February 2, 2011

Mr. Arthur Rudolph
General Manager
Kinder Morgan Bulk Terminals, Inc.
Tampaplex Terminal
1500 Greenleaf Street
Charleston, SC 29405

Re: Title V Air Operation Permit Revision
Proposed Permit Project No.: 0570024-019-AV

Dear Mr. Rudolph:

One copy of the "PROPOSED Determination" for the revision of the Title V Air Operation Permit for the Kinder Morgan Terminals, Tampaplex located at 4801 Port Sutton Road, Tampa, Hillsborough County, is enclosed. This letter is only a courtesy to inform you that the DRAFT Permit has become a PROPOSED Permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

"http://appprod.dep.state.fl.us/air/emission/apds/default.asp"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED Permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED Permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Stephen Hathaway at (813)627-2600 x 1268.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/SRH/srh

Enclosures

cc: David Cibik, P.E. – Malcolm Pirnie

Barbara Friday, BAR [barbara.friday@dep.state.fl.us] (for posting with Region 4, U.S. EPA)

# PROPOSED Determination

Title V Air Operation Permit Revision
PROPOSED Permit Project No.: 0570024-019-AV


## I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION" to Kinder Morgan Terminals, Tampaplex located at 4801 Port Sutton Road, Tampa, Hillsborough County was clerked on December 20, 2010. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION" was published in The St. Petersburg Times on December 31, 2010. The DRAFT Permit was available for public inspection at the Environmental Protection Commission of Hillsborough County in Tampa. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION" was received on January 10, 2011.

## II. Public Comment(s).

No comments were received from the general public since the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT REVISION" was published. Comments were received from Kinder Morgan and the DRAFT Permit was changed based on these comments. The comments were not considered significant enough to re-issue the DRAFT Permit and require another Public Notice. Listed below is each comment and a response to each one in the order that the comment was received. Where duplicative comments exist, the original response is referenced.

**A.** Written comments from Alice Harman, P.E. on behalf of Kinder Morgan dated January 3, 2011 and received on January 4, 2011:

**Comment No. 1.** The Statement of Facts (file name 0570024-019.AV.SOB.D) description on the third page, second paragraph did not get updated to reflect that this is a "General Electric Pulse-Jet" and no longer a Mikro Pulsaire, Model lF2.

**Response:** This was a typographical error and the permit has been corrected.

**Comment No. 2.** Please check the footer on Page 2 as it reflects only 38 pages not 39.

**Response:** This was a typographical error and the permit has been corrected.

**Comment No. 3.** On Page 3 of 39 third paragraph describing EU 013, it states that "particulate matter emissions generated during the shiphold loading operation (C13 to C14 and C14 to telescopic chute) are controlled .. . ". However in other areas of the permit such as the Table of Contents, Section B, Table 2-1, CAM, and O&M, it states "C14 to Shiphold". As discussed during the Agency's site visit and meeting, the baghouse does not control the shiphold but the transfer point from Conveyor 14 to the telescoping chute. Please revise the EU 013 description throughout the permit to be similar to page 3 as stated to "C14 to telescoping chute".

**Response:** EPC agrees with Kinder Morgan on the proposed change in the description for EU 013. The permit has been changed to reflect that the General Electric Pulse-Jet baghouse controls the transfer point from Conveyor 14 to the telescoping chute.

**Comment No. 4.** Page 3 of 39 third paragraph last sentence, we would request that "water or" be added before "a surfactant chemical that is mixed with water". As noted in Specific Condition 6.I., we have and want the flexibility to use water or other dust suppressants as appropriate throughout the facility to control emissions. The change is also requested on Page 16 of 39, Section B second paragraph.

**Response:** EPC agrees with Kinder Morgan on the proposed changes. The permit has been changed to reflect the use of water as an additional control for PM emissions.

**Comment No. 5.** On Page 6 of 39, please add the "Title V Air Operation Permit Revision Application received July 9, 2010" to the list of documents on file with the Agency.

**Response:** The "Title V Air Operation Permit Revision Application received July 9, 2010" has been added to the list of documents on file with the Agency.

**Comment No. 6.** Page 16, Section B:
i. Edit the EU description for EU 013 (see comment 3 above)
ii. First paragraph, please edit similar to the project description on page 3, material can be conveyed either directly from the railcar, <u>truck, storage buildings</u>, or from the storage silos to the shiphold.
iii. Second paragraph last sentence (see comment 4) to add "water or" before "a surfactant chemical that is mixed with water."

**Response:** EPC agrees with Kinder Morgan on the proposed changes. The permit has been changed to reflect that material can be conveyed either directly from the railcar, <u>truck, storage buildings</u>, or from the storage silos to the shiphold.

