

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION
FOR

Sea 3 of Florida, Inc.

Hillsborough County

Construction Permit

Application Number

0571217-012-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

March 13, 2014

I. Project Description

A. Applicant:

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:

On February 7, 2014, Sea-3 of Florida submitted a permit application to modify the test frequency on the emergency flare to once every 5 years, to be conducted prior to operation permit renewal.

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:

The flare system under Refrigerated LPG Storage Tank and Flare (EU 001) is an emergency control system to the compressor/refrigeration system which maintains the low temperature/pressure condition of the LPG storage tank. The open flare will be in operation for emergency purpose as protection against an over pressurization situation in the event that the tank refrigeration is lost. The facility has a 24-hour monitoring system in place, which monitors the LPG tank pressure. This monitoring system has set pressure values that trigger the operation of the flare and also the opening of the pressure relief valves located at the top of the tank, which would be a worst case situation. The tank's normal pressure can range between 0.8 and 1.26 psig. In the event that the tank pressure reaches 1.8 psig, a valve will open in order to vent LPG to the flare. The tank is also equipped with six other pressure relief valves that vent directly to the atmosphere, in order to prevent a catastrophic tank failure, if venting to the flare alone is insufficient to maintain the tank pressure at a safe level. This is set to occur in the event that the tank pressure reaches 2.2 psig.

According to Sea-3 the flare is seldom operated for pressure control purposes, and therefore, the annual flare test is an economic burden to the facility since it requires the burning of LPG fuel just to perform the test. According to the facility, the overall cost of testing the flare is approximately \$13,500 based on the last test conducted on September 12, 2012. Of that total cost, roughly \$8,000 was for the LPG that had to be released from the tank to be burned in the flare solely to do the tests. That amount represents 11,370 gallons of LPG burned, solely for the flare tests, which could have otherwise been sold to Sea-3 customers. For reference, the typical LPG tanker truck holds roughly 9,000 gallons.

Se-3 is a synthetic minor facility with a VOC potential to emit estimated at 24.5 TPY. The LPG tank is subject to 40 CFR 60, Subpart Kb [Standards of Performance for Volatile Organic Liquid Storage Vessels]. Based on EPA's determination dated March 2, 1999, since the flare is used as protection against an overpressure situation in the event that the tank refrigeration is lost, the flare and the piping constitute a closed vent system and control device and under the provisions of 40 CFR 60.112b(a)(3)(ii), the flare must meet the operating specifications promulgated under 40 CFR 60.18. In accordance with 40 CFR 60.8(a), the flare requires an initial performance test. Sea-3 not only has performed an initial performance test, but also has conducted several annual tests, all of which have demonstrated compliance 40 CFR 60.18. In accordance with Rule 62-297.310(7)(a)3., F.A.C., the owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Therefore, based on this review, this permit will revise the testing condition to require that the flare be tested once every five years, prior to renewal.

Based on our review and considering the economic impact attributed to the operation and testing frequency on the flare, EPC staff agrees to make the change as requested.

E. Application Information:

Application Received: February 7, 2014

Additional Information Requested: N/A

Application Complete: February 7, 2014

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 a synthetic minor source 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 synthetic 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, F.A.C., since the facility's allowable particulate matter emissions are less than 15 tons per year and 5 pounds per hour.

This project is subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since the LPG storage tank is subject to 40 CFR 60, Subpart Kb and the flare is subject to 40 CFR 60.18.

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

The facility-wide PTE for VOC emissions are 24.5 TPY, which have been estimated from the LPG ship/barge unloading and truck/barge loading operations, as well as fugitive emissions from valves, flanges, compressors, pumps, and lines. PM and SO₂ emissions are estimated from the (3) boilers, which are limited by firing the boilers exclusively on LPG, which is considered to be BACT.

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:

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

File No.: 0571217-012-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 7, 2014 to the EPC to modify the test frequency on the emergency flare unit to once every 5 years prior to the operation permit renewal due to the economic impact from the annual flare testing requirement. Sea-3 Tampa LPG Terminal is located at 3606 Pendola Point Road, Tampa, FL 33619.

