



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
APRIL 30, 1996

Virginia B. Wetherell
Secretary

Brian Gebbia
Plant Manager
Air Products and Chemicals, Incorporated
4575 Highway 90 East
Pace, Florida 32571

FILE COPY

Dear Mr. Gebbia:

This letter is intended to make administrative corrections to permit 1130004003AC constructing three internal floating roofs with double wiper seals on three methanol storage tanks.

By this letter permit 1130004003AC is amended as follows:

Specific Condition No. 6 is changed from:

6. Visually inspect the internal floating roofs and the secondary seals through manholes and roof hatches on each fixed roof at least once every twelve months, commencing twelve months after April 22, 1997. Visually inspect each internal floating roof, the primary seals, the secondary seals, gaskets, slotted membranes and sleeve seals (if any) each time a vessel is emptied and degassed and at least once every 10 years after April 22, 1997.

to:

6. Visually inspect each internal floating roof, the primary seals, the secondary seals, gaskets, slotted membranes and sleeve seals (if any) each time a vessel is emptied and degassed and at least once every 5 years after April 22, 1997.

All other Specific Conditions of this permit remain in effect.

This letter shall be attached to and made part of permit 1130004003AC.

If you have any questions or comments, please contact Rick Prusa of this office at (904) 444-8364.

Sincerely,

Ed K. Middleswart, P.E.
Program Administrator
Air Resource Management

EKM:rpk
cc: T. R. Knepper, P.E., Air Products



Department of Environmental Protection **FILE COPY**

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Secretary

ENTERED

MAY 21 1996

PERMITTEE:

Air Products and Chemicals, Inc.

AIRS I.D. Number: 1130004
Air Permit Number: 1130004003AC
Emission Unit: 029
Date of Issue: March 26, 1996
Expiration Date: March 26, 2001
County: Santa Rosa
Project: Methanol Storage Tanks

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 62-296, 62-297 and 62-4. The above named applicant, hereinafter called 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 Department and made a part hereof and specifically described as follows:

Construction of internal floating roof with double wiper seals in three Methanol Storage Tanks, TK-53407 (Field Storage), TK-53405 (Big Crude), and TK-53401B (North Storage). Methanol emissions are reduced from 25 tons per year to less than 1 ton per year.

Located south of U.S.90, east of Pace, Santa Rosa County.

1130004003AC

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. [FAC Rule 62-4.160]
2. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during the life of this permit. Projects beyond one year require annual status reports. [FAC Rule 62-4.030]

Operation

3. The maximum allowable operating rate is 45,315 (100% basis) pounds of methanol produced per hour. This is the operating rate at which compliance with standards shall be demonstrated. This allowable operating rate is a function of catalyst life which varies capacity up to 10%. [FAC Rule 62-4.070, FAC Rule 62-296.320(1)(a)]
4. The Methanol Storage Tanks may operate up to 8760 hours per year. [FAC Rule 62-4.070 and construction application]
5. Operate and maintain internal floating roofs for three methanol storage tanks, TK-53401B(North Storage), TK-53405 (Big Crude) and TK-53407 (Field Storage). Each internal floating roof shall float on the liquid surface at all times except during the initial fill, when a vessel has been completely emptied and degassed, and prior to being refilled. The process of filling, emptying, or refilling each tank shall be continuous and shall be accomplished as quickly as possible. Each internal floating roof shall be equipped with two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. Automatic bleeder vents are to be closed at all times except when a roof is being floated off or is being landed on the leg supports. Sample wells must have a slit fabric covering over at least 90% of the opening. Each automatic bleeder and rim space vent shall be gasketed and each penetration of a roof for ladder access or column supports must be equipped with a sliding gasketed cover. [FAC Rule 62-296.820, 40CFR63.119]
6. Visually inspect the internal floating roofs and the secondary seals through manholes and roof hatches on each fixed roof at least once every twelve months, commencing twelve months after April 22, 1997. Visually inspect each internal floating roof, the

