

## STATEMENT OF BASIS

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### Title V Air Operation Permit Revision Permit No. 0210031-031-AV

#### APPLICANT

The applicant for this project is Breitburn Florida LLC. The applicant's responsible official and mailing address are: Mr. Richard Stechmann, Florida Business Unit Manager, Breitburn Florida LLC, Raccoon Point, P.O. Box 3236, Immokalee, Florida 34143.

#### FACILITY DESCRIPTION

The applicant operates the existing Raccoon Point, which is located in Collier County 60 miles SE of Naples and 11 miles N of US 41 in Florida: Latitude 25° 58' 45" N; Longitude 80° 54' 13" W.

**Project:** The applicant applied on August 12, 2013 to the Department for a Title V air operation permit revision. This is a revision of Title V air operation permit No. 0210031-031-AV. This permit revision incorporates air construction permit no. 0210031-029-AC and revised federal regulations of 40 CFR 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

The existing facility is a crude oil and natural gas production facility. With the exception of one (1) well which has a conventional rod and positive displacement pump, the submersible pumps for the oil production wells are electrical with electricity furnished by a gas turbine or engine/generator sets. The existing facility consists of fourteen reciprocating internal combustion engines (RICE) [ten spark ignition (SI), four compression ignition (CI)] and one turbine. Four engines are equipped with non-selective catalytic reduction (NSCR) three way catalyst, one engine is equipped with an oxidation catalytic converter, and one engine is equipped with both an oxidation catalyst and a selective catalytic reduction. The facility has six (6) crude oil storage tanks. A vapor recovery system which collects vapors from the storage tanks. A flare burns excess produced gas or excess vapors from the storage tanks. The facility has a natural gas treatment system that consists of two (2) adsorption beds which operate in series to remove H<sub>2</sub>S from the produced natural gas. The treatment system has a design H<sub>2</sub>S removal efficiency of 99.6%. The facility demonstrated that the produced natural gas does meet the definition of natural gas per Subpart GG.

The engines are subject to 40 CFR 60 Subparts A, GG and IIII, General Provisions, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, and Standards of Performance for Stationary Gas Turbines, respectively; 40 CFR 63 Subparts A and ZZZZ, General Provisions and National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, respectively.

The existing facility is a Prevention Significant Deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C.

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

Renewed Title V Air Operation Permit issued **January 3, 2012**

Application for a Title V Air Operation Permit Revision **August 12, 2013**

#### 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 a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

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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 operates 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.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

### PROJECT REVIEW

This revision incorporated air construction permit No. 0210031-029-AC and revised federal regulations for 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ. The changes to the permit and subject to comment are shown is the permit in *italic and highlighted yellow*.

### CONCLUSION

This project revises Title V air operation permit No. 0210031-026-AV, which was issued on **January 3, 2012**. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.