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 Statutes, 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 Statutes, 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 0571217-012-AC to Sea-3 of Florida, Inc., Tampa LPG Terminal. The applicant applied on February 7, 2014 to the EPC to modify the test frequency on the emergency flare unit to once every 5 years. 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 Statutes, 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

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 0571217-012-AC for the modification of the testing frequency for the emergency flare system, 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 Statutes, 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.: 0571217-012-AC
County: Hillsborough
Expiration Date: March 13, 2015
Project: Modification – Flare Testing Frequency

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-209, 62-210, 62-212, 62-272, 62-275, 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 of hereof and specifically described as follows:

This permit modifies the test frequency of the flare performance tests (velocity, gas heating value, and Method 22 visible emissions), all to once every 5 years, to be conducted prior to permit renewal. The flare system is an emergency control system to the compressor/refrigeration system. The flare is seldom operated for pressure control purposes for the LPG tank and the cost of testing the flare has a significant economic impact on the facility.

Sea-3 of Florida, Tampa LPG Terminal, operates a refrigerated liquid petroleum gas (LPG) storage and transfer facility. LPG is unloaded from ships using one (1) liquid unloading arm and one (1) vapor arm. The LPG is transferred from the ship to a refrigerated LPG storage tank via pipeline. The tank has a 22,800,000 gallon capacity and is controlled at a pressure just above atmospheric pressure by a propane refrigeration unit. The unit compresses and re-condenses boil-off vapor from the propane storage tank and then returns the condensed vapor back to the LPG storage tank. LPG is loaded into trucks from the storage tank via four (4) truck loading racks as a liquid after it has been odorized with Ethyl Mercaptain to give it a cabbage type smell. Each rack has two (2) loading arms, for a total of eight (8). The facility can unload a maximum of 18 ships per year. Also, the facility can load LPG up to 75 barges per year through a new pipeline from the storage tank, and a maximum of 25,000 trucks per year.

The LPG storage tank has an emergency control valve to route vapors to an open flare as protection against an over pressurization situation in the event that the tank refrigeration is lost. This valve is set to begin venting to the flare once the tank pressure reaches 1.8 pounds per square inch gauge pressure (psig). The tank is also equipped with six other pressure relief valves that vent directly to the atmosphere in the event of a catastrophic tank failure and venting to the flare alone is insufficient to maintain the tank pressure at a safe level. These pressure relief valves are set to open at various pressures in the range of 2.0 to 2.2 psig and rupture disks are installed downstream of the emergency relief valves.

The operation at the facility also involves three boilers. Two of the boilers are manufactured by Algas-SDI, Inc and the maximum design heat input rate of each of the Algas-SDI, Inc boiler is 13.3 MMBtu/hr. The third boiler is a Cleaver Brooks, Model No. 4WI-700-805-I25 boiler, which has a maximum design heat

input rate of 33.5 MMBtu/hr. The boilers are used as water bath heaters. The propane from the refrigerated storage tank is heated to 50 °F by the boilers before being loaded into tank trucks/barges.

PM and SO₂ emissions from the (3) boilers are limited by firing the boilers exclusively on LPG, which is considered to be BACT, and the boilers are not subject to 40 CFR 60, Subpart Dc (Edition 7/1/08) since they only combust propane gas, which is not a fuel regulated in the Subpart. VOC emissions from this facility are generated from the LPG ship/barge unloading and truck/barge loading operations, as well as fugitive emissions from valves, flanges, compressors, pumps, pressure relief valves, and open-ended valves and lines. The facility-wide PTE for VOC emissions are 24.5 TPY.

The refrigerated LPG storage tank is subject to 40 CFR 60 Subpart Kb. The boilers are subject to an opacity standard of 20% as stipulated in Rule 62-296.406(1), F.A.C. The facility is subject to Rule 62-296.320, F.A.C. The flare under EU 001 (Refrigerated LPG Storage Tank and Flare) is subject to 40 CFR 60.112b(a)(3)(ii) and 60.18(f).

