M E M O R A N D U M

DATE: July 12, 2013

TO: Richard D. Garrity, Ph.D.

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

SUBJECT: Final Construction Permit – Kinder Morgan Bulk Terminals, Inc.
Permit No. 0570092-019-AC

Attached is Final Permit No. 0570092-019-AC being issued for the construction of two additional transfer routes at the Hartford Street Terminal Warehousing operations. The main proposed material transfer operation will consist of a new railcar unloading pit and a bucket elevator at the North rail track, in order to transfer bulk material to Storage Buildings 1 and 2 using the existing facility conveyor(s). Also, Kinder Morgan will add an under car unloading conveyor (RBT) at the South rail track which will transfer material directly from railcar to truck. Kinder Morgan's Hartford St. Terminal is a bulk material handling facility, located at 5321 Hartford Street, Tampa, Fl 33619.

The facility published the Public Notice in The Times, an edition of the Tampa Bay Times on June 27, 2013. No comments were received from the facility or the public.

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

LAW: 0570092-019-AC

FINAL DETERMINATION

FOR

Kinder Morgan Bulk Terminals, Inc.
Hartford Street Terminal

Hillsborough County

Construction Permit

Permit Number

0570092-019-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

July 12, 2013

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on June 21, 2013 that included an Intent to Issue Air Construction Permit No. 0570092-019-AC to Kinder Morgan Bulk Terminals, Inc. The facility is located at 5321 Hartford Street, Tampa, Hillsborough County, FL 33619. The air construction permit authorizes construction of two additional transfer routes at the Hartford Street Terminal Warehousing operations. The main proposed material transfer operation will consist of a new railcar unloading pit and a bucket elevator at the North rail track, in order to transfer bulk material to Storage Buildings 1 and 2 using the existing facility conveyor(s). Also, Kinder Morgan will add an under car unloading conveyor (RBT) at the South rail track which will transfer material directly from railcar to truck. .

The Public Notice of Intent to Issue was published in The Times, an edition of the Tampa Bay Times on June 27, 2013.

COMMENTS/CHANGES

No comments were received from the applicant or the public.

CONCLUSION

The final action of the Environmental Protection Commission of Hillsborough County is to issue the permit as drafted.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

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

Re: Hillsborough County - AP

Dear Mr. Palmer:

Enclosed is Permit No. 0570092-019-AC to construct two additional material transfer operations. This permit is issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Dr, Tampa, FL 33619; 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 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

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

RDG/LAW/law

cc: Florida Department of Environmental Protection (via email)
David Cibik, P.E. – ARCADIS, Inc. (via email)
Alice Harman, P.E. – Kinder Morgan (via email)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

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

_____ _____
Clerk Date

PERMITTEE:	PERMIT/CERTIFICATION
Kinder Morgan Bulk Terminals	Permit No.: 0570092-019-AC
5321 Hartford Street	County: Hillsborough
Tampa, FL 33619	Expiration Date: June 21, 2015
	Project: Two Railcar Unloading Operations

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named 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 EPC and made a part hereof and specifically described as follows:

This permit is being issued for the construction of two additional transfer routes at the Hartford Street Terminal Warehousing Operations. The main proposed material transfer operation will consist of a new railcar unloading pit and a bucket elevator at the North rail track, in order to transfer bulk material to Storage Buildings 1 and 2 using the existing facility conveyor(s). Also, Kinder Morgan will add an under car unloading conveyor (RBT) at the South rail track which will transfer material directly from railcar to truck. Kinder Morgan's Hartford St. Terminal is a bulk material handling facility, located at 5321 Hartford Street, Tampa, Fl 33619.

The main proposed material transfer operation will allow the facility to transfer dry bulk material from the railcar unloading pit and conveyed to a bucket elevator using a conveying system and then to a "pants-splitter diverter" apparatus which could either transfer the material to existing North Warehouse No. 1 or to the existing overhead enclosed belt conveyor, which would then transfer the material to the existing South Warehouse No. 2. The splitter-diverter will be located at the beginning of an existing conveyor belt, C2. Once inside the warehouses, the material will be transported to an elevated screener, which will sort and direct the material into two piles: one with a larger diameter product and one with a smaller diameter product. This screening process will be completely enclosed within the warehouses. When the material is ready to be loaded out, a truck will drive into either of the two buildings and a front-end loader will load the material into the truck. Alternatively, a front-end loader will load an existing hopper in Building 2 which will transfer the material to an existing bucket elevator. The bucket elevator will direct the material to an existing a railcar/truck loading spout.

A second proposed material transfer operation will involve the transfer of material from the railcar directly into a truck. A fully enclosed portable conveyor belt will be positioned directly under the railcar unloading chute and will be used to transfer the material directly into a truck. A rubber boot or shroud will be installed at the exit point of the conveyor belt to minimize the drop height into the truck.

