Florida Department of
Environmental Protection
South District Office
Post Office Box 2549
Fort Myers, Florida 33902-2549

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

PERMIT REVISION and MODIFICATION

November 14, 2011

CERTIFIED MAIL 7010 1870 0001 8477 1226
RETURN RECEIPT REQUESTED

PERMITTEE

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

Authorized Representative:
Mr. Richard H. Stechmann, Asset Manager

Air Permit No. 0210031-028-AC
Permit Expires: **May 13, 2012**
Minor Air Construction Permit
Raccoon Point
AC Permit Revision and
Modification

PROJECT

This is the final air construction permit, which revises and modifies Permit Nos. AC11-255336, 0210031-002-AC, 0210031-003-AC, 0210031-005-AC, 0210031-006-AC, 0210031-010-AC, 0210031-012-AC, 0210031-019-AC, 0210031-024-AC and 0210031-025-AC for the following items: remove emissions limitations for which there are no rule applicability, remove fuel usage limitations, and add the use of commercial natural gas to non-diesel engines. Raccoon Point is a crude oil and natural gas production facility (Standard Industrial Classification No. 1311). The facility is located in Collier County 60 miles southeast of Naples and 11 miles north of U.S. 41, Southeast of Naples, Florida. The UTM coordinates are Zone 17, 509.6 km East, and 2873.4 km North.

This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions/Modifications). As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Fort Myers, Florida

_____ _____

Jon M. Iglehart
Director of
District Management

Date

JMI/SRM/jw

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) was sent by certified mail (*) and electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Mr. Richard H. Stechmann*: rstechmann@breitburn.com
Mr. Thomas W. Davis, P.E.: tdavis@ectinc.com

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____ _____
(Clerk) (Date)

FACILITY DESCRIPTION

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 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]. To control emissions four (4) RICE are equipped with a non-selective catalytic reduction (NSCR) three way catalyst and one of the CI engines is equipped with an oxidation catalytic converter. The facility has six 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.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PROPOSED PROJECT

The proposed project revises and modifies Permit Nos. AC11-255336, 0210031-002-AC, 0210031-003-AC, 0210031-005-AC, 0210031-006-AC, 0210031-010-AC, 0210031-012-AC, 0210031-019-AC, 0210031-024-AC and 0210031-025-AC for the following items: remove emissions limitations for which there are no rule applicability, removes fuel usage limitations, and adds the use of commercial natural gas to non-diesel engines.

Subsection A. Revisions

The following permit conditions are revised as indicated.

Permit Being Modified: Permit No. AC11-255336

Affected Emissions Units: EU001, EU008, EU009

Specific Condition 10: **This condition is hereby changed as follows:**

From: Compliance with the emission limits in Specific Conditions 8 and 9 shall be assumed if the visible emissions from any point does not exceed 10% opacity, and that best operational practices for minimizing air pollutants are followed. If visible emissions exceed 10% opacity, EPA test methods, or other Department approved methods, shall be used to determine compliance of the affected points.

To: This condition is hereby deleted.

Specific Condition 9: **This condition is revised** to remove emission limitations from the following two emission points: Waukesha 817G 100 hp and electric generator.

Permit Being Modified: Permit No. 0210031-002-AC

Affected Emissions Unit: EU013

Specific Condition 3: **This condition is hereby changed as follows:**

From: Method of Operation – Fuel. Natural (well casing) gas, Propane, or Diesel fuel oil are the fuels allowed to be burned during start-up and normal hours of operation. A maximum of 923,843 Gallons of No. 2 fuel oil (Worst-case fuel) for this unit is allowed to be burned in any twelve consecutive month period. [Rule 62-213.410, F.A.C.]