Location: 3606 Pendola Point Rd., Tampa, FL 33619

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

Emission Unit Nos.: 001 - Refrigerated LPG Storage Tank and Flare
 002 - Ship Unloading
 003 - Two Algas-SDI, Inc Boilers (13.3 MMBtu/hr each)
 004 - Cleaver Brooks Boiler (33.5 MMBtu/hr)
 005 - Truck Loading
 006 – Barge Loading

Reference Permit No.: 0571217-008-AO

PERMITTEE:
Sea-3 of Florida, Inc.

PERMIT/CERTIFICATION NO.: 0571217-012-AC
PROJECT: Modification – Flare Testing Frequency

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 particulate matter and sulfur dioxide emissions from the two Algas-SDI boilers and the Cleaver Brooks Boiler shall be limited by firing the boilers exclusively on LPG. [Rule 62-296.406, F.A.C. and BACT Determinations dated May 24, 1999 and March 1, 2007]
7. Visible emissions from all three boilers shall not exceed 20 percent opacity, except for one six minute period per hour of not more than 27 percent opacity, or one two-minute per hour during which opacity shall not exceed 40 percent. [Rules 62-4.070(3) and 62-296.406(1), F.A.C.]
8. [Reserved.]
9. The flare shall be designed for and operated with no visible emissions as determined by the methods specified in 40 CFR 60.18(f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. [40 CFR 60.18 and Rule 62-4.070(3), F.A.C.]
10. The flare shall be operated with a flame present at all times, as determined by the methods specified in 40 CFR 60.18 (f). [40 CFR 60.18 and Rule 62-4.070(3), F.A.C.]
11. The following restrictions and limitations shall apply per twelve consecutive month period for the ship/barge unloading, truck/barge loading and the boilers operation:
[Rules 62-4.070(3), 62-212.300, F.A.C., BACT Determination dated March 1, 2007 and Permit No. 0571217-006-AC]
 - A) The number of ships unloaded shall not exceed 18.
 - B) The total number of trucks loaded at the four (4) loading racks shall not exceed 25,000.
 - C) The number of barges loaded shall not exceed 75.

PERMITTEE:
Sea-3 of Florida, Inc.

PERMIT/CERTIFICATION NO.: 0571217-012-AC
PROJECT: Modification – Flare Testing Frequency

SPECIFIC CONDITIONS:

- D) Fuel type for the boilers: LPG (propane) only.
- E) Maximum heat input for the Cleaver Brooks Boilers: 33.5 MMBtu/hr.
- F) Maximum heat input of each of the two Algas-SDI, Inc: 13.3 MMBtu/hr.
- G) Total maximum fuel usage for the Algas-SDI boilers: 2,10,000 gallons per 12 consecutive month period.
- H) Total maximum fuel usage for the Cleaver-Brooks boiler: 3,200,000 gallons per 12 consecutive month period.
- I) All products of combustion must vent through the stack.
- J) The hours of operation are not restricted.

12. In order to demonstrate compliance with Specific Condition No. 11, 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:
[40 CFR 60.48c.(g) and (i), Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

- A) Date, Month, Year;
- B) Number of ships/barges unloaded;
- C) Number of trucks/barges loaded;
- D) Total fuel usage for each boiler (gallons);
- E) Twelve-month rolling total of B), C) and D) above.

13. The permittee shall maintain the following records for the LPG storage tank for the most recent three- year period. The records shall be made available for inspection by any local, state, or federal air pollution agency. The records shall include, but not limited to, the following:
[40 CFR 60.116b, Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

- A) The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR 60.116b(b)]
- B) The permittee shall maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40 CFR 60.116b(c)]
- C) Available data on the storage temperature may be used to determine the maximum true vapor pressure. The maximum true vapor pressure is calculated based upon the highest expected calendar month average of the storage temperature. [40 CFR 60.116b(e)(1) and (e)(3)]
- D) The vapor pressure:
 - i) May be obtained from standard reference tests; or
 - ii) Determined by ASTM Method D2879-83 (incorporated by reference – see 40 CFR 60.17);
or
 - iii) Measured by an appropriate method approved by the Administrator; or
 - iv) Calculated by an appropriate method approved by the Administrator.

PERMITTEE:
Sea-3 of Florida, Inc.

