

From: [Matthew King](#)
To: [Lancellotti, Romina](#)
Cc: [Dean Beitler](#)
Subject: Tropical Shipping P2 Project Summary
Date: Wednesday, November 11, 2020 1:07:59 PM
Attachments: [P2 Project Summary_SFCOExhibit_Dec2014.pdf](#)

Romina,

Attached please find our P2 Project Summary. We are ready to submit the payment of \$500 but I will need the DEP's W-9 to process the payment. Can you send this to me please.

Thanks,

Matthew S. King, CSP, SMS | Health, Safety & Environmental Manager | Tropical Shipping | Mailstop: MLK 01-12 |
501 Avenue P | Riviera Beach, FL 33404 | Office: (561) 882-2556 | mking@tropical.com



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This information is intended to provide interpretative information in regard to the subject matter covered as a service to our clients and has been answered to the best of our ability based on the information provided to us. We do not guarantee the accuracy or completeness of any such interpretation or information, nor do we warrant that compliance with any advice we provide will guarantee compliance with any legal or regulatory requirements. Our statements or opinions do not convey legal interpretation and government authorities or legal counsel should be contacted for such a response.

P2 Project Summary

Tropical Shipping USA, LLC
501 Avenue P
Riviera Beach, FL 33404
561-881-3900

Matthew King CSP, SMS – Health, Safety and Environmental Manager

A. Project Description:

Tropical Shipping USA, LLC plans to utilize the P2 Project to purchase two electric utility vehicles and install two (2) dual head electric vehicle charging stations for employee electric vehicle charging.

Project 1: Purchase and put into service two (2) electric utility vehicles (models GEM e4 and GEM eLXD), which will replace two (2) diesel utility vehicles (Kubota RTV-X900).

Project 2: Purchase and put into service two (2) Leviton Level 2 dual head electric vehicle charging stations. The charging stations will be model EVR30-B1C to accommodate the ability to charge four (4) vehicles simultaneously and will be located lot at our corporate office complex at 501 Avenue P, Riviera Beach, Florida 33404.

B. Environmental and Economic Benefits:

By replacing two (2) diesel utility vehicles with two electric utility vehicles, Tropical Shipping is eliminating 61% of current air emissions, 520 gallons of diesel fuel, 60 quarts of used engine oil, 12 used engine oil filters, 27 quarts of hydraulic oil and two (2) hydraulic oil filters normally produced by two diesel-powered utility vehicles annually. The P2 Project is allowing Tropical Shipping to test and pave the way to adding more electric vehicles to our fleet.

The corporate office complex will boast two (2) Leviton Level 2 dual head electric vehicle charging stations which will result in the removal of four (4) internal combustion engine vehicles from our employee's daily commute. As the demand for more electric vehicles increases, so shall the number of chargers offered at Tropical Shipping. The average American commutes 9,519 miles annually (Carinsurance.com) and emits 20 lbs. of greenhouse gases with each gallon of gasoline consumed (fueleconomy.gov). With an average of 24.9 mpg this, creates 7,646 lbs. of greenhouse gases for each internal combustion engine vehicle (Wikipedia.com). Charging four (4) electric vehicles simultaneously can prevent 30,584 lbs. of greenhouse gases from entering our atmosphere.

GEM e4 & GEM eLXD Electric Vehicles

Annual Resource Consumption Comparison

Item	Quantity Used (gal/lb/kwh-specify)			Purchasing Cost (\$)			Percent (%) Reduction
	Before	After	Reduction	Before	After	Reduction	
Water	-	-	-	-	-	-	-
Chemicals (Diesel)	520 gal	0 gal	100%	\$1196	\$0	(\$1,196)	100%
Materials (Oil)	22 gal	0 gal	100%	\$763	\$0	(\$763)	100%
Energy	0 kwh	1,210 kwh	0%	\$0	\$169	\$169	0%

Total Annual Cost Savings = \$1790

Annual Waste Generation Comparison

Item	Quantity Generated (gal/lb/tons-specify)			Disposal Cost (\$)			Percent (%) Reduction
	Before	After	Reduction	Before	After	Reduction	
Hazardous Waste	-	-	-	-	-	-	-
Industrial Wastewater	-	-	-	-	-	-	-
Solid Waste (Oil)	22 gal	0 gal	100%	\$100	\$0	(\$100)	100%
Air Emissions	4,252 lbs.	1,365 lbs.	2,887 lbs.	N/A	N/A	N/A	68%