To: Method of Operation – Fuel. Natural (well casing) gas, commercial natural gas, propane or diesel fuel oil are the fuels allowed to be burned during start-up and normal hours of operation. [Permit No. 0210031-028-AC]

Specific Condition 4: **This condition is hereby changed as follows:**

From: Sulfur Dioxide emissions shall not exceed 6.9 lb/hr or 30.2 TPY. [40 CFR 60.333(a)]

a. No fuel shall be burned at this source which contain sulfur in excess of 0.5 percent by weight. [40 CFR 60.333(b)]

To: Fuel Sulfur Content. No fuels shall be burned at this source which contain sulfur in excess of 0.5 percent by weight. [Permit No. 0210031-028-AC]

Specific Condition 5**: This condition is hereby changed as follows:**

From: Carbon Monoxide emissions shall not exceed 8.49 lb/hr or 37.1 TPY.

To: This condition is hereby deleted.

Specific Condition 6: **This condition is hereby changed as follows:**

From: Nitrogen Oxide NO_X emissions shall not exceed 8.4 lb/hr or 36.8 TPY. [Construction Permit 0210031-002-AC, NSPS Subpart GG 40 CFR 60]

Nitrogen oxides emissions, expressed as NO_X, shall not exceed:

$$STD = 0.0150\ (14.4)/Y + F$$

where:

STD=allowable NOx emissions (percent by volume at 15 percent oxygen and on a dry basis). Y=manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F=NOx emission allowance for fuel-bound nitrogen as defined in 40 CFR 60.332(a)(3).

[40 CFR 60.332(a)(2)]

a. F shall be defined according to the nitrogen content of the fuel as follows:

Fuel-bound nitrogen (% by weight)	F (NO_X% by volume)
$N \leq 0.015$	0
$0.015 < N \leq 0.1$	0.04(N)
$0.1 < N \leq 0.25$	0.004+0.0067(N-0.1)
$N > 0.25$	0.005

where:

N=the nitrogen content of the fuel (percent by weight).

or:

The applicant may use custom fuel-bound nitrogen allowances developed by the manufacturer for each model of gas turbine they manufacture provided that the allowances were substantiated with the appropriate data, approved for use by the Administrator before the initial performance test required by 40 CFR 60.8, and that the notices of approval of custom fuel-bound nitrogen allowances were published in the *FEDERAL REGISTER*.

[40 CFR 60.332(a)(3); Permit No. 0210031-028-AC]

To: Nitrogen oxides emissions, expressed as NO_X, shall not exceed:

$$STD = 0.0150\ (14.4)/Y + F$$

where:

STD=allowable NOx emissions (percent by volume at 15 percent oxygen and on a dry basis). Y=manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F=NOx emission allowance for fuel-bound nitrogen as defined in 40 CFR 60.332(a)(4).

[40 CFR 60.332(a)(2)]

a. F shall be defined according to the nitrogen content of the fuel as follows:

Fuel-bound nitrogen (% by weight)	F (NO_X% by volume)
$N \leq 0.015$	0
$0.015 < N \leq 0.1$	0.04(N)
$0.1 < N \leq 0.25$	0.004+0.0067(N-0.1)
$N > 0.25$	0.005

where:

N=the nitrogen content of the fuel (percent by weight).

or:

The applicant may use custom fuel-bound nitrogen allowances developed by the manufacturer for each model of gas turbine they manufacture provided that the allowances were substantiated with the appropriate data, approved for use by the Administrator before the initial performance test required by 40 CFR 60.8, and that the notices of approval of custom fuel-bound nitrogen allowances were published in the *FEDERAL REGISTER*.

[40 CFR 60.332(a)(4); Permit No. 0210031-028-AC]

***Specific Condition 7*: This condition is hereby changed as follows:**

From: Particulate Matter (PM) emissions are estimated to be 0.84 lb/hr or 3.65 TPY. [Construction Permit 0210031-002-AC]

To: This condition is hereby deleted.

