



Jeb Bush  
Governor

## Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

June 21, 2002

Certified return receipt  
7000 0600 0026 4127 2580

Mr. David A. Meaux  
1507 East Frisco Drive  
La Place, Louisiana 70068

Re: AP581TPA  
Alternate Procedures & Requirements  
Motiva Enterprises, LLC Terminal  
6500 Commerce Street  
Tampa, Florida  
FDEP Facility ID#298629070

Dear Mr. Meaux:

The Bureau of Petroleum Storage Systems has concluded its review of the Alternate Procedure request dated January 17, 2002, that was submitted for the above referenced facility and enclosed as Exhibit A. The request is for an exemption from the cathodic protection (CP) requirements of Rule 62-761.700 (1)(b), Florida Administrative Code (F.A.C), which details the requirements for operation, maintenance, testing and inspection of these systems. This is for the CP system for the interstice only, and not the CP system for the outer shell of Tank Number 8 at this facility. This tank has a double floor interstice that was constructed with a sacrificial anode type of CP system. The anode strips have depleted to the point where the system no longer meets the NACE minimum electromotive force requirements. The applicant has applied a corrosion inhibiting powder into the interstice (see Exhibit A for attributes). This will help to minimize the corrosion in the interstice.

The applicant has determined that it is not feasible to repair the CP system until the time that the floor needs to be replaced. This point in time is normally determined

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and/or projected from API 653 internal tank inspections. In order to get a more concise reading of the corrosion inside the interstices, the tank has been fitted with a corrosion metering probe (see Exhibit A for attributes). The probe has an accuracy rating of plus or minus 0.25 mil. The applicant will monitor this rate continuously and compare that reading to that which was projected by the API 653 internal inspection that was conducted during 1999. The applicant will then determine the time for re-entering the tank for the next API 653 inspection or floor replacement. This point in time will be determined using the worst case scenario between the probe readings and the API 653 projection.

Pursuant to Rule 62-761.850, F.A.C., the Department approves the Alternate Procedure request. The operation of this system will be conducted in accordance with the Operations and Maintenance Manual prepared by Corrpro Companies, Inc., dated March 31, 2002 and referenced to this AP581TPA. Approval for this request is based upon the fact that the method used will produce an equal or better corrosion monitoring capability than that which would occur by relying solely on the API 653 projection. In addition, the tank has secondary containment, and the interstitial monitoring system should detect a problem in the interstice before any product could be released to the environment.

The Department's Order shall become final unless a timely petition for an administrative hearing is filed under sections 120.569 and 120.57, F.S., within 21 days of receipt of this Order. Persons who have filed such a petition may seek to mediate the dispute, and choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing and pursuing mediation are set forth below.

Persons affected by this Order have the following options:

If you choose to accept the above decision by the Department about this Order, you do not have to do anything. This Order is final and effective as of the date on the top of the first page of this Order.

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If you choose to challenge the decision or request an Extension of Time to File a Petition for Hearing, you may do one of the following:

1. File a petition for administrative hearing with the Department's Agency Clerk in the Office of General Counsel within 21 days of receipt of this Order;

OR

2. File a request for an extension of time to file a petition for hearing with the Department's Agency Clerk in the Office of General Counsel within 21 days of receipt of this Order; such a request should be made if you wish to meet with the Department in an attempt to resolve any disputes without first filing a petition for hearing.

OR

3. In addition to requesting an administrative hearing, any petitioner may elect to pursue mediation under section 120.573, F.S., and must negotiate an agreement to mediate within 10 days after the deadline for filing a petition.

How to Request an Extension of Time to File a Petition for Hearing

For good cause shown, pursuant to Rule 62-110.106(4), F.A.C., the Department may grant a request for an extension of time to file a petition for hearing. Such a request must be filed (received) with the Agency Clerk in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from the applicant, shall mail a copy of the request to the applicant at the time of filing. Timely filing a request for an extension of time tolls the time period within which a petition for administrative hearing must be made.