Total Annual Cost Savings = \$100

Total Annual Avoided Cost Savings = \$1890

Leviton EVR30-B1C

Annual Resource Consumption Comparison

Item	Quantity Used (gal/lb/kwh-specify)			Purchasing Cost (\$)			Percent (%) Reduction
	Before	After	Reduction	Before	After	Reduction	
Water	-	-	-	-	-	-	-
Chemicals (Gasoline)	1,529 gal	0 gal	100%	\$3,516	\$0	(\$3,516)	100%
Materials	-	-	-	-	-	-	-
Energy	0	12,799 kwh	0%	0	\$1,792	\$1,792	0%

Total Annual Cost Savings = \$1724

Annual Waste Generation Comparison

Item	Quantity Generated (gal/lb/tons-specify)			Disposal Cost (\$)			Percent (%) Reduction
	Before	After	Reduction	Before	After	Reduction	
Hazardous Waste	-	-	-	-	-	-	-
Industrial Wastewater	-	-	-	-	-	-	-
Solid Waste (Oil)	-	-	-	-	-	-	-
Air Emissions	30,584 lbs.	15,809 lbs.	14,775 lbs.	N/a	N/A	N/A	48%

Total Annual Cost Savings = N/A

Total Annual Avoided Cost Savings = \$1724

Summary of All P2 Projects							
Annual Resource Consumption Comparison							
Item	Quantity Used (gal/lb/kwh-specify)			Purchasing Cost (\$)			Percent (%) Reduction
	Before	After	Reduction	Before	After	Reduction	
Water	-	-	-	-	-	-	-
Chemicals (Diesel/Gasoline)	2,049 gal	0	100%	\$4712	\$0	(\$4,712)	100%
Materials (Oil)	22 gal	0 gal	100%	\$763	\$0	(\$763)	100%
Energy	0 kwh	14,009 kwh	N/A	\$0	\$1961	\$1961	N/A
Total Annual Cost Savings = \$3484							
Annual Waste Generation Comparison							
Item	Quantity Generated (gal/lb/tons-specify)			Disposal Cost (\$)			Percent (%) Reduction
	Before	After	Reduction	Before	After	Reduction	
Hazardous Waste	-	-	-	-	-	-	-
Industrial Wastewater	-	-	-	-	-	-	-
Solid Waste (Oil)	22 gal	0 gal	100%	\$100	\$0	(\$100)	100%
Air Emissions	34,836 lbs.	17,174 lbs.	17,662 lbs.	N/A	N/A	N/A	51%
Total Annual Cost Savings = \$100							
Total Annual Avoided Cost Savings = \$3584							

C. Project Cost:

Project 1: Purchase and put into service two (2) electric utility vehicles (models GEM e4 and GEM eLXD) which will replace two (2) diesel utility vehicles (Kubota RTV-X900).

Project Cost \$42,417.32

Projected Payback 9.6 years

Total annual cost savings \$1890 plus savings in labor costs \$2520 for a total savings of \$4410.

Project 2: Purchase and put into service two (2) Leviton Level 2 dual head electric vehicle charging stations. The charging stations will be model EVR30-B1C to accommodate charging four (4) vehicles simultaneously and will be placed in the employee parking lot at our Corporate Complex at 501 Avenue P, Riviera Beach, Florida 33404 location.

Project Cost \$12,081.01

Projected Payback 7 years

Total annual cost savings \$1724

Total Cost of Project 1 & 2:

Project Cost \$54,498.33
Projected Payback 8.8 years
Total annual cost savings \$6,134

D. Project Reporting:

1. Within 30 days of completing the P2 Project, the Respondent shall submit to the Department a P2 Project Final Report that includes the following:

a. A confirmation that the information presented in Sections A-C of the Summary is unchanged, or an updated version with the sections changed appropriately. A statement that the Project(s) was/were implemented successfully. An explanation of any problems encountered and corrections applied. *A statement indicating the date the Project was started and also the date completed.*

b. Attached expense reports, receipts, purchasing instruments and other documents itemizing costs expended on preparing and implementing the Project.

