

## STATEMENT OF BASIS

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### Title V Air Operation Permit Renewal Permit No. 0570092-018-AV

#### APPLICANT

The applicant for this project is Kinder Morgan Bulk Terminals, Inc. The applicant's responsible official and mailing address are: Rodney Palmer, Director of Operations, Kinder Morgan, 5321 Hartford Street, Tampa, FL 33619.

#### FACILITY DESCRIPTION

The applicant operates the existing Port Sutton Terminal that consists of two material handling facilities located in Hillsborough County; the Port Sutton Terminal facility located at 4310 Pendola Point Road, Tampa, FL 33619 and the Hartford Street Terminal facility located at 5321 Hartford Street, Tampa, FL 33619, which is approximately one mile east of the Port Sutton Terminal facility.

The Port Sutton Terminal receives bulk materials from ships, barges, trucks, containers or railcars. 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 truck or container can be unloaded into a storage building or unloaded on the windscreened pad at the dock and transferred via clamshell into the onshore hopper (EU 011).

Material received by railcars is unloaded into a grate (EU 101), which directs the material into the underground conveyor in order to transfer the material to the buildings using the covered conveyor belts (EU 102). The railcar unloading station also includes truck unloading of material. 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. Materials are unloaded from trucks directly into open storage piles to then be transferred via front end loader into trucks for shipment offsite. Storage Building No. 3 (Northeast) receives material by truck inside of the building and the material is stacked with bulldozers or front end loaders within the building. Front end loaders load trucks inside of the building for shipment offsite.

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

### PROJECT DESCRIPTION

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

### PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received December 3, 2012

Additional Information Requested: N/A

### PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is identified as an area 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 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 Renewal is for the renewal of Permit No. 0570092-017-AV, which was issued on December 2, 2011 to incorporate Permit No. 0570092-016-AC into the Title V operation permit. Changes to the Title V Permit are denoted below.

The facility currently has a CI RICE (399 HP Cummins Inc. Model QSL9-G3 NR3) at Port Sutton Terminal site used as an emergency power generator to provide electricity for the site in case of a power loss from the primary power provider. The CI RICE is subject to NSPS Subpart IIII (*Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*) since 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. However, pursuant to 40 CFR 63.6590(c)(1), it is only required to meet with the requirements of 40 CFR 60 Subpart IIII. The NSPS requirements have been be reflected in Appendix ICE of the current Title V Permit. The NSPS requirements have been be reflected in Appendix ICE of the current Title V Permit.

According to the Title V Permit Renewal Application, the facility has a Fire Pump at the Hartford Street site, which is not reflected in the current permit. The Fire Pump is powered by a diesel fueled CI RICE (104 HP, Worthington Corp., Model No. Size 5), and is used for emergency, in the event of a fire, to deliver water to the site. This RICE is not subject to the NSPS Subpart IIII since it was manufactured before April 1, 2006. However, this CI RICE is

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subject to the NESHAP, Subpart ZZZZ pursuant to 40 CFR 63.6590(a)(1)(iii) since it is classified as an existing stationary RICE located at an area source of HAP. The main requirements from this rule for this Fire Pump RICE are operation and maintenance practices. The NESHAP requirements will be reflected in Appendix ICE of the Title V Permit Renewal.

In the Title V Permit Renewal Application, the facility requested the removal of the reference in the permit concerning the storage of GTSP that is less than 72 hours old in accordance with NSPS, Subpart X (Phosphate Fertilizer Industry: Granular Triple Superphosphate Storage Facility). After reviewing Subpart X, which was amended on October 17, 2000, the facility is not subject to the NSPS, Subpart X, pursuant to 40 CFR 60.241(a) and (d) [Definitions] and 62.242(b), since the facility does not store fresh GTSP (defined as GTSP produced within the preceding 72 hours). Therefore, Specific Condition Nos. A.8 and B.5, as well as the requirements from Subpart X in the current permit have been removed.

Also, the facility requested some changes and corrections to the Facility Description in the current permit: (1) to correct and clarify that all of the permitted materials can be stored in Building No. 3 at Hartford Street, instead of stating that salt is the only material that can be stored in the building; and (2) to correct and clarify that all of the permitted materials are unloaded from trucks directly into open storage piles at the Hartford Street site, instead of stating that only the materials from Group IV to IX are unloaded from trucks to open piles. After review, EPC staff has no objection to the requested updates to the Facility Description in this permit renewal.

### CONCLUSION

This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.