirements of Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards, since the operation is a source of volatile organic compounds emissions and a potential source of odors.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.470, Specific Emission Limiting and Performance Standards, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology (RACT) – VOC and NO_x Emitting Facilities, F.A.C., since there is not a specific category for this source.

This project is not subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology (RACT) - Lead, F.A.C., since there is not a specific category for this source.

This project is not subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology (RACT) – Particulate Matter, since there is no applicable source specific category in this rule.

This project is subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since it is subject to 40 CFR 60, Subpart Dc.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

III. Summary of Emissions for Emission Units Modified

Emission Unit	Actual VOC Emissions (TPY)*	Potential VOC Emissions (TPY)	Emissions Increase (TPY)
EU 007 – Railcar Unloading/Loading	n/a	22.0	n/a
Facility-wide		45.7	

- Data is not available since this is a new emission unit (EU 007).

Emissions from the railcars unloading/loading operations were calculated by estimating the amount of liquid and vaporous propane left in the pipes during each loading/unloading operation. Fugitive emissions from the valves, flanges, compressors, pumps, pressure relief valves, and open-ended valves and lines were calculated using emission factors from EPA document No. EPA 453/R-95-017 – Protocol for Leak Emission Estimates.

Inventory of Title III pollutants is estimated to be less than 10 TPY individually and less than 25 TPY collectively.

IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit for construction of the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

Mr. Kevin Wertman
Plant Manager
Sea-3 of Florida, Inc.
3606 Pendola Point Rd.
Tampa, FL 33619
_____/

File No.: 0571217-010-AC
County: Hillsborough

INTENT TO ISSUE

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, Sea-3 of Florida, Inc. applied on February 12, 2013 to the EPC for the construction of six (6) railcar unloading/loading stations with associated equipment (i.e., LPG "bullet" tanks, compressors, pumps, chillers and vaporizer). LPG will be unloaded from railcars to pressurized horizontal LPG storage (bullet) tanks and loaded into trucks, or into the existing refrigerated LPG storage tank. Also, LPG will be able to be loaded into the railcars from the existing refrigerated LPG storage tank. The facility requested a maximum of 6,000 railcars/yr for the unloading/loading operation.

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The project is not exempt from permitting procedures. The EPC has determined that an air pollution construction permit is required to commence or continue operations at the described facility.

The EPC intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 and 62-4.

Pursuant to Pursuant to Section 403.815 and 403.0872, F.S. and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of this

rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the EPC at the address or telephone number listed below. **The applicant shall provide proof of publication to the EPC, Air Permitting Section, at 3629 Queen Palm Drive, Tampa, Florida 33619 (Phone 813-627-2600 - FAX 813-627-2660) within 7 (seven) days of publication.** Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

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, 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 permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (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.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;

(b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;

(c) A statement of how and when the petitioner received notice of the EPC 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, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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 EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner,

(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any,

(c) Each rule or portion of a rule from which a variance or waiver is requested,

(d) The citation to the statute underlying (implemented by) the rule identified in (c) above,

(e) The type of action requested,

(f) The specific facts that would justify a variance or waiver for the petitioner,

(g) The reason by the variance or waiver would serve the purposes of the underlying statute (implemented by the rule), and

(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the

application of the rule would create a substantial hardship or violate principles of fairness, as each of the those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, 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 thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____

Richard D. Garrity, Ph.D.
Executive Director

cc: Lynn Robinson, P.E. – Southern Environmental Sciences, Inc. (via e-mail)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statues, with the clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
NOTICE OF INTENT TO ISSUE PERMIT

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP), gives notice of its intent to issue an air pollution permit 0571217-010-AC to Sea-3 of Florida, Inc., Tampa LPG Terminal. The applicant applied on February 12 to the EPC for the construction of two (2) parallel rail lines, with six (6) railcar unloading/loading stations with associated equipment. The facility will be allowed to unload/load LPG from railcars in addition to marine vessels. Emissions will be controlled by utilizing best management practices. Sea-3 Tampa LPG Terminal, which is a synthetic non-Title V facility, is located at 3606 Pendola Point Road, Tampa, FL 33619.

A Best Available Control Technology (BACT) determination was not required.

The EPC will issue the Final permit with the conditions of the DRAFT permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for hearing are set forth below.

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, 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 permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (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 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;

(b) The name, address, and telephone number of the petitioner, and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when petitioner received notice of the EPC 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, including the specific facts the petitioner contends warrant reversal or modification of the EPC proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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.

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

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition this order will not be effective until further order of the EPC.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Drive, Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, 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 thirty days after this order is filed with the clerk of the Department.

