Certified Mail

Rodney Palmer
Director of Operations
Kinder Morgan
5321 Hartford St.
Tampa, Fl 33619

NOTICE OF FINAL TITLE V AIR OPERATION PERMIT

In the Matter of an
Application for Permit Renewal:

Rodney Palmer	FINAL Permit Project No.: 0570024-024-AV
Director of Operations, Kinder Morgan	Tampaplex
5321 Hartford St. Tampa, Fl 33619	Hillsborough County

Enclosed is the FINAL Permit, No. 0570024-024-AV. The purpose is to renew the Title V air operation permit and incorporate Permit Nos. 0570024-022-AC and 0570024-023-AC at the Kinder Morgan, Tampaplex Facility. The facility is located in Hillsborough County. This permit renewal is issued pursuant to Chapter 403, Florida Statutes (F.S.). There **were no** comments received from Region 4, U.S. EPA, regarding the PROPOSED Permit.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tampa, Florida.

Sincerely,

_____ _____
Richard D. Garrity, Ph.D. Date
Executive Director

Enclosures

RDG/LAW/law

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that a copy of this NOTICE OF FINAL TITLE V AIR OPERATION PERMIT was sent by U.S. Mail or electronically (with Received Receipt) before the close of business on _____ to the person(s) listed or as otherwise noted:

Rodney Palmer, Kinder Morgan
Alice Harman, P.E., Kinder Morgan – Alice_Harman@kindermorgan.com
David Cibik, P.E., ARCADIS - david.cibik@arcadis-us.com
Ms. Ana Oquendo, EPA Region 4 - Oquendo.Ana@epa.gov
Ms. Natasha Hazziez, EPA Region 4 - Hazziez.natasha@epa.gov.
Ms. Barbara Friday, DEP BAR - barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

Clerk Stamp
FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____
(Clerk) (Date)

Title V Air Operation Permit Renewal
FINAL Permit No.: 0570024-024-AV
Kinder Morgan
Tampaplex

I. Comment(s).

No comments were received from the USEPA during their 45 day review period of the PROPOSED Permit.

Comments were received on February 4, 2013 via email from the facility. Listed below is each comment and a response to each in the order that the comment was received. The comment(s) will not be restated but are summarized. Where duplicative comments exist, the original response is referenced.

Comment No. 1: Please revise the emission unit description for Emission Units 119, 120, and 121. The emission unit description should reference C38 to C29 (not C44).

Response: The requested changes are made as follows.

From:
EU No. 119 - Silo Loading Transfer Point No. 2 (C38 to C44)
EU No. 120 - Silo Loading Transfer Point No. 3 (C38 to C44)
EU No. 121 - Silo Loading Transfer Point No. 4 (C38 to C44)

To:
EU No. 119 - Silo Loading Transfer Point No. 2 (C38 to C29)
EU No. 120 - Silo Loading Transfer Point No. 3 (C38 to C29)
EU No. 121 - Silo Loading Transfer Point No. 4 (C38 to C29)

Comment No. 2: EU No. 013 is the shiphold and is not controlled by the baghouse at EU No. 003. Therefore, no PM testing should be required upon renewal for EU 013. Specific Condition No. B.10. and Attachment Table 2, Compliance Requirements should be revised to remove the PM testing requirements for EU No. 013.

Response: Based on facility ops which are reflected in the TV permit, the ship loading operation is divided into two emission units. EU No. 003 includes the ship loading conveyor transfer operation (C13 to C14) and EU No. 013 includes the shiphold loading operation (C14 to telescopic chute and into the shiphold). The particulate matter emissions generated from both of these operations are controlled by one 9,000 DSCFM General Electric Pulse-Jet baghouse and/or a gantry mounted dust suppression system. As a result, the requirement for testing includes both of these emission units since they are controlled by one baghouse which is required to demonstrate compliance with the 0.03 gr/dscf standard. Therefore, no changes will be made to Specific Condition No. B.10.

