Title V Air Operation Permit Revision
Permit No. 0570092-017-AV

APPLICANT

The applicant for this project is Kinder Morgan Bulk Terminals, Inc. The applicant's responsible official and mailing address are: Arthur Rudolph, Vice President of Operations, Kinder Morgan Bulk Terminals, Inc., 1500 Greenleaf Street, Charleston, SC 29405.

FACILITY DESCRIPTION

The applicant operates the existing Port Sutton Terminal, which is located in Hillsborough County at 4310 Pendola Point Road, Tampa, Florida.

The Port Sutton Terminal receives bulk materials from ships, barges, or railcar. Material received by ship (EU 010) is transferred via clamshell into an onshore hopper (EU 011), which is equipped with 4' high steel panel windscreens. A 1500 Series E-Crane, (Model 9317 B) ship unloader associated with EU 011 and EU 019 (Clamshell to Ship's/Barge's Hold) is an electric hydraulic machine, which utilizes electricity for power, and is equipped to utilize either a 7.5 yd or a 10 yd bucket. A series of six covered conveyor belts transfer the material from the onshore hopper to one of four storage buildings (EU 012, 013, 014, and 103). Material can also be unloaded via covered conveyors (EU 020).

Material received by railcars is unloaded unto a grate (EU 103), which directs the material unto the undercar conveyor in order to transfer the material to the buildings using the covered conveyor belts (EU 102). The railcar unloading station also includes the unloading of material from trucks. Material can also be transferred via the same covered conveyor belts, between buildings. The material is loaded out from each building by conveyor belts into either trucks or railcars. Building Nos. 1 and 2 have one truck load out area each and one truck/railcar load out area each (EU 015 and 016). Building Nos. 3 and 4 have one truck/railcar load out area each (EU 017 and 104). Storage of ammonium nitrate in Building Nos. 2 and 4 have all required safety upgrades such as a fire suppression system and the addition of a non-combustible coating on the paved floors to inhibit product absorption. The existing conveyors are utilized to move the material to Building No. 2. The facility also loads material from the onshore hopper directly into trucks (Direct Hit) via covered conveyor belts (EU 015). The Port Sutton Terminal can also load material into a ship or barge. A front end loader dumps material onto a windscreened pad on the dock (EU 018). The material is then transferred by clamshell into the ship's hold (EU 019).

The Hartford Street Terminal, which is located approximately one mile east of the Port Sutton Terminal, is also a material handling facility. Material, which is divided into nine groups, is delivered to the Hartford Street Terminal by truck or railcar. The truck dumps material from Groups I and II onto a product pad and a front end loader transfers the material into a hopper. From the hopper, material is transferred in a partially enclosed conveyor belt to another partially enclosed conveyor belt, which then conveys material to either Storage Building No. 1 or to Storage Building No. 2. Railcars unload directly into Storage Building Nos. 1 and 2. Each Storage Building Nos. 1 or 2 has one truck/railcar load out area. Material from Groups IV through IX is unloaded from trucks directly into open storage piles to then be transferred via front end loader into trucks for shipment offsite. However, salt, which is in Group VI, is stored in the Salt Storage Building. A truck unloads material inside of the building and the material is stacked with bulldozers or front end loaders within the building. Front end loaders load trucks with salt inside of the building for shipment offsite.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

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

Draft/Proposed Title V Air Operation Permit Revision issued September 22, 2001
Application for a Title V Air Operation Permit Revision received June 29, 2011
Additional Information Request: N/A
Notice of Intent to Issue Air Permit issued September 22, 2001
Public Notice Published **[Month day, year]**

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as a minor 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 operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.
NESHAP: The facility does not operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.
CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

PROJECT REVIEW

This Title V Air Operation Permit Revision is for the purpose of incorporating the AC Permit No. 0570092-016-AC into the current Title V Operating Permit 0570092-014-AV.

The AC Permit gave authorization to the facility to replace the Model 61-B Bucyrus Ship Unloader, which is associated with EU 011 - Clamshell to Hopper Transfer Point and EU 019 - Clamshell to Ship's/Barge's Hold, with a new 1500 Series E-Crane, Model 9317 B Ship Unloader. Also, the AC Permit authorized the replacement of the current 4' high hopper windscreens made out of portable tarp material with permanent 4' high steel panel windscreens; authorized the storage of ammonium nitrate in the EU 013 - Building No. 2; and authorized the temporary unloading of trucks at the EU 101 - Railcar Unloading Station. In addition, the AC Permit re-authorized the handling of phosphate rock.

In the Title V Permit Revision Application, the facility requested to permanently be allowed to unload materials by trucks at EU 101, instead of being performed on a temporary basis as stated in the AC Permit. This will give the facility more operational flexibility during times when there is no vessel traffic. The truck unloading operation will be similar to the railcar unloading operation with the use of a portable hopper that will be placed on the railcar grate in order to allow trucks to back-in and dump the loads in the existing railcar unloading shed (EU 101), with very minimal emissions in the partially enclosed building. Therefore, based on the review of this request, EPC staff will incorporate this minor change in the permit and will change the name of the EU 101 as follows:

From: Railcar & Temporary Truck Unloading Station for Building Nos. 1 & 2
To: Railcar & Truck Unloading Station for Building Nos. 1 & 2.

Also, the facility has a diesel fueled compression ignition (CI) reciprocating internal combustion engine (RICE) at the site, which is not reflected in the Title V Permit. This CI RICE (399 HP, Cummins Inc., Model QSL9-G3 NR3) was manufactured in November 2008. This CI RICE is used to provide emergency power for the onsite Stormwater Treatment System in case of a power loss from the primary power provider. This CI RICE is subject to NSPS Subpart IIII (*Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*) since it it was manufactured after April 1, 2006. However, this CI RICE is not subject to the NESHAP, Subpart ZZZZ (*National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*) pursuant to 40 CFR 63.6590(c)(1) since it is classified as a new stationary RICE located at an area source of HAP, and is only required to meet with the requirements of Subpart IIII. The NSPS requirements will be reflected in Appendix ICE of the Title V Permit Revision.

CONCLUSION

This project is to revise the Title V air operation permit No. 0570092-014-AV, which was issued on July 16, 2008. 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.