Title V Air Operation Permit Renewal
Permit No. 0210031-026-AV

APPLICANT

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

FACILITY DESCRIPTION

The applicant operates the Raccoon Point, which is located in Collier County 60 Miles Southeast of Naples and 11 Miles North of U.S. 41 in Florida.

The existing facility is a crude oil and natural gas production facility. The existing facility consists of a flare, crude oil storage tanks, eleven reciprocating internal combustion engines [six four stroke rich burn (4SRB) spark ignition (SI) RICE < 500 horsepower (HP), two 4SRB SI RICE > 500 HP and three compression ignition (CI) ICE >500 HP], and one gas turbine. To control emissions, one of the 4SRB SI RICE engines < 500 HP is equipped with a three way catalytic converter, the two SI 4SRB >500 HP engines are with either a three-way catalytic converter or a three way non-selective catalytic converter (NSCR) and one of the CI engines is equipped with a oxidation catalytic converter. The engines burn "casing" natural gas, propane, and fuel oil. The following pollutants have the potential to be emitted from the facility: carbon monoxide, nitrogen oxide, sulfur dioxide, volatile organic compounds, particulate matter and formaldehyde. The engines are subject to 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 turbine is subject to 40 CFR 60 Subparts A and GG, General Provisions and Standards of Performance for Stationary Gas Turbines, 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

Changes made as a result of the revision include reformatting the permit and streamlining.

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

Title V Air Operation Permit issued **04/07/2006**
Title V Air Operation Permit Revision issued **01/12/2010**
Application for a Title V Air Operation Permit Renewal received **08/23/2010**
Additional Information Request dated **10/202010**
Additional Information Response received **03/04/2011**
Additional Information Request dated **03/28/2011**
Additional Information Response received **06/14/2011**

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.

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.

Siting: No emission units at the facility were originally certified pursuant to the power plant siting provisions of Chapter 62-17, F.A.C.

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

PROJECT REVIEW

Changes that were made as part of this renewal were reformatting, replacement of TV-6 with new Appendix TV, and streamlining of EU sections by moving common conditions to the new appendices.

CONCLUSION

This project renews Title V air operation permit No. 0210031-015-AV, which was issued January 7, 2006. 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.