TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Breitburn Florida, LLC
P.O. Box 3236
Immokalee, Florida 34143

North Bear Island Tank Battery
Facility ID No. 0210090

PROJECT

Project No. 0210090-013-AC
Application for Minor Source Air Construction Permit
Increase Production to 372,300 bbl/year

COUNTY

Collier, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Engineering and Permitting Section
South District Office
2295 Victoria Avenue
Fort Myers, FL 33901

October 22, 2013

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Breitburn Florida, LLC is an existing company that is operating on a Federally Enforceable Operating Permit (FESOP), permit No. 0210090-010-AF. This is an oil production tank battery facility, which is categorized under Standard Industrial Classification Code No. 1311. The facility is located in Collier County East of State Road 29 and 12.5 miles southeast of Immokalee in Sunniland, Florida. The UTM coordinates are Zone 17, 470.07 km East, and 2904.23 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

The maximum annual crude throughput rate for the facility is to be increased from 200,750 bbl per year to 372,300 bbl year. To accommodate this increased production, an additional FWKO (free water knock-out) vessel and an "Unfired" treater is to be added to the tank battery facility. (Vapors from this additional will be vented to the existing smokeless flare. The remaining existing tank battery infrastructure (i.e., crude oil storage tanks and flare) is adequately sized to process the increase in crude oil throughput rates. This facility was originally given a "FESOP" classification because of after-the-fact construction, and limited to 200,750 bbl year production. The facility will remain a "FESOP", because potential pollutant emissions will remain below a Title V threshold, however the increased production change from 200,750 bbl/year to 372,300 bbl/year is allowed. (**Throughput limit is "capped" for Federally Enforceable (FESOP) classification requirement).**

The potential to emit from flare for volatile organic compound (VOC) is 22.1 tons per year. (VOC emissions from the tanks are routed to the existing flare).

Processing Schedule

October 1, 2013 Received the application for a minor source air pollution construction permit.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

VOC emissions at 22.1 tpy from the tanks are routed to a smokeless flare. VOC emissions at 23.5 tpy from the crude oil loading station and 10.8 tpy for loading crude oil to the tanks, are non-contained and are ambient.

As provided in the application, the following table summarizes potential emissions and PSD applicability for the project.

Table A. Potential Emissions (Tons/Year) and PSD Applicability

Pollutant	**Project Potential Emissions (TPY)**	**Significant Emissions Rate (TPY)**	**Subject To PSD?**
CO	15.1	100	No
NO_X	2.8	40	No
PM/PM_{10}	0.0	25/15	No
SO_2	12.6	40	No
VOC	59.3	40	No

As shown in the above table, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review.

EMISSIONS SUMMARY (tpy)

SOURCE	**NOx**	**CO**	**VOC**	**SO2**
Battery Flare (EU001)	2.8	15.1	22.1	12.6
Five (5) Crude Oil Storage Tanks (EU002)	N/A	N/A	*	N/A
Loading Crude Oil Storage Tanks (EU003)	N/A	N/A	10.8	N/A
Truck Loading Station (EU003)	N/A	N/A	23.5	N/A
Battery Fugitive VOCs (EU003)	N/A	N/A	2.2	N/A
Satellite loading area fugitive VOCs (EU003)	N/A	N/A	0.61	N/A
TOTAL	**2.8**	**15.1**	**59.3**	**12.6**

*VOC emissions included with EU00

3. APPLICATION REVIEW

Discussion of Emissions

Emissions are below a title V threshold. (See chart above).

Federal FESOP Provisions

This facility was originally given a "FESOP" classification because of after-the-fact construction, and limited to 200,750 bbl year production. The facility will remain a "FESOP", however because potential pollutant emissions will remain below a Title V threshold, the increased production change from 200,750 bbl/year to 372,300 bbl/year is allowed. The new limitation is 372,300 bbl/yr. production rate. (**Throughput limit is "capped" for Federally Enforceable (FESOP) classification requirement).**

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Carter B. Endsley, P.E. is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's South District Office at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33902.