Comment No. 3: Add the following to the process description in order to better describe the facility's operations:
Page 2, 3rd paragraph – add (EU No. 117) after C19
Page 2, 3rd paragraph - add (EU No. 009) after C38

Page 5, 1st paragraph – add (EU No. 112) after "..Stevedoring operation"
Page 5, 5th paragraph – add aka Blackpoint next to North Star Recycling Slip since the berth is known by either.

Response: The changes are made as requested.

Comment No. 4: Specific Condition No. FW.13.c) is a consolidation from the previous permit where in each section of the permit it authorized the baghouses to be off while handling oiled MAP/DAP. The previous permit also allowed for the use of dust suppressant in lieu of operating the control system(s) during the handling of materials provided the 5% opacity was not exceed. We are asking for clarification as to the baghouses, if they can only be off when handling oiled MAP/DAP or can they also be off when handling other materials treated with dust suppressant?
In addition, remove Specific Condition No. FW.13.d) since it is a duplicate of what is stated in FW.12.b.

Response: As previously stated under Project No. 0570024-018-AC, the potential PM emissions for each emission unit in the permit were calculated using the flowrate of the dust collectors, the hours of operation, and a grain loading limitation of 0.03 gr/dscf. In order for the facility to have the authorization to handle oiled MAP/DAP with the dust collectors turned off, the potential emissions from the handling operation should be equal or less than the potential emissions calculated with the use of the dust collectors. The potential emissions for the handling of fertilizer material with the dust collectors was calculated at 110.6 tons/year.

It was determined that eight transfer points (material unloaded from railcars (EU No. 002) and transferred via conveyors into the storage silos (EU Nos. 004, 009, and 012) and then transferred via conveyors into a ship (EU Nos. 003, 005, and 006)) will be worst case for the calculation of PM emissions without the baghouses. Using a throughput of 10,000,000 tons of oiled MAP/DAP, an emission factor of 0.065 lb/ton from a stack test performed at a similar source while handling oiled DAP, eight transfer points, an 80% control efficiency for oiling, an 80% control efficiency for partial enclosures on the conveyors, and a 70% control efficiency for the drop into the shiphold, the maximum potential emissions were estimated to be 110.5 tons/year. Because this is less than the potential emissions from the dust collectors controlling EU Nos. 002, 003, 004, 006, 005, 009, and 012, the permit was revised to allow the facility to handle oiled MAP/DAP without the dust collectors operating. Specific Condition No. A.3. was revised to allow the facility to handle a maximum of 10,000,000 tons of oiled MAP/DAP with the dust collectors turned off. If Kinder Morgan wants to handle other products, then the facility should evaluate and calculate the potential emissions associated with these new products and determine if the PM PTE will result in an increase in emissions.

In regards to Specific Condition No. FW.13.d), it clarifies that the Stevedoring operation does not have a material limit throughput and is subject only to an annual emissions limit. Therefore, in order to avoid confusion on whether there is a throughput limitation for the Stevedoring operation, EPC staff believes that the condition is necessary and should remain in the permit.

Comment No. 5: In Section III., Subsection A. of the permit, in the description under EU No. 002 – the word fertilizer should be removed from the second paragraph. "….applied to the fertilizer product" because other materials could receive the dust suppressant. Also, in Specific Condition No. A.11., the

last sentence needs to be edited to remove the reference to the scrubber "..of the scrubber such as inlet pressure drop and liquor feed rate."

Response: The requested changes are made as follows.

From:
Particulate matter emissions generated from the railcar unloading operation are controlled by a 100,000 DSCFM Dustex Top Load Pulse Jet Baghouse and/or by the application of dust suppressant oil applied to the fertilizer product at the chemical processing facility prior to shipping.
A.11. …. Failure to submit the input rates and actual operating conditions of the scrubber such as inlet pressure drop and liquor feed rate, may invalidate the test.

To:
Particulate matter emissions generated from the railcar unloading operation are controlled by a 100,000 DSCFM Dustex Top Load Pulse Jet Baghouse and/or by the application of dust suppressant oil applied to the materials at the chemical processing facility prior to shipping.

A.11. …. Failure to submit the input rates and actual operating conditions may invalidate the test.

