TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

North Bear Island
Facility ID No. 0210090

PROJECT

Permit No. 0210090-008-AC
Air Construction Permit
Crude Oil Storage Tank

COUNTY

Collier, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
South District Office
2295 Victoria Avenue
P.O. Box 2549
Fort Myers, Florida 33902

January 13, 2011

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 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.

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 proposed project is for the construction of one 5,000 bbl crude oil storage tank. The crude oil storage tank will have a shell height and diameter of 24.5 and 38.6 feet respectively, and a maximum liquid height of 24 feet. The maximum annual crude throughput rate for facility will remain unchanged at 200,750 bbl per year. The potential to emit for volatile organic compound (VOC) is 0.37 tons per year. This is an increase in VOC emissions for emission unit no. 002 (crude oil storage tanks). VOC emissions from the tank will routed to the existing flare.

Processing Schedule

November 3, 2010….Received the application for a minor source air pollution construction permit and application complete.

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

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	0	100	No
NO_X	0	40	No
PM/PM_{10}	0	25/15	No

Pollutant	Project Potential Emissions (TPY)	Significant Emissions Rate (TPY)	Subject To PSD?
SO_2	0	40	No
VOC	0.37	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.

3. APPLICATION REVIEW

Discussion of Emissions

The previously permitted maximum annual crude throughput rate for facility will remain unchanged at 200,750 bbl per year. The new 5,000 bbl crude oil storage tank has the potential to emit volatile organic compounds (VOC) of 18.45 TPY uncontrolled emissions. The VOCs from the new storage tank will be vented to the existing flare for oxidation. The flare has approximately 98% control efficiency. The resulting potential VOC emissions after the flare are proposed to be 0.37 TPY. This is an increase in VOC emissions for emission unit no. 002 (crude oil storage tanks). There are no specific state rule applicability that applies to the storage tanks. EU002 potential emissions are greater than 5 tons per year. Facility potential VOC emissions are greater than 54 TPY. Only recordkeeping is required for EU002.

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. Susan Machinski 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 Florida Department of Environmental Protection South District's office located at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33902-2549