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Drive, Tampa, Florida 33619. The complete project file includes the proposed Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E., at the above address, or call 813-627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the proposed permit and require, if applicable, another Public Notice.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Mr. Kevin Wertman
Plant Manager
Sea-3 of Florida, Inc.
3606 Pendola Point Rd.
Tampa, FL 33619

Re: Hillsborough County - AP

Dear Mr. Wertman:

Enclosed is Permit Number 0571217-010-AC for the construction of six (6) railcar unloading/loading stations with associated equipment at a liquid petroleum gas (LPG) handling facility, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, Florida 33619; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/KRZ/krz

cc: Lynn Robinson, P.E. – Southern Environmental Sciences, Inc. (via e-mail)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statues, with the clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

PERMITTEE:
Sea-3 of Florida, Inc.
3606 Pendola Point Road
Tampa, FL 33619

PERMIT/CERTIFICATION
Permit No.: 0571217-010-AC
County: Hillsborough
Expiration Date: September 15, 2014
Project: Railcar Unloading/loading Operation

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. 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 EPC and made a part hereof and specifically described as follows:

This AC permit authorizes the construction of two (2) parallel rail lines, with six (6) railcar unloading/loading stations. Each station will have two (2) arms. Up to twelve (12) railcars may have unloading/loading arms connected at any time. There will be two (2) additional rail lines for storing railcars and repositioning railcars to the unloading/loading stations. The railcars will be unloaded or loaded, then switched out to bring another group of railcars to the unloading/loading arms. This modification will allow Sea-3 to unload/load LPG from railcars in addition to marine vessels.

LPG will be unloaded from railcars to pressurized horizontal LPG storage (bullet) tanks and loaded into trucks, or into the existing refrigerated LPG storage tank (main tank). Also, LPG will be able to be loaded into the railcars from the main tank.

The construction also includes three (3) - 90,000 gallon LPG storage tanks ("bullet" tanks) in conjunction with three (3) - LPG compressors. All railcars have top connections (liquid and vapor) for unloading or loading. For unloading operations, a single liquid line is connected to the railcar liquid connection, with an Acme® fitting, for "bottom withdrawal" and a single vapor line is connected to the railcar vapor connection, with an Acme® fitting, to the "vapor space". During railcar unloading operations, the vapor line is used to pressurize the railcar vapor space with LPG vapor from the compressors which draw LPG vapor from the unloading "bullet" tank(s), and liquid LPG is thus displaced/removed from the railcar through the bottom withdrawal line and transferred to the "bullet" tank(s).

During railcar loading operations, a single liquid line is connected to the railcar vapor connection and liquid LPG at approximately 50 degrees F is transferred to the vapor space through the railcar vapor connection, thus lowering the railcar internal temperature and pressure. There is no loading arm vapor line connection to the railcar and no venting during the railcar loading procedure. (Note: The Acme® fittings are the same fittings used on the truck rack loading arms.)

The twelve (12) railcar unloading/loading stations will use 4" unloading/loading arms with liquid and vapor lines. The facility will load and unload a maximum of 6,000 railcars per year. The following will be the maximum loading/unloading/tranfer rates;

- loading from the LPG main storage tank to railcar(s): 450 gpm
- unloading from a rail car to the three (3) LPG storage tanks ("bullet" tanks): 200 gpm
- transfer from the three (3) bullet tanks to the chiller, and back to the main tank: 200 gpm
- transfer from the three (3) bullet tanks to the truck loading rack(s); 450 gpm

The following are the additional equipment associated with this construction project:

- Three (3) – LPG Compressors
  The rail unloading compressors will draw LPG (HD5 propane) vapor from the top of the "bullet" tank(s) and compress it into the vapor spaces of the railcar(s) being unloaded. The differential pressure that will be created will cause the LPG liquid in the railcar(s) to flow to the bullet tank(s). The maximum railcar unloading rate with all three compressors in operation will be 250 GPM or 15,000 GPH.

- Three (3) – 450 gpm vertical LPG pumps
  These pumps will be used to pump LPG (HD5) from the bullet tank(s), directly to the truck loading racks. Each will have a nominal capacity of 500 gpm. The demand for a pump along with the unloading bullet tank level control system will start and stop these pumps automatically.

- One (1) – 200 gpm vertical LPG pump
  This pump will be used to send LPG to the chillers and back to the main tank (TK-101).

- Two (2) - LPG Chillers
  An integrated chilling refrigeration system will be installed. The system will incorporate an inter-stage flash drum to optimize compression power and to accept fresh propane feed. The skid will be equipped with a lube oil system including oil pumps for injecting oil into the compressors, an oil separator for separating oil from the discharge gas, oil filters, oil coolers, and pumps which will circulate liquid propane from the receiver through the oil coolers. The other major element of the refrigeration system is the condenser. This is a large air-cooled exchanger elevated well above the receiver.

