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 is: 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 facility, 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 facility consists of five (5) well pads, three (3) of which are active. Each well pad has one to three oil production wells [six (6) total]. With the exception of one (1) well which has a conventional rod and positive displacement pump, the submersible pumps for the production wells are electrical with electricity furnished by a gas turbine or engine/generator sets. The existing facility consists of thirteen (13) reciprocating internal combustion engines (RICE) [ten (10) spark ignition (SI), three compression ignition (CI)] and one turbine. Four (4) engines are equipped with non-selective catalytic reduction (NSCR) three way catalyst and one (1) engine is equipped with an oxidation catalytic converter. The facility has six (6) crude oil storage tanks and a flare which burns excess produced gas or excess vapors from the storage tanks. The produced crude oil/natural gas is routed to free water knockout vessels, treaters, then to storage tanks. The facility includes a vapor recovery system which collects 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_2S from the produced natural gas. The manufacturer of the adsorption beds is SulfurTreat Company. The treatment system has a design H_2S removal efficiency of 99.6%. The facility demonstrated that the produced natural gas does meet the definition of natural gas per 40 CFR 60 Subpart GG.

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**
Intent to Issue issued **07/07/2011**
Comments on draft received **08/10/2011**
Revised Draft Issued **10/11/2011**
Notice of Intent Issued **10/17/2011**

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

EU004, EU008, EU009, EU012, EU020, EU023, EU024, EU029, EU030 and EU031 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. EU004, EU008, EU009, EU012, EU020 and EU031 are spark ignition RICE and must be in compliance with Subpart ZZZZ by October 19, 2013. EU023, EU024, EU029 and EU030 are compression ignition RICE and must be in compliance with Subpart ZZZZ by May 3, 2013. Applicable Subpart ZZZZ requirements include operation and maintenance requirements as well as emission limitations for CO and formaldehyde emissions.

EU013 is subject to 40 CFR 60 Subparts A and GG, General Provisions and Standards of Performance for Stationary Gas Turbines, respectively. Monitoring the nitrogen content of the fuel being fired as well as fuel sampling to determine the daily fuel nitrogen concentrations as required by Subpart GG is not required if the owner or operator elects to not claim an allowance for fuel bound nitrogen in accordance with Subpart GG (Federal Register Vol. 69, No. 130, July 8, 2004, page 41348). Per the Title V renewal application and correspondence dated June 6, 2011, the owner or operator does not claim an allowance for fuel bound nitrogen. Additionally, during the application renewal process, the applicant demonstrated (gas sample test date May 3, 2011, correspondence dated June 6, 2011) in accordance with Subpart GG that the produced natural "casing" gas meets the Subpart GG definition for "natural gas." Therefore, the owner or operator is not required to monitor the total sulfur content of the gaseous fuel being fired in the turbine. Fuel oil, however, must still comply with emissions standards and monitoring in accordance with Subpart GG.

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

This permit incorporates air construction permit nos. 0210031-025-AC and 0210031-028-AC. 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. Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

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.