***Specific Condition 9*: This condition is hereby changed as follows:**

From: Volatile Organic Compound (VOC) emissions are estimated to be 0.97 lb/hr or 4.25 TPY. [Construction Permit 0210031-002-AC]

To: This condition is hereby deleted.

***Specific Condition 16*: This condition is hereby changed as follows:**

From: Compliance with the Emission Limitations and Standards, Specific Conditions 5, 7, and 9 shall be assumed if the visible emissions from this emission point do not exceed 20% opacity, and that best operation practices from minimizing air pollutants are followed. If visible emissions exceed 20% opacity, EPA test methods, or other Department approved methods, shall be used to determine compliance of the affected points. [Construction Permit 0210031-002-AC]

To: This condition is hereby deleted.

Permit Being Modified: Permit No. 0210031-010-AC

Affected Emissions Unit: EU004

***Specific Condition 4*: This condition is hereby changed as follows:**

From: Carbon Monoxide emissions shall not exceed 1.5 lb/hr or 6.7 TPY for each engine. [Applicant request dated November 13, 2000]

To: This condition is hereby deleted.

***Specific Condition 5*: This condition is hereby changed as follows:**

From: Nitrogen Oxide NO_X emissions shall not exceed 1.8 lb/hr or 7.7 TPY for each engine. [Applicant request dated November 13, 2000]

To: This condition is hereby deleted.

***Specific Condition 6*: This condition is hereby changed as follows:**

From: Particulate Matter (PM) emissions shall not exceed 0.0009 lb/hr or 0.0038 TPY for each engine. [Applicant request dated November 13, 2000]

To: This condition is hereby deleted.

***Specific Condition 7*: This condition is hereby changed as follows:**

From: Sulfur Dioxide (SO_2) emissions shall not exceed 0.00049 lb/hr or 0.0021 TPY for each engine. [Applicant request dated November 13, 2000]

To: This condition is hereby deleted.

***Specific Condition 9*: This condition is hereby changed as follows:**

From: Volatile Organic Compound (VOC) emissions shall not exceed 0.025 lb/hr or 0.11 TPY for each engine. [Applicant request dated November 13, 2000]

To: This condition is hereby deleted.

***Specific Condition 10*: This condition is hereby changed as follows:**

From: Compliance with the Emission Limitations and Standards, Specific Conditions 4, 5, 6, 7, and 9 shall be assumed if the visible emissions from this emission point do not exceed 20% opacity, and that best operation practices for minimizing air pollutants are followed. If visible emissions exceed 20% opacity, EPA test methods, or other Department approved methods, shall be used to determine compliance of the affected points. [Applicant request dated November 13, 2000]

To: This condition is hereby deleted.

Permit Being Modified: Permit No. 0210031-003-AC

Affected Emissions Units: EU020

***Specific Condition 3:* This condition is hereby changed as follows:**

From: Method of Operation – Fuel. Natural (well casing) gas, commercial natural gas, and propane are the fuels allowed to be burned during star-up and normal hours of operation. A maximum of 500,600 gallons of propane or 25.5 MMCF of natural gas for each unit is allowed to be burned in any twelve consecutive month period. [Construction permit application received April 6, 2000]

To: Method of Operation – Fuel. Natural (well casing) gas or propane are the fuels allowed to be burned during start-up and normal hours of operation. [Permit No. 0210031-028-AC]

***Specific Condition 4*: This condition is hereby changed as follows:**

From: Nitrogen Oxide emissions shall not exceed 1.4 lb/hour or 5.9 tons/year for each engine. [Construction permit application received April 6, 2000]

To: This condition is hereby deleted.

***Specific Condition 5*: This condition is hereby changed as follows:**

From: Carbon Monoxide emissions shall not exceed 2.9 lb/hour or 12.9 tons/year for each engine. [Construction permit application received April 6, 2000]

To: This condition is hereby deleted.