- One (1) Dehydration System
  The system will consist of one (1) - LPG Vaporizer/Heater fired with natural gas or LPG; one (1) – 1,000 gallon propane storage tank: four (4) – 55-gallon drums; two (2) - dehydration towers; two (2) - condenser water pumps and one (1) - condenser with 2 condenser fans.

  The dehydration system will remove water from the propane received by railcar before it is sent to the main tank. The system will use a molecular sieve adsorbent. Propane will flow at up to 200 gpm through an inlet strainer and then through one of the two molecular sieve vessels. One vessel will be on line for dehydration while the other will be regenerating, cooling, and then being placed on standby. The water content of the propane leaving the operating molecular sieve vessel will be checked by the moisture analyzer. The operating vessel will remain in operation until the analyzer reports a moisture dew point reading higher than -15°F, at which time an alarm will sound in the control room. The operators will then place the standby vessel on line. The other vessel will go off line until it is regenerated.

  During the regeneration, the dehydrator recirculation pump will send 17 gpm of propane from

the bullets through the dehydrator heater where it will be vaporized and heated to approximately 420 °F. The heater will be fired with propane/natural gas from either a 1000-gallon storage tank or the main natural gas supply. The hot propane will pass through the mole sieve vessel to remove moisture from the adsorbent. The moisture laden stream will be cooled and condensed in a small air cooled condenser. The condensed stream will flow through the separator vessel, where liquid water will collect below the liquid propane. The water layer will be drained from the bottom of the separator and collected in plastic drums for periodic offsite disposal.

Currently, Sea-3 Tampa LPG Terminal operates a refrigerated LPG storage and transfer facility. LPG in the form of HD5 Propane (HD5) or 60% propane and 40% butane (60/40 mix) is unloaded from marine vessels to a refrigerated LPG storage tank (22,800,000 gal) through a pipeline. The facility has four (4) truck loading racks with a total of eight (8) truck loading arms. The facility is authorized to: unload a maximum of 18 marine vessels/yr; load a maximum of 75 vessels/yr from the storage tank; and load a maximum of 25,000 trucks/yr. The operation at the facility also involves three (3) boilers, which are used as water bath heaters. Emissions are controlled by utilizing best management practices.

A natural gas (NG) or LPG fired Vaporizer (1.2 MMBtu/hr) will be used to remove water from the propane received by railcar before it is sent to the existing LPG storage tank. Since the Vaporizer is an external combustion heating unit (<10 MMBtu/hr) burning natural gas or propane, it can be exempt from permitting pursuant to 62-210.300(3)(a)33, F.A.C., Categorical Exemption.

Location: 3606 Pendola Point Road, Tampa, FL 33619

UTM: 17- 360.10 E 3087.10 N NEDS NO: 1217

Emission Unit No.: 007 – Railcar Unloading/Loading Operation

Reference Permit No. 0571217-008-AO

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

4. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

5. No person shall 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.]

6. The following restrictions and limitations shall apply per twelve consecutive month period for the railcar unloading/loading operation:
[Rules 62-4.070(3), 62-212.300, F.A.C., Air Construction (AC) Permit Application submitted February 12, 2013]

A) The total number of railcars unloaded and loaded at the six (6) unloading/loading stations shall not exceed 6,000.
B) The hours of operation are not restricted.

7. In order to demonstrate compliance with Specific Condition No. 6, the permittee shall maintain a recordkeeping system 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), F.A.C. and AC Permit Application submitted February 12, 2013]

A) Date, Month, Year;
B) Number of railcars unloaded and loaded;
C) Twelve-month rolling total of B) above.

8. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7), F.A.C.]

9. 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. [Rule 62-210.700(4)]

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 may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

11. 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. Reasonable precautions shall include, but not limited to, the following:
[Rule 62-296.320(4)(c), F.A.C.]

A) Paving and maintenance of roads, parking areas and yards.
B) Exercise good housekeeping at all times.

12. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County, which includes immediately attending to all spills/waste as appropriate.
[Rule 62-296.320, F.A.C.]

13. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(203), F.A.C. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [40 CFR 60.15, Rules 62-4.070(3) and 62-210.300, F.A.C.]

A) Alteration or replacement of any equipment* or major component of such equipment.
B) Installation or addition of any equipment* which is a source of air pollution.

14. 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.]

15. The permittee must submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air

SPECIFIC CONDITIONS:

Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. [Rule 62-210.370(3), F.A.C.]

16. A minimum of two copies of an operating permit application for incorporating this construction Permit No. 0571217-010-AC into an operating permit shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of the construction or 90 days before the expiration date of this permit, whichever comes first.
[Rules 62-4.070(3) and 62-210.300(2), F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____

Richard D. Garrity, Ph.D.
Executive Director