FINAL DETERMINATION

FOR

Sea 3 of Florida, Inc.

Hillsborough County

Construction Permit

Application Number

0571217-012-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

April 15, 2014

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on March 13, 2014 that included Intent to Issue Air Construction (AC) Permit No. 0571217-012-AC to Sea-3 of Florida, Inc., Tampa LPG Terminal, located at 3606 Pendola Point Road, Tampa, FL 33619.

This AC 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.

The Public Notice of Intent to Issue was published on March 23, 2014 in the Tampa Bay Times.

No comments have ever received since the Intent was published.

The final action of the Environmental Protection Commission of Hillsborough County is to issue the final permit. Also, since there are no testing requirements associated with the modification, an operating permit revision, Permit No. 0571217-013-AO, will be issued concurrently with this AC permit to incorporate the change made on testing frequency on the flare.

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 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.: 0571217-012-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 ºF 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 and the flare, 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 24.7 TPY. This includes worst case emissions from the flare, which were estimated to be 0.2 TPY, assuming that 35,000 gallons of LPG fuel are burned at the flare.

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

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.

SPECIFIC CONDITIONS:

D) Fuel type for the boilers: LPG (propane) only.
E) Maximum heat input for the Cleaver Brooks Boilers: 33.5 MMBtuU/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.

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]

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.

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