***Specific Condition 13*: This condition is hereby changed as follows:**

From: Compliance with the emission limitations stated in Specific Conditions 4 and 5 shall be assumed if the visible emissions do not exceed 20% opacity. [Construction permit application received April 6, 2000]

To: This condition is hereby deleted.

Permit Being Modified: Permit No. 0210031-005-AC

Affected Emissions Units: EU023

Subsection A. Revisions

***Specific Condition 2*: This condition is hereby changed as follows:**

From: Method of Operation – Fuel. Natural (well casing) gas, commercial natural gas and propane are the only fuels allowed to be burned during start-up and normal hours of operation. A maximum of 28.10 mm/ft^3 of natural (well casing) gas or propane for each unit is estimated to be burned annually. [Rule 62-213.410, F.A.C.]

To: Method of Operation – Fuel. Natural (well casing) gas or propane are the only fuels allowed to be burned during start-up and normal hours of operation. [Permit No. 0210031-028-AC]

***Specific Condition 4*: This condition is hereby changed as follows:**

From: Carbon Monoxide emissions shall not exceed 3.8 lb/hr or 16.8 TPY. [Applicant request dated June 21, 2000]

To: This condition is hereby deleted.

***Specific Condition 5*: This condition is hereby changed as follows:**

From: Nitrogen Oxide NO_X emissions shall not exceed 1.3 lb/hr or 5.5 TPY. [Applicant request dated June 21, 2000]

To: This condition is hereby deleted.

***Specific Condition 6*: This condition is hereby changed as follows:**

From: Particulate Matter (PM) emissions shall not exceed 0.01 lb/hr or 0.03 TPY. [Applicant request dated June 21, 2000]

To: This condition is hereby deleted.

***Specific Condition 7*: This condition is hereby changed as follows:**

From: Sulfur Dioxide SO_2 emissions shall not exceed 0.005 lb/hr or 0.02 TPY. [Applicant request dated June 21, 2000]

To: This condition is hereby deleted.

***Specific Condition 9*: This condition is hereby changed as follows:**

From: Volatile Organic Compound (VOC) emissions shall not exceed 0.3 lb/hr or 1.2 TPY. [Applicant request dated June 21, 2000]

To: This condition is hereby deleted.

***Specific Condition 10*: This condition is hereby changed as follows:**

From: Compliance with the Emission Limitations and Standards, Specific Conditions 4, 5, 6, 7, and 9 shall be assumed if the visible emissions from this emission point do not exceed 10% opacity, and that best operation practices for minimizing air pollutants are followed. If visible emissions exceed 10% opacity, EPA test methods, or other Department approved methods, shall be used to determine compliance of the affected points. [Applicant request dated June 21, 2000]

To: This condition is hereby deleted.

Permit Being Modified: Permit No. 0210031-006-AC

Affected Emissions Units: EU024

***Specific Condition 16*: This condition is hereby changed as follows:**

From: Compliance with the emission limitations stated in Specific Conditions 4, 5, 6, and 9 shall be assumed if the visible emissions do not exceed 20% opacity.

To: This condition is hereby deleted.

Permit Being Modified: Permit No. 0210031-012-AC

Affected Emissions Units: EU012, EU024

***Specific Condition A.4*: This condition is hereby changed as follows:**

From: Nitrogen oxides – NO_X emissions shall not exceed 1.540 pounds per hour per engine or 6.760 tons per year per engine (13.520 tons per year for the Emission Unit). [Rule 62-210.200(PTE), F.A.C., and Permit Application dated March 29, 2001]

To: This condition is hereby deleted.

***Specific Condition A.5*: This condition is hereby changed as follows:**

From: Carbon Monoxide - CO emissions shall not exceed 1.540 pounds per hour per engine or 6.760 tons per year per engine (13.520 tons per year for the Emission Unit). [Rule 62-210.200(PTE), F.A.C., and Permit Application dated March 29, 2001]

To: This condition is hereby deleted.

