STATEMENT OF BASIS

Title V Air Operation Permit Renewal
Permit No. 0570024-024-AV

APPLICANT

The applicant for this project is Kinder Morgan Terminals, Tampaplex Terminal. The applicant's responsible official and mailing address are: Rodney Palmer, Kinder Morgan, 5321 Hartford St., Tampa, FL 33619.

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, but are not limited to, 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 renew the existing Title V permit for the above referenced facility. In addition, this permit incorporates Permit Nos. 0570024-022-AC and 0570024-023-AC which authorized installation of eleven new dust collectors on each of the conveyor transfer points.

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 issued April 1, 2011
Title V Air Operation Permit Revision issued December 5, 2011
Application for a Title V Air Operation Permit Renewal received August 20, 2012

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 operates a unit that is subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63. The facility operates an emergency generator that is subject to 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

CAIR: The facility is not subject 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 Nos. 002 – 009; 012 – 013; and 117 – 121. These emission units are subject to CAM for the regulated emission of particulate matter. Particulate matter emissions from these emissions units are controlled by dust collectors.

PROJECT REVIEW

The following changes were made to the current TV Permit, Permit No. 0570024-020-AV:

1. This project revises the Title V air operation permit No. 0570024-020-AV to incorporate the operation of eleven new dust collectors. These dust collectors control particulate matter emissions from EU Nos. 002, 004, 007, 009, 012, 117 – 121, and 129.
2. The CAM plan was revised to incorporate new monitoring plans for EU Nos. Emission Unit Nos. 002, 004 – 009; 012; and 117 – 121 since new control devices were installed on these emission units.
3. This permit also removes the PM stack testing requirement for EU No. 008 - Material Handling and Storage Silos. In a letter received via email on July 31, 2012, Kinder Morgan requested to remove the PM stack testing requirement for EU Nos. 003, 008, and 013, but did not provide a justification for this request. Per Rule 62-297.620(4), F.A.C., an emissions unit which has the potential to emit less than 100 tons per year of particulate matter and is equipped with a baghouse, the Secretary or the appropriate Director of District Management may waive any particulate matter compliance test requirements for such emissions unit specified in any otherwise applicable rule, and specify an alternative standard of 5% opacity. Since EU No. 008 has a potential to emit of 1.0 ton/year and is equipped with a baghouse, the PM stack test requirement has been removed from the permit, as requested in accordance with Rule 62-297.620(4), F.A.C. However, an annual VE test on this emission unit will be required to demonstrate compliance with the 5% opacity standard in lieu of a PM stack test. The removal of

the PM testing requirement is not required to go through the air construction permit process because the Rules allow the facility to perform a VE test in lieu of a PM stack test.

On the other hand, the requirement to perform a PM stack test on EU Nos. 003 and 013 upon renewal will remain in the permit. A review of the facility's compliance history for these EUs shows that there has been one violation of the opacity standard from these emission units in the past five years. Therefore, since these emission units are subject to PM RACT, the facility should continue to perform stack testing once every five years in order to demonstrate compliance with the 0.03 gr/dscf emissions limitation specified in Rule 62-296.711, F.A.C.

CONCLUSION

This project renews Title V air operation permit No. 0570024-020-AV, which was issued on December 5, 2011. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.