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primary seals, the secondary seals, gaskets, slotted membranes and sleeve seals (if any) each time a vessel is emptied and degassed and at least once every 10 years after April 22, 1997. If during the annual external visual inspection, an internal floating roof is not resting on the leg supports; or there is liquid on the floating roof; or the seal is detached; or there are holes or tears in the seal fabric; or there are visible gaps between the seal and the wall of a storage vessel; repairs to the equipment shall be made within 45 days. If repairs cannot be made within 45 days and the vessel cannot be emptied within 45 days, up to two extensions of 30 days each may be utilized provided that documentation of the decision to use an extension is maintained which describes the equipment failure, which documents that alternative storage capacity is not available and which includes a schedule of actions that will ensure that equipment will be repaired or that the vessel will be emptied as soon as possible. Except in the event of an unplanned inspection, the Department will be notified in writing 30 days in advance of refilling the vessel. In the event of an unplanned inspection, the Department will be notified 7 days in advance and such notification may be by telephone followed up in writing, documenting why the inspection was unplanned. If during the internal visual inspection, an internal floating roof has defects; or the primary seal has holes, tears or other openings in the seal or seal fabric; or the gaskets no longer close off the liquid surface from the atmosphere; or the slotted membrane has more than 10% open area; repairs shall be made before the vessel is refilled. [FAC Rule 62-296.820, 40CFR 63.120]

7. The Initial Notification, Implementation Plan, Notification of Compliance Status and periodic reports are required to be submitted to the Department. The periodic reports are to include a summary of the results of each internal or external inspection conducted in which a failure was detected with the date of the inspection, identification of the storage vessel in which a failure was detected and a description of the failure. Also describe the nature of and date the repair was made or the date the storage vessel was emptied. If an extension was utilized, include the documentation required in Specific Condition 2. [FAC Rule 62-296.820, 40CFR 63.151 & 152]

8. Records showing each tank's dimensions and capacities and all required reports shall be kept for a minimum of 3 years and be available for Department inspection. [FAC Rule 62-296.820, 40CFR 63.123]

9. A startup/malfunction/shutdown plan shall be posted on site, updated and made available for Department inspection. The plan shall include but not be limited to procedures for startup/shutdown, malfunctions and bypasses. The initial plan shall be submitted to the Department within 90 days of completion of construction. Actions taken inconsistent with the plan shall be reported to the Department within two working days with written notification within seven days. [FAC Rule 62-296.820]

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SPECIFIC CONDITIONS:

10. No objectionable odors shall be allowed off plant property. If the Department determines the facility is emitting objectionable odors, the Permittee shall submit an odor remediation plan within 45 days of receipt of written notification from the Department. The plan shall include, but not be limited to, dispersion modeling analysis, strategies to reduce odorous chemicals utilization, and modifications of manufacturing production cycles, manufacturing methods and/or plant exhaust systems. [FAC Rule 62-296.320(2)]

Administrative

11. An annual operation report (DEP Form 62-210.990(5)) shall be submitted by March 1st of each year. A copy of the form and instructions may be obtained from the Department of Environmental Protection, Northwest District, Air Resources Management Program, (904) 444-8364. [FAC Rule 62-210.370]

12. A major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3900. [FAC Rule 17-213]

13. The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of this project. Upon completion the engineer shall inspect for conformity to the permit application and associated documents and submit DEP Form 62.210.900(1) for major sources and 62-210.900(2) for minor sources. The application, compliance test report and appropriate fee when required are to be submitted before the expiration of this construction permit and within 75 days after completion of construction if the permittee desires to continue operation. [FAC Rule 62-4.050 and 62-210.300]

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SPECIFIC CONDITIONS:

14. The permanent source identification number for this point source is 1130004029. Please cite the appropriate number on all test reports and other correspondence specific to a permitted point source. [FAC Rule 62-297.570]

15. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8364, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 444-8364 during normal working hours. [FAC Rule 62-210.700]

Expiration Date:

March 26, 2001

Issued this 26th day of March,
1996.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



ED K. MIDDLESWART, P.E.
Air Program Administrator

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of this permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,

GENERAL CONDITIONS:

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

GENERAL CONDITIONS:

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.