***Specific Condition A.6*: This condition is hereby changed as follows**:

From: Volatile Organic compound. – VOCs emissions shall not exceed 0.190 pounds per hour per engine or 0.845 tons per year per engine (1.690 tons per year for the Emission Unit). [Rule 62-210.200(PTE), F.A.C., and Permit Application dated March 29, 2001]

To: This condition is hereby deleted.

***Specific Condition C.2*: This condition is hereby changed as follows:**

From: Method of Operation – Fuel. Diesel fuel with a maximum sulfur content of 0.05% is allowed to be burned during start-up and normal hours of operation. A maximum of 460,000 gallons of diesel fuel is allowed to be burned in any twelve consecutive month period. This is an increase of 230,000 gallons per year over construction permit 0210031-006-AC, dated November 1, 2000. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

To: Method of Operation – Fuel. Diesel fuel with a maximum sulfur content of 0.05% is allowed to be burned during start-up and normal hours of operation. [Permit No. 0210031-028-AC]

***Specific Condition C.3:* This condition is hereby changed as follows:**

From: Nitrogen oxides. NO_X emissions shall not exceed 13.60 pounds per hour or 59.40 tons per year. [Rule 62-210.200(PTE), F.A.C., and Permit Application dated March 29, 2001]

To: This condition is hereby deleted.

***Specific Condition C.4*: This condition is hereby changed as follows:**

From: Carbon Monoxide. CO emissions shall not exceed 0.310 pounds per hour or 1.360 tons per year. [Rule 62-210.200(PTE), F.A.C., and Permit Application dated March 29, 2001]

To: This condition is hereby deleted.

***Specific Condition C.5*: This condition is hereby changed as follows:**

From: Volatile Organic compound. VOCs emissions shall not exceed 0.050 pounds pr hour or 0.24 tons per year. [Rule 62-210.200(PTE), F.A.C., and Permit Application dated March 29, 2001]

To: This condition is hereby deleted.

***Specific Condition 7*: This condition is hereby changed as follows:**

From: Particulate Matter. PM/PM_{10} emissions shall not exceed 0.300 pounds per hour or 1.30 tons per year. [Rule 62-210.200(PTE), F.A.C., and Permit Application dated March 29, 2001]

To: This condition is hereby deleted.

***Specific Condition 9*: This condition is hereby changed as follows:**

From: Sulfur dioxide. SO_2 emissions shall not exceed 0.370 pounds per hour or 1.640 tons per year. [Rule 62-210.200(PTE), F.A.C., and Permit Application dated March 29, 2001]

To: This condition is hereby deleted.

Permit Being Modified: Permit No. 0210031-019-AC

Affected Emissions Units: EU029, EU030

***Specific Condition 17:* This condition is hereby changed as follows:**

From: Method of Operation

Ultra Low Sulfur Diesel (ULSD) Fuel oil only, is to be used. (0.0015 % Sulfur by weight).
EU-029 Maximum Annual Rate at 779,600 gal/year.
EU-030 Maximum Annual Rate at 455,500 gal/year
[Rule 62-213.410.F.A.C.]

To: Method of Operation. The only authorized fuel shall be Ultra Low Sulfur Diesel (ULSD) Fuel oil with a maximum sulfur content of 0.0015 % sulfur by weight. [Permit No. 0210031-028-AC]

***Specific Condition 19:* This condition is hereby changed as follows:**

From: Estimated Emissions (not limited) for Reference Only

Nitrogen Oxide (NOx)

EU-029 ……..39.4 lb/hr. or 172.7 tons per year (TPY)

EU-030 …….…….17.5 lb/hr or 76.6 tons per year (TPY)

Nitrogen oxides emissions, expressed as NO_X, shall not exceed:

STD = 0.0150 (14.4)/Y + F

where:

STD=allowable NOx emissions (percent by volume at 15 percent oxygen and on a dry basis). Y=manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F=NOx emission allowance for fuel-bound nitrogen as defined in 40 CFR 60.332(a)(3).

