STATEMENT OF BASIS

Kinder Morgan Terminals
Tampaplex Terminal
Facility ID No.: 0570024
Hillsborough County

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

This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This permit is for the revision of a phosphate rock, animal feed ingredient (AFI), fertilizer products (MAP, DAP, GTSP) and other bulk materials handling facility to incorporate the replacement of the baghouse controlling EU 003 Shiploading Operation (C13 to C14) and EU 013 Shiphold Loading (C14 to telescopic chute). The 9,000 DSCFM Mikro-Pulsair, Model 1F2 baghouse was replaced with a 9,000 DSCFM General Electric Pulse-Jet baghouse. This facility is located at 4801 Port Sutton Road, Tampa, Hillsborough County; UTM Coordinates: Zone 17,360.1 km East and 3087.5 km North; Latitude: 27° 54' 24" North and Longitude: 82° 25' 18" West.

This facility consists of truck and railcar unloading operations, a ship loading operation, silo and building storage for phosphate rock, animal feed ingredient (AFI), fertilizer products (MAP, DAP, GTSP) and other bulk materials as defined in this permit's material handling list/group description. In addition, the facility operates a marine vessel (stevedoring) loading and unloading operation of various bulk materials.

The facility receives dry phosphate rock, AFI, and fertilizer products by truck or railcar to the facility, which is stored within enclosed storage silos or buildings until transported off site by ship or barge. The products can also be transferred directly to a shiphold from a truck or railcar. The majority of these material handling operations are enclosed and controlled through baghouses. The following is a more detailed process of this operation.

During the railcar unloading operation (EU 002), the railcars are pulled into a partially enclosed structure and bottom unloaded through grates in the floor of the structure into six hoppers. Emissions from the hoppers are vented to dry cyclones. Typically four of the six hoppers are used during unloading operations. Material can then transferred from

the unloading hoppers to conveyor C17 for subsequent storage in silos via conveyors C19 and C38 (EU 012), or transferred for ship loading via conveyors C18, C12, C13 and C14. The material that will be stored in the silos can be conveyed to the outer silo Nos. 1 – 16 using a series of conveyor belts, Conveyor Belt Nos. C27, C44, and C28, or to the inner silo Nos. 17 -23 using a series of conveyor belts, Conveyor Belt Nos. C19, C38, and C29. All silos are unloaded using Conveyor Belt No. 30 prior to ship loading.

Particulate matter emissions generated from the railcar unloading operation are controlled by six parallel dry cyclones followed by a 100,000 ACFM Amerex Type C Venturi scrubber and/or by the application of dust suppressant oil applied to the fertilizer product at the chemical processing facility prior to shipping. Particulate matter emissions generated from the silo loading are controlled by a 23,100 DSCFM Ducon Venturi Oriclone, VVO, 36/84 scrubber located at ground level directly north of the storage silos.

The facility operation of the various conveyor transfer points include the following; C12 Transfer Point A (EU 005), C30 Transfer Point C (EU 006), C18 Transfer Point D (EU 007), C19 Transfer Point G (EU 009) and C17 Transfer Point E (EU 004). Particulate matter emissions generated during these transfer processes are controlled by Mikro-Pulsaire baghouses, except for C17 Transfer Point E, which is controlled by a 6000 ACFM Poly-Con, Model Venturi 1506MS, scrubber.

The material handling and storage operation (EU 008) consists of a truck unloading station, three storage silos, and a transfer conveyor system. Material is conveyed from the truck unloading station to three storage silos using Conveyor Belt No. C92. When the material is ready for shiploading, it is unloaded from the silos and conveyed to Conveyor Belt No. C12 using Conveyor Belt No. C93, and then conveyed to Conveyor Belt Nos. C13, and C14 prior to loading on the ship. Particulate matter emissions generated during the loading of any silo are controlled by a common Mikro-Pulsaire baghouse. Particulate matter emissions from the conveyor transfer point (C93 to C12) and the truck unloading station are controlled through the use of partial enclosures.

Trucks can unload material at the truck unloading Station No. 1. Trucks are driven into a partially enclosed structure and unload material through grates in the floor of the structure. The materials are dropped onto Conveyor Belt No. C82, which transfers the material from the truck unloading Station No. 1 to Conveyor Belt No. C83 (EU 102). This transfer point is entirely enclosed. Conveyor Belt No. C83 transfers the material to Conveyor Belt No. C84, which is located inside Storage Building No. 3 (EU 103). Inside the building there is a movable tipper which allows the storage piles to be placed at different locations within the building. Materials are moved within the building with a front end loader, which is also used to transfer the material out of the building via a hopper located inside of the storage building. The hopper feeds Conveyor Belt No. C104, which transfers material to Conveyor Belt No. C12, using the C12 Transfer Point A associated with EU 005. Storage Building No. 3 is solely associated with Truck Unloading Station No.1. Particulate matter emissions are controlled through the use of dust suppressants (oiling) and enclosures.

Trucks can also unload material at Station No. 2 (EU 100), where they are driven into a partially enclosed structure and unload through grates in the floor of the structure. The material is conveyed into three storage silos using a series of conveyor belts, Conveyor Belt Nos. C2, C4, C7, and C94, and a bucket elevator, No. C3. Conveyor Belt No. C4 can transfer the material to either Conveyor Belt No. C7 or C11. Conveyor Belt No. C7 transfers material to Conveyor Belt No. C94 which loads the three storage silos associated with EU 008. Conveyor Belt No. C11 transfers material to Transfer Point D (EU 007). Conveyor Belt Nos. C4 and C7 are completely enclosed in Storage Building Nos. 1 and 2. Material is also stored in the Blackpoint Storage Building, located on a Kinder Morgan land parcel west of the Tampaplex facility, across the TECO discharge slip. The Blackpoint Storage Building is used to store bagged product only.

