STATEMENT OF BASIS

Title V Air Operation Permit Revision
Permit No. 0570024-020-AV

APPLICANT

The applicant for this project is Kinder Morgan Terminals, Tampaplex Terminal. The applicant's responsible official and mailing address are: Craig Mullins, Kinder Morgan Bulk Terminals, Inc., 1500 Greenleaf St, Charleston, SC 29405.

FACILITY DESCRIPTION

The applicant operates the Kinder Morgan Terminals, Tampaplex Terminal, which is located in Hillsborough County at 4801 Port Sutton Rd., Tampa, FL.

Kinder Morgan Terminals, Tampaplex Terminal consists of truck and railcar unloading operations, a ship loading operation, and 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.

The facility receives dry phosphate rock, AFI, fertilizer products, and other bulk materials by truck or railcar and conveys the materials to enclosed storage silos or buildings for storage until the materials are ready to be transported off site by ship or barge. The materials can also be conveyed directly to a shiphold from a truck or railcar. The particulate matter emissions from the unloading, storage, and ship loading operations are controlled through the use of partial enclosures and/or dust collectors.

In addition, the facility operates 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, and other materials onto and from marine vessels. Particulate matter emissions are controlled through the use of partial enclosures and water sprays.

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Permit Application received June 14, 1996
Initial Title V Permit issued October 26, 2000
Title V Air Operation Permit Revision issued May 30, 2001
Title V Air Operation Permit Administrative Correction issued January 21, 2004
Title V Air Operation Permit Renewal issued April 29, 2008
Title V Air Operation Permit Revision issued October 28, 2009
Title V Air Operation Permit Revision Application issued April 1, 2011
Application for a Title V Air Operation Permit Revision received June 30, 2011

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does not operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does not operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is notsubject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to Emission Unit (EU) 002 – Railcar Unloading Amerex Type C Venturi scrubber and EU Emission Unit 003 and 013 – Shiploading General Electric Pulse-Jet Baghouse. The emission units are subject to CAM for the regulated emission of particulate matter. Particulate matter emissions from EU No. 002 are controlled by a Amerex Type C Venturi scrubber. Particulate matter emissions from EU No. 003 and 013 are controlled by one 9,000 DSCFM General Electric Pulse-Jet baghouse and/or a gantry mounted dust suppression system.

PROJECT REVIEW

The following changes were made to the current TV Permit, Permit No. 0570024-019-AV:

1. This project revises the Title V air operation permit No. 0570024-019-AV to incorporate the operation of two GE Energy Pulse Jet Horizontal Collectors which control particulate matter emissions from C12 Transfer Point A and C30 Transfer Point C (EU Nos. 005 and 006). The process description and Specific Condition No. C.3 were revised to reflect the two new control devices.

2. During the review of the project, two diesel emergency generators were identified as possibly being subject 40 CFR 63 Subpart ZZZZ (RICE including area sources of HAPs). As a result of the rule applicability determination, the two diesel generators are subject to 40 CFR 63 Subpart ZZZZ. The rule requirements are reflected in Appendix ICE.

3. This permit has been reformatted to reflect the current permit style.

CONCLUSION

This project revises Title V air operation permit No. 0570024-019-AV, which was issued on April 1, 2011. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.