[40 CFR 60.332(a)(2)]

a. F shall be defined according to the nitrogen content of the fuel as follows:

Fuel-bound nitrogen (% by weight) F (NO_X% by volume)

$N \leq 0.015$	0
$0.015 < N \leq 0.1$	0.04(N)
$0.1 < N \leq 0.25$	0.004+0.0067(N-0.1)
$N > 0.25$	0.005

where:

N=the nitrogen content of the fuel (percent by weight).

Carbon Monoxide (CO) Estimated (not limited) Emissions

EU-029 ……10.8 lb/hr. or 47.5 tons per year (TPY)

EU-030 …….. 2.9 lb/hr. or 12.9 tons per year (TPY)

Sulfur Dioxide Emissions

Diesel fuel oil burned is defined by the permittee application, to contain a maximum of 0.0015% Sulfur. Therefore the Sulfur Dioxide potential emissions, computed as 0.026 tons per year for EU-029 and 0.014 tons per year for EU-030 are considered insignificant.

Volatile Organic Compounds (VOC)..(NOT LIMITED)....(Insignificant)

Particulate Matter (PM)……(NOT LIMITED)....(Insignificant)

Visible Emissions (VE)……Shall not be equal to or greater than 20% opacity.

To: Visible Emissions (VE). VE shall not be equal to or greater than 20% opacity. [Permit No. 0210031-028-AC]

Permit Being Modified: Permit No. 0210031-024-AC

Affected Emissions Units: EU002

Specific Condition 3: **This condition is hereby changed as follows:**

From*:* Vapor Recovery Units Time Meters. Vapor recovery units shall be monitored by running-time meters or operation log records. Duty factors for the units shall be maintained at or above 0.95.

To: This condition is hereby deleted.

Permit Being Modified: Permit No. 0210031-025-AC

Affected Emissions Units: EU031

Specific Condition 6: **This condition is hereby changed as follows:**

From: Emissions Standards:

a. *Nitrogen Oxides (NO_X)*. NO_X emissions shall not exceed 4.0 pounds per hour (lbs/hr). [Permit No. 0210031-025-AC; Rules 62-212.400(12)(b) and (c), F.A.C.]
b. *Carbon Monoxide (CO)*. CO emissions shall not exceed 10.4 lb/hr. [Permit No. 0210031-025-AC, Rules 62-212.400(12)(b) and (c), F.A.C.]
c. *Volatile Organic Compounds (VOC)*. VOC emissions shall not exceed 2.6 lb/hr. [Permit No. 0210031-025-AC, Rules 62-212.400(12)(b) and (c), F.A.C.]
d. *Visible Emissions* (VE). VE emissions shall not exceed 10% opacity. [Permit No. 0210031-025-AC and Rule 62-4.070(3), F.A.C.]

To: Visible Emissions (VE). VE emissions shall not exceed 10% opacity. [Permit No. 0210031-028-AC and Rule 62-4.070(3), F.A.C.]

Specific Condition 9: **This condition is hereby changed as follows:**

From: Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), the emissions unit shall be tested to demonstrate compliance with the emissions standards for VE. If the annual compliance test for VE demonstrates compliance, the same federal fiscal year compliance testing shall be waived for NO_X, CO, and VOC. Testing shall be performed with produced natural gas ["casinghead (associated gas)"] as the fuel source. If the wellheads at the facility are not producing casinghead gas in sufficient quantity for operating the facility's engines then the facility may use the next worst case fuel that is authorized by this permit to demonstrate compliance. [Rules 62-297.310(7)(a)4, F.A.C. and 62-4.070(3), F.A.C.]