2. The Department shall review the Final Report and determine:

a. Whether the project was properly implemented; and

b. Which expenses apply toward pollution prevention credits.

3. A \$1.00 pollution prevention credit for each \$1.00 spent on applicable costs will be applied against the portion of the civil penalty that can be offset.

a. The following costs *are applicable as P2 credits* toward the civil penalty offset amount:

i. Preparation of the P2 Project;

ii. Design of the P2 Project;

iii. Installation of equipment for the P2 Project;

iv. Construction of the P2 Project;

v. Testing of the P2 Project;

vi. Training of staff concerning the implementation of the P2 Project; and

vii. Capital equipment needed for the P2 Project.

b. The following costs *shall not apply as P2 credits* toward the civil penalty offset amount:

i. Costs incurred in conducting a waste audit;

ii. Maintenance and operation costs involved in implementing the P2

Project;

iii. Monitoring and reporting costs;

iv. Salaries of employees who perform their job duties;

v. Costs expended to bring the facility into compliance with current law, rules and regulations;

vi. Costs associated with a P2 Project that is not implemented;

vii. Costs associated with a P2 Project that has not been approved by the Department; and

viii. Legal costs.

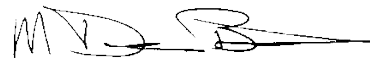
c. If any balance remains after the entire P2 credit is applied to the allowable portion of the civil penalty, Respondent shall pay the difference within 30 days of written notification by the Department to the Respondent that the balance is due.

4. The Department may terminate the P2 Project at any time during the development or implementation of it, if the Respondent fails to comply with the requirements in this document, act in good faith in preparing and implementing the project, or develop and implement the P2 Project in a timely manner. The Respondent may terminate the P2 Project at any time during its development or implementation.

5. If the P2 Project is terminated for any reason, Respondent shall pay the full balance of the allowable portion of the civil penalty within 10 days of written demand by the Department.



Matthew S. King CSP, SMS
Health, Safety & Environmental Manager



Malcom Dean Beitler
AVP Human Resources

Date Executed: 11/11/20

From: [Matthew King](#)
To: [Lancellotti, Romina](#)
Cc: [Irwin, Alannah](#); [Dean Beitler](#)
Subject: RE: Tropical Shipping USA, LLC. (EPA ID FLR000095737) - Enforcement Meeting Follow Up
Date: Thursday, September 24, 2020 4:21:19 PM

Romina,

We have determined that we will participate in the P2 project. Once we have agreed upon the specifics we will share them with you and the DEP team.

Thank you again for all of the support you continue to give. We look forward to working on this new project that reduces our environmental impact.

Cheers,

Matthew S. King, CSP, SMS | Health, Safety & Environmental Manager | Tropical Shipping | Mailstop: MLK 01-12 | 501 Avenue P | Riviera Beach, FL 33404 | Office: (561) 882-2556 | mking@tropical.com



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From: Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>
Sent: Thursday, September 17, 2020 2:02 PM
To: Dean Beitler <dbeitler@tropical.com>; Matthew King <mking@tropical.com>
Cc: Irwin, Alannah <Alannah.Irwin@FloridaDEP.gov>
Subject: Tropical Shipping USA, LLC. (EPA ID FLR000095737) - Enforcement Meeting Follow Up

Notice: This email originated from outside the TSC network.

Good afternoon everyone,

Thank you for taking the time to meet with the Department today regarding Tropical Shipping USA, LLC. As discussed, please find the link to the Pollution Prevention (P2) Project documentation:

- [P2 Enforcement Process Memo](#)
- [P2 Project Summary](#)

Please let us know by September 24, 2020 if the facility elects to conduct the P2 Project in lieu of civil penalties. In the meantime, the Department will complete the draft of the Short Form Consent Order (SFCO) with the placeholder P2 language and exhibit for Tropical Shipping USA, LLC. review. Please expect this document as soon we get the confirmation from you of the P2 Project by next week. Should you have any questions, please do not hesitate to contact me or Alannah. Thank you for your continuous and outstanding communication and cooperation in this matter. Have a great rest of your day!

Kind regards,



Romina Lancellotti

Environmental Specialist II

Florida Department of Environmental Protection

Southeast District - West Palm Beach

3301 Gun Club Road, MSC 7210-1

West Palm Beach, FL 33406

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