TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Kinder Morgan
5321 Hartford St.
Tampa, FL 33619

Port Manatee Terminal

Facility ID No. 0810004

PROJECT

Project No. 0810004-023-AC
Application for Minor Air Construction Permit
Project Name: Baghouse Replacement and Wet Material Handling

COUNTY

Manatee County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air and Solid Waste Permitting
Southwest District Office
Temple Terrace, Florida 33637-0926

October 03, 2014

Prepared by Richard Spaulding, PE

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Facility Description:

The facility is a synthetic non-Title V dry bulk material handling and storage facility. The facility is considered synthetic based on potential particulate matter (PM_{10}) emissions, which could be equal to or greater than 100 tons/yr. if the baghouses on Emission Unit Nos. 001, 002, 003, 005, 006, 007, and 008 were not operated.

II. Project Description:

A. Applicant:

Rodney Palmer, Director of Operations
Kinder Morgan
5321 Hartford Street
Tampa, FL 33619

B. Professional Engineer:

David Cibik, PE
ARCADIS
14025 Riveredge Drive, Suite 600
Tampa, FL 33637

C. Project Location:

Manatee County at 500 National Street in Palmetto, Florida. UTM coordinates Zone 17, 347.59 km East, and 3057.65 km North

D. Project Summary:

To replace a baghouse associated with Emission Unit (EU) No. 006 for the Scale Building with a more modern unit and allow for an alternative pathway with respect to the handling of wet material involving the loadout bins, as further described in the permit.

E. Application Information:

Application Received on: 09/11/2014
Application Complete on: 09/11/2014

III. Applicable State and Federal Regulations

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	operations include activities that are sources of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	N	project is not expected to be a source of VOC and odors
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	facility is not a source of VOC and Manatee County is an attainment area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	facility is not subject to the requirements of Rule 62-296.700 as potentially applicable emission units have emission limitations that qualify for exemption pursuant to Rule 62-296.700(2)(a), F.A.C.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	facility does not emit an applicable pollutant
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	facility does not emit an applicable pollutant
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source for the pollutant PM_{10}

Subject to:	Y/N	Comments
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VE testing is required for EU Nos. 001, 002, 003, 005, 006, 007, 008, 009, 010, 011, 012, 013, 014, 015, and 016

IV. Summary of Emissions (Note: The Emissions are unchanged from previous permit 0810004-0019-AC)

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy)
PM	001 – RC/Truck Unloading	2.1	2.1
	002 – RC/Truck Unloading	2.1	2.1
	003 – RC/Truck Unloading	2.1	2.1
	005 – Transfer Tower	2.1	2.1
	006 – Scale Building	2.1	2.1
	007 – Warehouse No. 1	2.1	2.1
	008 – Top of Silo (Surge Hopper)	2.1	2.1
	009 – Ship East Hold	2.1	2.1
	010 – Ship East Hold	2.1	2.1
	012 – Material to Trucks 013 – Material to Storage 014 – FEL/Trucks 015 – FEL to Truck/Railcars 016 – Ship Self Unloading	64	64
	Total	82.9	82.9
PM10	001 – RC/Truck Unloading	2.1	2.1
	002 – RC/Truck Unloading	2.1	2.1
	003 – RC/Truck Unloading	2.1	2.1
	005 – Transfer Tower	2.1	2.1
	006 – Scale Building	2.1	2.1
	007 – Warehouse No. 1	2.1	2.1
	008 – Top of Silo (Surge Hopper)	2.1	2.1
	009 – Ship East Hold	2.1	2.1
	010 – Ship East Hold	2.1	2.1
	012 – Material to Trucks 013 – Material to Storage 014 – FEL/Trucks 015 – FEL to Truck/Railcars 016 – Ship Self Unloading	64	64
	Total	82.9	82.9
VE Limitation			
VE	001, 002, 003, 005, 006, 007, and 008		5%
	009, 010, 012, 013, 014, 015, 016		<20%

Note: These are unchanged from operation permit 0810004-022-AO.

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).