In addition to the two storage buildings described above, there is a third storage building, referred to as the Material Storage Building, which is used primarily to store salt. Trucks drive into the storage building and dump the material directly onto the ground. Front end loaders then transfer the material to a storage pile. When ready to be loaded, a truck drives into the storage building and a front end loader loads the material directly into the truck. The third storage building does not have any screeners or conveyor belts. The facility also has a Bag Storage Building which is used to store bagged product. Bags of product are received by truck or railcar and are stored in the building until they are ready to be shipped offsite. No bagging of material occurs onsite.

In addition, non-water soluble products may be stored in outdoor storage piles at the Hartford Street Terminal. These products are received by truck and are unloaded directly onto the ground. Front end loaders then transfer the material to a storage pile(s). When ready to be loaded, a front end loader loads the material directly into a truck. A water spray system controls emissions from this operation as needed.

Location: Hartford Street Terminal - 5321 Hartford Street, Tampa, FL 33619

UTM: 17- 360.10E 3087.5N Facility ID No.: 0570092

Emission Unit Nos.:
105 – Hartford Street Terminal Warehousing Operations
- Emission Point (EP) No. 1 – Truck Unloading to Ground
- EP No. 2 - Railcar Unloading Pit with Conveyor to Bucket Elevator with Splitter
- EP No. 3 - Front End Loader to Outdoor Receiving Hopper
- EP No. 4 - Outdoor Receiving Hopper to Conveyor Belt 1
- EP No. 5 - Conveyor Belt 1 or Splitter to Conveyor Belt 2
- EP No. 6 - Conveyor Belt 2 to Screener 1 or to Warehouse 1 stockpile
- EP No. 7 - Conveyor Belt 2 to Conveyor Belt 4
- EP No. 8 - Conveyor Belt 4 to Screener 2 or to Warehouse 2 stockpile
- EP No. 9 - Screener 1 or Screener 2 to Warehouse 1 or 2 Stockpile
- EP No. 10 - Stockpile 1 or 2 to Truck or to Load Out Hopper via Front End Loader
- EP No. 11 - Load Out Hopper to Truck via to Bucket Elevator

106 - Hartford Street Terminal Stockpiling Operations
- EP No. 1 – Truck to Ground
- EP No. 2 – Pile to Truck via Front End Loader
- EP No. 3 – Truck to Ground in the Material Storage Building
- EP No. 4 - Pile to Truck via Front End Loader in the Material Storage Building
- EP No. 6 – Railcar to under car unloading conveyor (RBT)
- EP No. 7 - Under car unloading conveyor (RBT) to Truck

References Permit Nos.: 0570092-016-AC

Replaces Permit No.: N/A

SPECIFIC CONDITIONS:

1. Not federally enforceable. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

2. As requested by the permittee, in order to remain a minor facility with respect to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., the facility wide potential to emit particulate matter emissions shall not exceed 245 tons per twelve consecutive month period, which is comprised of the following operations: [Rule 62-4.070(3), F.A.C. and Permit No. 0570092-016-AC]

a. Particulate Matter Emissions from the Port Sutton Terminal: 91.6 tons
b. Particulate Matter Emissions from the Hartford Street Terminal: 153.4 tons

3. Unconfined Particulate Matter. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements. The following requirements are "not federally enforceable": [Rule 62-296.320(4)(c)2., F.A.C. and Permit No. 0570092-016-AC]

a. Enclose all conveyor belts on the top and sides.
b. The vehicles transporting the bulk material on the property shall be completely enclosed by construction or shall be enclosed with tarps prior to leaving the facility.
c. The permittee shall ensure that the bulk material has adequate moisture content in order to comply with the 5% opacity standard prior to being unloaded from trucks.
d. Watering shall be performed as necessary to minimize particulate dust emissions during material unloading, transferring, and loading operations performed outdoors.
e. Dust suppressant shall be applied as necessary to untreated material and plant grounds.
f. All access openings near transfer stations shall stay closed during bulk material transfer.
g. Maintain trafficked roads clean. Limit vehicular traffic to 10 MPH or less if necessary.
h. Inspect material handling equipment for visible emissions daily when in operation. Record any problems and actions taken.
i. Make plant personnel aware of environmental requirements in this permit.
j. Exercise good housekeeping practices at all times.

4. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Environmental Protection Commission and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(2), F.A.C. [Rules 62-213.440(3) and 62-213.900, F.A.C.]

5. The permittee shall submit all compliance related notifications and reports required of this permit to the Environmental Protection Commission of Hillsborough County at: [Rule 62-4.070(3), F.A.C.]