PERMIT/CERTIFICATION NO.: 0571217-012-AC
PROJECT: Modification – Flare Testing Frequency

SPECIFIC CONDITIONS:

14. The permittee shall maintain the following records for the flare for the most recent three-year period. The records shall be made available for inspection by any local, state, or federal air pollution agency. The records shall include, but not limited to, the following:
[40 CFR 60.115b, Rules 62-4.070(3) and 62-4.160, F.A.C. and]

- A) All periods of operation during which the flare pilot flame is absent.
- B) Submit semiannual reports of all periods recorded under A) above in which the pilot flame was absent.

15. In order to demonstrate a closed vent system and control device which is operated to reduce inlet VOC emissions from the LPG storage tank and refrigeration system by 95% or greater, the permittee shall have rupture disks installed downstream of the six LPG tank emergency relief valves.
[62-4.070(3), F.A.C.]

16. Test all three boilers for visible emissions once per federal fiscal year (October 1 – September 30) with a target date of September 1, and submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing.
[Rule 62-297.310(7), F.A.C.]

17. Test the flare for visible emissions, once every 5 years prior to the renewal of the operating permit, and submit 2 copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. Testing shall be conducted no later than 120 days from the expiration date of the renewal operating permit. Testing procedures shall be consistent with the requirements of 40 CFR 60 and Rule 62-297.310, F.A.C.
[40 CFR 60.18 and EPA letter received March 4, 1999 and Construction Permit Application submitted February 7, 2014]

18. Test the flare in accordance with 40 CFR 60.18 requirements, once every 5 years prior to the renewal of the operating permit, and submit 2 copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. Testing shall be conducted no later than 120 days from the expiration date of the renewal operating permit. Testing procedures shall be consistent with the requirements of 40 CFR 60 and Rule 62-297.310, F.A.C.
[40 CFR 60.18 and EPA letter received March 4, 1999 and Construction Permit Application submitted February 7, 2014]

19. Compliance with Specific Condition No. 7 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The EPA Method 9 test observation period on the boiler shall be at least thirty (30) minutes in duration and shall be read at the point of highest opacity associated with the activity. [40 CFR 60.11(b), Rule 62-297.310(4)(a)2., F.A.C.]

20. Compliance with Specific Condition No. 9 shall be determined using EPA Method 22 contained in 40 CFR 60, Appendix A adopted by reference in Rule 62-297, F.A.C. The EPA Method 22 observation period shall be at least 2 hours in duration. [40 CFR 60.18]

PERMITTEE:
Sea-3 of Florida, Inc.

PERMIT/CERTIFICATION NO.: 0571217-012-AC
PROJECT: Modification – Flare Testing Frequency

SPECIFIC CONDITIONS:

21. [Reserved.]

22. Compliance testing of the boilers must be accomplished during a period when it is cycling up to a normal high firing rate, or is continuously operated at capacity. Capacity is defined as 90-100% of rated capacity of 33.5 MMBtu/hr for the Cleaver Brooks, Model No. CB-700-800, boiler and 13.3 MMBtu/hr for the Algas-SDI, boilers. If it is impracticable to test at capacity, then the boiler may be tested at less than capacity; in this case subsequent operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. The permittee shall submit a statement of the operating mode as part of the compliance test. Failure to submit an operation mode statement or operating at conditions which do not reflect the normal operating conditions may invalidate the data. [Rule 62-4.070(3), F.A.C.]

23. 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.]

24. 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)]

25. 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.]

26. 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.

PERMITTEE:
Sea-3 of Florida, Inc.

PERMIT/CERTIFICATION NO.: 0571217-012-AC
PROJECT: Modification – Flare Testing Frequency

SPECIFIC CONDITIONS:

27. 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.]

28. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: [40 CFR 68.10(a)]

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

29. 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.

30. 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.]

31. 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 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.]

PERMITTEE:
Sea-3 of Florida, Inc.

PERMIT/CERTIFICATION NO.: 0571217-012-AC
PROJECT: Modification – Flare Testing Frequency

SPECIFIC CONDITIONS:

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