The ship loading operation (EU 013) involves the loading of phosphate rock, fertilizer products, AFI and/or other bulk material, which can be conveyed either directly from the railcar, truck, storage buildings, or from the storage silos to the shiphold using a series of conveyor belts, Conveyor Belt Nos. C12, C13, and C14. A telescopic chute and an OBA chokefeeder are used to load the shiphold. Particulate matter emissions generated during the shiphold loading operation are controlled by a 9,000 DSCFM General Electric Pulse-Jet baghouse and/or a gantry mounted dust suppression system. The dust suppression system consists of four spray headers located throughout the gantry using water or a surfactant chemical that is mixed with water.

Kinder Morgan is also authorized to operate a marine vessel (stevedoring) bulk material loading and unloading operation at the Kinder Morgan's Tampaplex location and at numerous berths in Hillsborough County. The stevedoring operation involves the loading and unloading of various bulk materials that include fertilizer materials, coal, limestone, granite, bauxite, etc., onto and from marine vessels. These materials are divided into different group categories.

At the Tampaplex Terminal, material is unloaded from a ship by one of two clamshells. The clamshell transfers the material to one of two onshore receiving hoppers. Both hoppers, RH-01 and RH-02 (EU 104) are equipped with windshields and water sprays. From the hoppers, material is gravity transferred to a belt conveyor, BC-01 (EU 105), and then to a Radial Switch Stacker, RS-01 (EU 106). From RS-01, material can be transferred in two directions. From RS-01, material is gravity fed to a belt conveyor, PC-01 (EU 107), then to a second conveyor belt PC-02 (EU 108), and then to a second Radial Switch Stacker, RS-02 (EU 109). From RS-02, material is loaded directly into a truck or stockpiled on the ground (EU 110). A front-end loader loads the material into a truck or railcar (EU 111) for shipment offsite or for transporting the material to the storage areas.

If material is directed to the dual wing stacker, material from Radial Switch Stacker, RS-01, is gravity transferred to a belt conveyor, BC-02 (EU 107), then to a chute, and then to an uncovered belt conveyor, BC-03 (EU 108). Material is transferred from BC-03 to a dual wing stacker (EU 109) where it is stockpiled (EU 110) in one of two storage areas,

the north and south storage areas. From the storage areas, a front-end loader loads the material into a truck or railcar (EU 111) for shipment offsite.

All conveyor belts and radial stackers have partial enclosures except for Conveyors BC-01 and BC-03. Conveyor BC-01 has side skirts only because the receiving hoppers can travel along the length of the conveyor belt and partial enclosure would hinder the movement of the receiving hoppers. Conveyor BC-03 has side skirts at the chute transfer point because it is equipped with a moveable dual-wing stacker that travels along the length of the conveyor, which prevents the installation of covers or side skirts along that length. All of the conveyors and radial stackers are equipped with a water spray system. Certain materials (i.e., bauxite, magnetite, etc.), due to their physical nature, cannot be unloaded using the conveyor system. To unload these and any other materials in a manner outlined below for offsite operations, the clamshell transfers material from the ship directly into a truck or into a receiving hopper and into a truck for shipment offsite or for storage. Bauxite is required to be coated with a dust suppressant at the first transfer point at the Tampaplex Site.

In addition the Kinder Morgan Tampaplex site can receive products onto the site from Belted Self Unloading Vessels. During this operation the vessel will be equipped with an extendable conveyor belt that would transfer product directly onto a storage pile. A front-end loader loads the material into a truck or railcar for shipment offsite.

Particulate matter (PM) emissions from these facility operations are controlled by the use of a water spray system and partial enclosures, and or dust suppressants. The facility operates a truck wheel wash to wash particulate material from truck tires prior to the trucks leaving the site.

When operating at berths other than the Kinder Morgan's Tampaplex site, the Stevedoring operation operates as follows:

A maximum of three, portable clamshells used to either load or unload material from a ship are mounted to barges and moved to any of the Berths listed below. The clamshells may operate at a maximum of three berths simultaneously.

When material is unloaded from ships, material is transferred from the shiphold using one of the three clamshells to a portable receiving hopper, then to a truck, and then transported either offsite or to a storage pile. The receiving hoppers are equipped with windshields and a water spray system around the perimeter.

When material will be loaded into ships, trucks transport the material to the dock and the portable clamshells transfer the material from the dock into a shiphold. However, the material should not stockpiled on the dock longer than 24 hours.

The Stevedoring operation is permitted to operate at the following berths in Hillsborough County:

1, 2, 3, 23, 24, 24B, North Star Recycling Slip 30, 31, 201, 202, 204, 205, 206, 208, 209, 210, 211, 212, 214, 215, 219, 220, 223, 224, 225, 227, 230, 232, 250, 251, 252, 253, 256, 263, 264, 265, 268, 272, 273,
Kinder Morgan's Tampaplex Terminal
Port Tampa (near Picnic Island): 119 - Tampa Bulk Services
Rattlesnake Point: 126 - Misener Rock Company
Alafia River: Cargill Fertilizer Dock

The facility is subject to Rule 62-296.711, F.A.C. Materials Handling, Sizing, Screening, Crushing and Grinding Operations and Chapter 1-3.52, Rules of the EPC, which limit the visible emissions to a 5% opacity standard for all of the material handling operations. EPA Method 5 and EPA Method 9 testing have been determined by the Agency to satisfy the requirements of 40 CFR 70.6 and Chapter 62-296, F.A.C.

Based on the Title V Air Operation Permit Revision application received July 9, 2010 this facility is not a major source of hazardous air pollutants (HAPs).