SPECIFIC CONDITIONS:

Environmental Protection Commission
Air Management Division
3629 Queen Palm Dr.
Tampa, FL 33619
Telephone: 813/627-2600, Fax: 813/627-2660

6. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to: [Rule 62-4.070(3), F.A.C.]

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

7. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(2), F.A.C.]

8. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200(205), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

a. Alteration or replacement of any equipment or major component of such equipment.
b. Installation or addition of any equipment which is a source of air pollution.
c. The handling of any new material not identified in this permit.

9. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable requirement or permit condition is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. For the purpose of confirming compliance with the emission limitations in this permit, the EPC may require the use of EPA Method 9 or other approved methods as deemed necessary. [Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

10. Certification by Responsible Official (RO). In addition to the professional engineering

certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

11. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

12. The permittee shall give prior notification and obtain approval from the EPCHC for the loading and/or unloading of any new material not identified in this permit. [Rules 62-4.070(3) and 62-210.200(205), F.A.C.]

13. A minimum of two copies of a Title V air operating permit application shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of the compliance test or at least 180 days prior to the expiration date of this permit, whichever occurs first. [Rules 62-4.050(2) and 62-4.090, F.A.C.]

SPECIFIC CONDITIONS:

Subsection A. This section addresses the following emissions unit(s)

E.U. ID No.	Brief Description
105	Hartford Street Terminal Warehousing Operations
106	Hartford Street Terminal Stockpiling Operations

Enforceable Potential to Emit (PTE) Parameters

14. Permitted Capacity. The following limitations and restrictions shall apply per any 12 consecutive month period: [Rules 62-4.070(3) and 62-210.200, F.A.C., Definitions - (PTE) and Permit No. 0570092-016-AC]

a. Maximum Truck Loading and Unloading Rate: 450 TPH
b. Maximum Railcar Loading Rate: 450 TPH
c. Maximum Railcar Unloading Rate: 300 TPH

15. Hours of Operation. Each emission unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.070(3) and 62-210.200, F.A.C., Definitions - (PTE)]

16. The maximum number of transfer points shall not exceed nine. [Rules 62-4.070(3) and 62-210.200, F.A.C., Definitions - (PTE)]

Emission Limitations and Standards

17. Visible emissions from any emissions unit, building, enclosure, or activity shall not exceed 5 percent opacity. [Rules 62-296.711(2)(a) and 62-4.070(3), F.A.C.]

18. In order to ensure compliance with Facility Wide and Specific Condition No. 2, the following limitations shall apply per any twelve consecutive month period: [Rule 62-4.070(3), F.A.C. and Permit No. 0570092-016-AC]

a. The facility shall handle only the following materials:

Group I – Dusty Fertilizers		
Ammonium Sulfate	Standard Potassium Nitrate	Animal Feed Ingridients
Standard Muriate of Potash	Granular Sulfate of Potash	Granular Muriate of Potash
Standard Sulfate of Potash		
Group II – Minimally Dusty Fertilizers		
Ammonium Nitrate	Sodium Potassium Nitrate	MAP
Calcium Ammonium Nitrate	Compound Fertilizers	DAP

SPECIFIC CONDITIONS:

Group II – Minimally Dusty Fertilizers (continued)		
Potassium Nitrate	Dried Sludge	GTSP
Calcium Nitrate	Urea	Kieserite
Group IV – Semi-Dusty Non-Fertilizer Products		
Coal Fines	Iron Ore Fines	Millscale
Group V – Moderately Dusty Non-Fertilizer Products		
Coal	Syngypsum	Clay
Petcoke	Magnetite/Ferrous Oxides	
Iron Ore	Alumina Hydrate	
Group VI – Minimally Dusty Non-Fertilizer Products		
Gypsum	Alumina Hydrate	Filler Materials
Pumice	Vermiculite	Peanut Hulls
Granulated Furnace Slag	Dolomite	Salt (solar)
Ferrous Sulfate	Glass	Bio-Mass
Ferro Alloys	Iron Scrap (including shredded scrap metal)	Magnetite/Ferrous Oxides
Coal Slag	Wood Chips	Clinker (treated or screened)
Prilled Sulfur		
Group VII – Agricultural Products		
Seeds	Soybeans	Peas
Citrus Pellets		
Group VIII – Bauxite/Alumina and similar Dusty Cement-like Products		
Bauxite	Alumina	Slag Cement
Group IX - Aggregate		
Aggregate	Dirt, Soil	Granite
Limestone	Sand, Gravel	Rocks, stone
Limestone Fines		

b. Compound fertilizers listed in Group II are defined as "ammonium nitrate with potash". The material shall have properties consistent with the MSD sheet received April 2, 2002.

c. When calculating particulate matter emissions in order to demonstrate compliance with Specific Condition No. 2, the emission factors and control efficiencies listed below for each group of material shall be used.