**Comment No. 7.** Page 18, Section B, Condition B.5e), we would like to have some clarification concerning the testing requirement on "each time a new material is handled during the loading of the ship". Although this was in the previous Title V permit, we have tested several materials in the last fiscal year and previous since being issued this permit. Does the term "new" intend to mean a material that has never been loaded out and had a VE test performed on it or each material that is handled after the issuance of this permit? Can we perform testing similar to other EUs where we review the dustiness ranking of the product to determine that we test the dustiest material handled during the year?

**Response:** Specific Condition B.5.e) states "Test the shiphold opening, shiploading operation, and the baghouse each time a new material is handled during the loading of the ship." This condition was intended to require an opacity test each time a new material is handled which has never been previously handled and VE tested at the facility. Therefore, the condition is being clarified to indicate that an opacity test should be conducted on any new material which has never been handled and VE tested previously through Emission Units 003 and 013.

**From:**

e. Test the shiphold opening, shiploading operation, and the baghouse each time a new material is handled during the loading of the ship.

**To:**

e. Test the shiphold opening, shiploading operation, and the baghouse exhaust each time a new material is handled during the loading of the ship. (Permitting Note: For the purposes of this Specific Condition, "new material" shall mean a material which has never been loaded out and VE tested while being handled through EU 003 and 013.)

**Comment No. 8.** Appendix O-1 page 3 several items differ from what was submitted with the application. Please refer back to our O&M submitted with the application and edit accordingly:

i. Item 1 edit ship hold to telescopic chute
ii. Item 6 change to 10" of water
iii. Item 12 the air pressure range is 60 - 125 psia
iv. Item 13 can be deleted since it is a duplicate of item 4
v. Item 18 can be deleted since it is a duplicate of item 14
vi. Item 19 edit shiploading to telescopic chute

**Response:**

i. Change made as requested.

ii.-iii. Based on the manufacturer's specifications submitted by e-mail from Andrew Ray, Lead Engineer of G.E. Energy on September 23, 2010 to David Cibik, P.E. and supported by the manufacturer's information submitted with Air Construction Permit Application No. 0570024-017-AC, "Air pressure is to be available at a minimum of 90 psig as measured at the dust collector. The pressure should be set at 60 psig initially and should only be increased to maintain a differential pressure of 5.0'' w.c." Additionally, Mr. Ray's instructions further state "Operate the controller for the pulse-jet cleaning system of the dust collector in the pulse-on-demand mode in order to obtain maximum life from the filters. The controller should be adjusted to initiate cleaning at 5.0'' w.c. and stop cleaning at 4.5'' w.c. with 0.10 seconds 'on time' duration of pulse." EPC believes that the pressure drop range across the baghouse of 0-8'' w.c. is sufficient to operate within the manufacturer's specifications. Based on literature about fabric filters such as Perry's Chemical Engineers' Handbook and Industrial Ventilation by the American Conference of Industrial Hygenists and regulatory experience, an excessive pressure drop may lead to operational problems such as localized breakdown of the filter cake and excessive penetration, leading to excessive Particulate Matter emissions. In addition, an adequate pulse-jet air pressure is necessary for the proper cleaning of the fabric filter media to prevent excessive pressure drop. Therefore, the conditions will remain the same.

iv. Change made as requested.

v. EPC does not agree that gas temperature and water vapor content are considered duplicates. Therefore, the conditions remains the same.
vi. Change made as requested.

**Comment No. 9** CAM page 10 of 13 Please add EU 013 and edit C14 to telescopic chute.

**Response:** EPC agrees with Kinder Morgan on the proposed changes. The permit has been changed to reflect the proposed changes.

**Comment No. 10** CAM page 11 pressure drop should be 10 inches of water.

**Response:** See response to Comment No. 8.

**Comment No. 11** Some comments previously submitted for Permit 0570024-018-AC should be incorporated in the Title V Revision. We have attached a copy of the comments and included a cross reference for where it is located in the Title V permit:

i. Comment 4: Title V Permit page 3 of 39 first paragraph: The sentence should be changed to "Materials are moved within the building with a front end loader, which is also used to transfer the material out of the building ~~to~~ via a hopper located ~~on the~~ inside of the storage building."

ii. Comment 5: Title V Permit page 32 of 39: EU 111 Front end loader to truck: Kinder Morgan requests that the loading of railcar be added to EU 111 description for the load out from the Stevedoring Operation. Front end loaders to truck or railcar are similar handling processes.

iii. Comment 8: Title V Permit page 36 of 39 Condition H.4.c: Kinder Morgan would request that we be allowed to use the Draft Survey completed on the vessel to determine the material throughput rates as current acceptable practice for Stevedore Operations. The Draft Survey is used in conjunction with the completed Statement of Facts to determine the tons per hour rate. These are the binding documents Kinder Morgan and the Vessel Captain attest to for the material custody transfer.

**Response:** EPC agrees with the proposed changes and the Title V permit has been revised to be consistent with 0570024-018-AC for the above referenced comments.

## III. Conclusion.

The permitting authority hereby issues the PROPOSED Permit, with any changes noted above.