Comment No. 6: In the Statement of Basis, it states that EU No. 008 has PTE of 1 ton/year. Should it be included in the CAM as stated by Specific Condition No. D.7.? Can this condition be removed? What about EU No. 129?

Response: Based on an assumed 99% control efficiency for the dust collector, a 3,200 DSCFM flowrate, a grain loading standard of 0.03 gr/dscf, and 2,500 hours/year of operation, the pre-control particulate matter emissions for EU No. 008 are calculated to be 102.9 tons/year. 40 CFR 64.2 states that the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. Because the pre-control particulate matter emissions are greater than 100 tons/year, EU No. 008 is subject to the CAM requirements.

For EU No. 129, based on an assumed 99% control efficiency for the dust collector, a 2,730 DSCFM flowrate, a grain loading standard of 0.03 gr/dscf, and 2,500 hours/year of operation, the pre-control particulate matter emissions for this EU are 87.7 tons/year. Therefore, EU No. 129 is not subject to CAM.

Comment No. 7: Can language be added to Specific Condition No. H.3.g to clarify that the flow meters are for water flow for the dust suppression system?

Response: As requested, the following change is made to clarify that the flow meters are intended to measure the water flow rate of the dust suppression system.

From:
g) The permittee shall install, calibrate, and maintain flow meters for Emission Unit Nos. 104 through 110.

To:

g) The permittee shall install, calibrate, and maintain flow meters for the dust suppression system for Emission Unit Nos. 104 through 110.

Comment No. 8: In Appendix CAM, for the Indicator No. 2 – We have concern that the excursion defined as a pressure drop greater than 6 inches is too low for the railcar unloading baghouse EU No. 002. The O&M pages show the ranges from 0 to 20 inches for the various baghouses grouped together. Can we detail the excursion level per baghouse type (ie EU 3,5,6 – 8"; others 10")?

Response: EPC staff has reviewed various literatures, including EPA's technical documents, on baghouse pressure drop and understands the pressure drop across the baghouse is very much depending upon cleaning cycle time. The pressure drop across the fabric filter is the sum of the static pressure drop across the cleaning fabric and that developed across the filter cake. The pressure drop across the filter cake increases over time from the last to the next cleaning cycle. Fabric filters are usually designed for maximum static pressure drops below 6 in. W.C. Operating at higher values may indicate cleaning system malfunctions or higher A/C conditions. However, many units can operate with a differential pressure of up to 10 in. W.C. However, high pressure drop values may be indicative of bag cleaning system problems and could lead to capture problems at the source and/or pinholes in the bags which could lead to visible emission problems. Based on inspections conducted by EPC staff, the pressure gauges installed in the baghouses at the Kinder Morgan facility have a range of 0 – 10 inches of water.

After further discussions with Kinder Morgan, the facility stated that a pressure drop range of 0 – 6 inches is sufficient for all baghouses except for EU 002. The initial compliance test conducted on the railcar unloading operation on September 11, 2012, resulted in an average PM emission of 0.001 gr/dscf. Therefore, based on this test result and the fact that this is a new baghouse system that will be tested on an annual basis, EPC staff does not have an objection in providing the facility flexibility by increasing the pressure drop range for EU 002 to 0 - 8 inches. This pressure drop range may be re-evaluated based on the performance of the baghouse system over time and results from annual compliance testing.

Comment No. 9: The following corrections should be made to Appendix Operation and Maintenance:
Stack Height: EU 129 – is 10 feet not 129 feet
Exit Diameter: EU 002 is in feet; all the other dimensions are in inches
EU 003 – item 12 – the air pressure is 90 psig maximum not minimum

Response: The changes are made as requested.

Comment No. 10: In Attachment Table 2, Compliance Requirements, remove the requirement for Method 5 testing for EU No. 004 since there is no requirement in the permit to test this EU.

Response: The change is made as requested since the permit does not specify a PM testing requirement for EU No. 004.

II. Conclusion.

In conclusion, the permitting authority hereby issues the FINAL Permit with the changes noted above.