SPECIFIC CONDITIONS:

Group Number	Emission Factor	Max. Number of Transfer Points
I	0.19	9
II	0.01	9
IV	1	9
V	0.2	9
VI	0.067	9
VII	0.086	9
VIII	0.11	9
IX	0.02	9

d. When calculating particulate matter emissions in order to demonstrate compliance with Specific Condition No. 2, the following control efficiencies shall be used.

EU No. 105, Emission Point No.	Control Efficiency
1	50%
2	65%
3	65%
4	65%
5	90%
6	90%
7	90%
8	90%
9	90%
10	90%
11	65%
EU No. 106, Emission Point No.	Control Efficiency
1	50%
2	50%
3	90%
4	90%
5	50%
6	50%
7	50%

SPECIFIC CONDITIONS:

e. Millscale shall be treated with water or a dust suppressant at the first material transfer point and subsequent material transfer points as necessary to meet the 5% opacity standard.

f. All materials in Group VIII shall be treated with a dust suppressant at the first material transfer point and subsequent material transfer points as necessary to meet the 5% opacity standard.

19. The permittee shall not handle grains at the Hartford Street Terminal. [Rule 62-4.070(3), F.A.C. and Permit No. 0570092-016-AC]

Test Methods and Procedures

20. Test EU No. 105, Emission Point (EP) Nos. 2, 5, 6, 8, 9, and 10 and EU No. 106, Emission Point (EP) Nos. 6 and 7 listed on Page 2 of this permit for opacity the first time each emission point is operated and annually thereafter. Tests shall be conducted while handling the dustiest material handled at the facility within the previous 12 months. Test results shall be submitted in duplicate within 45 days of testing to the Air Management Division of the Environmental Protection Commission of Hillsborough County. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. Failure to submit the process rate and the moisture content with the test report or operation at conditions during testing which do not reflect actual operating conditions may invalidate the test. [Rules 62-4.070(3), 62-297.310(7)(a) and (8), F.A.C.]

21. Compliance with emission limitations of Specific Condition No. 17 shall be determined using EPA Method 9 contained in 40 CFR 60 Appendix A and adopted by reference in Rule 62-297.310, F.A.C. Each visible emission test shall be at least 30 minutes in duration. EPA Method 9 may be used for operations which are normally completed within less than the minimum observation period and do not recur within that time, in that instance, the period of observation shall be equal to the duration of the operation completion time. The minimum requirements for stack sampling and reporting shall be in accordance with Rule 62-297, F.A.C. The test report shall include information regarding the moisture content of the material as received which may be obtained from information provided by the material supplier. [Rules 62-296.711(3)(a) and 62-297.310(7), F.A.C.]

22. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity listed in Specific Condition No. 14. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the throughput rates, the actual operating conditions, and information on whether or not the whether the material was treated may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

23. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance

test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

Monitoring, Recordkeeping, and Reporting Requirements

24. The permittee shall perform the following checks and inspect the condition of each of the following equipment on a daily and weekly basis and shall perform any necessary maintenance work in order to keep the equipment in good working order to minimize fugitive particulate matter emissions. [Rule 62-296.700(6)(c)2., F.A.C.]

Daily (when in operation)

Perform daily instantaneous visible emissions checks on each emission unit operated and record the results of the checks.

Weekly

a. Conveyor belts
b. Belt idlers
c. Conveyor covers
d. Chain casings
e. Electric motors
f. Belt drives
g. Transfer points
h. Railcar loading chutes
i. Truck loading enclosures

Quarterly

a. Inspect and test run all conveyor belts
b. Inspect all conveyor belt flashings
c. Verify the correct tracking of the conveyor belts
d. Inspect the belt wipers on each transfer point
e. Inspect the structural enclosures around the transfer points for good condition
f. Inspect the transfer chutes for obstructions

25. Records of the checks and inspections required in Specific Condition No. 24 and records of performance parameters shall be retained for a minimum of five years and shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request. [Rule 62-296.700(6)(e), F.A.C.]

26. In order to show compliance with Specific Condition Nos. 16, 18, and 19, the permittee shall maintain monthly records of operations for the most recent five year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request. The records shall include, but not limited to, the following: [Rules 62-

SPECIFIC CONDITIONS:

296.700(6)(c) and 62-4.070(3) F.A.C.]

a. Month and Year
b. Amount, Group, and Type of each material received (tons)
c. Amount, Group, and Type of each material shipped offsite (tons)
d. Monthly and twelve month rolling summary of particulate matter emissions from material handling. When calculating particulate matter emissions, the emission factors and control efficiencies listed in Specific Condition No. 18 shall be used.
e. Twelve month rolling total of b., c., and d. above
f. Records of significant spills, maintenance activities, and service activities

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____

Richard D. Garrity, Ph.D.
Executive Director