To: Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), the emissions unit shall be tested to demonstrate compliance with the emissions standards for **VE**. Testing shall be performed with produced natural gas ["casinghead (associated gas)"] as the fuel source. If the wellheads at the facility are not producing casinghead gas in sufficient quantity for operating the facility's engines then the facility may use the next worst case fuel that is authorized by this permit to demonstrate compliance. [Rules 62-297.310(7)(a)4, F.A.C. and 62-4.070(3), F.A.C.; Permit No. 0210031-028-AC]

Specific Condition 10: **This condition is hereby changed as follows:**

From: Compliance Tests Prior To Renewal. Compliance tests shall be performed for NO_X, CO, VOC, and VE once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Condition **A.6.** Testing is to be performed with produced natural gas ["casinghead (associated gas)"] as the fuel source. If the wellheads at the facility are not producing casinghead gas in sufficient quantity for operating the facility's engines then the facility may use the next worst case fuel that is authorized by this permit to demonstrate compliance. [Rules 62-210.300(2)(a), 62-297.310(7)(a), and 62-4.070(3), F.A.C.].

To: Compliance Tests Prior To Renewal. Compliance tests shall be performed for VE once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits in Specific Condition **A.6.** Testing is to be performed with produced natural gas ["casinghead (associated gas)"] as the fuel source. If the wellheads at the facility are not producing casinghead gas in sufficient quantity for operating the facility's engines then the facility may use the next worst case fuel that is authorized by this permit to demonstrate compliance. [Rules 62-210.300(2)(a), 62-297.310(7)(a), and 62-4.070(3), F.A.C.; Permit No. 0210031-028-AC]

Specific Condition 12: **This condition is hereby changed as follows:**

1. From: Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources (The method shall be based on a continuous sampling train.)
18	Measurement of Gaseous Organic Compound Emissions by Gas Chromatography (for concurrent use with EPA method 25A to deduct emissions of methane and ethane from the total hydrocarbon (THC) emissions measured by method 25A)

Method	Description of Method and Comments
25	Determination of Total Gaseous Nonmethane Organic Emissions as Carbon
25A	Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

To: Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60; Permit No. 0210031-028-AC]

***Specific Condition 13*: This condition is hereby changed as follows:**

From: NO_X Testing. The emissions unit shall demonstrate compliance for NO_X emissions using EPA Methods 7E and 1-4. [Permit No. 0210031-025-AC and Rule 62-4.070(3), F.A.C.]

To: This condition is hereby deleted.

***Specific Condition 14*: This condition is hereby changed as follows:**

From: CO Testing. The emissions unit shall demonstrate compliance for CO emissions using EPA Methods 10 and 1-4. [Permit No. 0210031-025-AC and Rule 62-4.070(3), F.A.C.]

To: This condition is hereby deleted.

***Specific Condition 15*: This condition is hereby changed as follows:**

From: VOC Testing. The emissions unit shall demonstrate compliance for VOC emissions using EPA Methods 25 or 25A and 18. [Permit No. 0210031-025-AC and Rule 62-4.070(3), F.A.C.]

To: This condition is hereby deleted.

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Subsection B. Modifications

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
004	One 80 HP SI RICE
008	Two 108 HP SI RICE (One is standby only)
009	Two 221 HP SI RICE (One is standby only)
012	Two 295 HP SI RICE
013	One 800 kW Gas Turbine
020	One 625 HP SI RICE
023	One 600 HP SI RICE
031	One 1,818 brake horsepower (bhp) SI RICE.

PERFORMANCE RESTRICTIONS

B.1. Authorized Fuel: The fuels that are allowed to be burned in these units during start-up and normal hours of operation are produced natural (well casing) gas, commercial natural gas, propane: EU013 is authorized to also burn No. 2 fuel oil with maximum sulfur content of 0.5%. [Permit No. 0210031-028-AC and Rule 62-210.200(PTE), F.A.C.]

B.2. Emission Unit Relocations. EU013 may be relocated within the Raccoon Point Facility as necessary in response to production requirements. [Rule 62-4.070(3), F.A.C., Permit No. 0210031-028-AC]