# M E M O R A N D U M

**DATE**: January 22, 2012

**TO**: Richard D. Garrity, Ph.D.

**FROM**: Lora Webb **THRU**: Diana M. Lee, P.E.

**SUBJECT: Draft/Proposed Permit – Kinder Morgan OLP "C"-Tampaplex**
**Permit No. 0570024-024-AV**

Attached is the TV Renewal and Revision Permit No. 0570024-024-AV for Kinder Morgan's Tampaplex Terminal, a bulk material handling facility, located at 4801 Port Sutton Road, Tampa, FL 33619. This project renews operation of the facility's current TV permit, Permit No. 0570024-020-AV. In addition, this permit incorporates Permit Nos. 0570024-022-AC and 0570024-023-AC, which authorized the installation of eleven new dust collectors on each of the conveyor transfer points. The potential PM emissions from the new and existing dust collectors and from the Stevedoring operation results in a facility wide PM PTE of 248 tons/year.

This permit also removes the PM stack testing requirement for EU No. 008 - Material Handling and Storage Silos. In a letter received via email on July 31, 2012, Kinder Morgan requested to remove the PM stack testing requirement for EU Nos. 003, 008, and 013, but did not provide a justification for this request. Per Rule 62-297.620(4), F.A.C., an emissions unit which has the potential to emit less than 100 tons per year of particulate matter and is equipped with a baghouse, the Secretary or the appropriate Director of District Management may waive any particulate matter compliance test requirements for such emissions unit specified in any otherwise applicable rule, and specify an alternative standard of 5% opacity. Since EU No. 008 has a potential to emit of 1.0 ton/year and is equipped with a baghouse, the PM stack test requirement has been removed from the permit, as requested in accordance with Rule 62-297.620(4), F.A.C. However, an annual VE test on this emission unit will be required to demonstrate compliance with the 5% opacity standard in lieu of a PM stack test. The removal of the PM testing requirement is not required to go through the air construction permit process because the Rules allow the facility to perform a VE test in lieu of a PM stack test.

On the other hand, the requirement to perform a PM stack test on EU Nos. 003 and 013 upon renewal will remain in the permit. A review of the facility's compliance history for these EUs shows that there has been one violation of the opacity standard from these emission units in the

past five years. Therefore, since these emission units are subject to PM RACT, the facility should continue to perform stack testing once every five years in order to demonstrate compliance with the 0.03 gr/dscf emissions limitation specified in Rule 62-296.711, F.A.C.

Also, the CAM plan was revised to incorporate new monitoring plans for EU Nos. Emission Unit Nos. 002, 004 – 009; 012; and 117 – 121 since new control devices were installed on these emission units.

Based on our review, we recommend approval of the above referenced permit as drafted.

LAW: 0570024-024-AV