TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Quantum Resources Management, LLC
5 Houston Center, 1401 McKinney Street, Suite 2700
Houston, Texas 77010

St. Regis Gas Treatment Facility and Jay Gas Plant
Facility ID No. 1130005

PROJECT

Project No. 1130005-020-AC
Application for Title V Source Air Construction Permit
Natural Gas Liquids Fractionation Unit No. 2

COUNTY

Santa Rosa County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Waste Management/Air Resources Program
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

October 30, 2014

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

Quantum Resources Management, LLC is an existing oil and gas production and natural gas processing facility, which is categorized under Standard Industrial Classification Codes No. 1311, Crude Petroleum and Natural Gas, and 1321, Natural Gas Liquids. The facility is located in Santa Rosa County at 5415 Oil Plant Road in Jay, Florida. The UTM coordinates of the existing facility are Zone 17, 482.8 km East and 3425.6 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).

Natural gas coming directly from a well contains many natural gas liquids, including ethane, propane, butane, iso-butane, and natural gasoline. There are two basic steps to the treatment of natural gas liquids in natural gas. First, the liquids must be extracted from the natural gas. Second, these natural gas liquids must be separated (fractionated) down to their base components.

The Jay Facility has had the capability to fractionate natural gas liquids to produce propane, butane and natural gasoline since the early to mid 1970's when it was owned and operated by Exxon. During that time the facility was designed to handle much greater throughputs than what the field is now capable of producing. Due to the large energy requirements to operate the oversized fractionation unit, Quantum (the current owner) made the decision to discontinue fractionation of the natural gas liquids until the process equipment could be resized. In the interim, Quantum produced a Y-Grade liquefied gas that could be transported to other facilities for fractionation.

Air construction permit No. 1130005-015-AC was issued on April 19, 2013 to authorize Quantum to resume fractionation of the natural gas liquids using a new appropriately sized skid-mounted fractionation unit. The first skid-mounted natural gas liquids fractionation unit (EU 052) began operation on September 1, 2013.

Facility Regulatory Categories

- The facility is 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 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description
This project is for the construction of a second skid-mounted natural gas liquids fractionation unit, which will enable Quantum to increase the capacity to produce propane, butane and natural gasoline. The project will affect emission units EU 052, EU 042 and EU 047 as explained below.

Skid-Mounted Natural Gas Liquids Fractionation Unit No. 2 - (added to EU 052). The Project proposes to install a second skid mounted fractionation unit, consisting of the following vessels and equipment:

1. Depropanizer and Debutanizer
2. Accumulators (Propane and Butane)
3. Condensers (Propane and Butane)
4. Reboilers (Propane and Butane)
5. Pumps (Propane and Butane)
6. R-G Cooler

The equipment is hard piped with standard type fittings (flanges) and valves. Additional equipment, proposed for the project but not included on the skid-mounted fractionation unit, will be a molecular sieve bed, two 90,000 gallon pressurized gas vessels (for propane and butane), and an electrically driven 2,000 hp propane refrigeration compressor. The molecular sieve bed will aid in the purification of the gas going to the fractionation unit.

The vessels and equipment are not vented to the atmosphere; thus, there are no emissions other than fugitive emissions from the piping components. A general process flow diagram for the Jay facility showing how the proposed equipment fits into the current operation is illustrated in Application Figure 2-3. The molecular sieve bed is labeled in the process flow diagram as a sulfur trap. A process flow diagram showing the individual pieces of equipment that will be included on the skid-mounted fractionation unit is provided in Application Figure 2-4.

A typical gas plant process flow diagram showing the relative location of the natural gas liquids fractionation unit (EU 052) is presented in Figure 1 below.

Figure 1. Typical Gas Plant Process Flow Diagram

Existing EU 052

Hot Oil Heater (EU 042). The existing Jay Plant Hot Oil Heater will provide heat for both the existing skid mounted fractionation unit and the proposed second skid-mounted fractionation unit. The Hot Oil Heater has been evaluated from the perspective of emissions changes that will occur due to the proposed installation of the second fractionation unit. The evaluation considered both the change in criteria pollutants and hazardous air pollutants. The Hot Oil Heater has also been evaluated for the change in greenhouse gases pollutants in the form of carbon dioxide equivalents, in accordance with the greenhouse gases tailoring rule. Because the regulations addressing greenhouse gases were promulgated after the Hot Oil Heater was shutdown, the emissions calculations have been based on the worst-case approach, which assumes the Hot Oil Heater to be a new source of emissions, although this is not the case. The Jay facility will report greenhouse gases emissions for both the existing fractionation unit and the proposed second fractionation unit on an annual basis in accordance with 40 CFR 98 Subpart NN, Suppliers of Natural Gas and Natural Gas Liquids.

Processed Crude Oil Storage Tanks (EU 047). The production of natural gasoline is expected to increase to approximately 580 barrels per day (211,700 barrels per year based on 365 days per year operation) as a result of the addition of the second fractionation unit. The natural gasoline will be routed to the existing processed crude oil storage tanks. With this increase in production capacity, it is anticipated that the throughput to the crude oil storage tanks will increase approximately 12.5 percent above current production levels. This increase in throughput constitutes a change in the method of operation for the crude oil storage tanks. The crude oil storage tanks have been evaluated from the perspective of emissions changes that will occur due to the proposed installation of the second fractionation unit. These emissions evaluations have considered both the change in criteria pollutants and hazardous air pollutants.

Pressurized Gas Vessels. Two new 90,000 gallon pressurized gas vessels will be installed by this project to accommodate the increase in the production of propane and butane. These pressurized gas vessels are not considered a source of air pollution.

Processing Schedule

October 7, 2014 Received the application for a Title V 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

When evaluating the Project emissions changes, Quantum took the approach of evaluating the combined emissions from both the existing fractionation unit and the proposed second fractionation unit as a single 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	Facility-Wide Potential Emissions	Project* Baseline Actual Emissions (BAE)	Project* Projected Actual Emissions (PAE)	Project* Emissions Increase	Significant Emissions Rate	Subject to PSD
CO	288.1	20.2	20.3	0.1	100	No
NO_X	813.7	24.1	24.1	0	40	No
PM	32.1	1.83	1.83	0	25	No
SO_2	3229.6	15.7	0.14	-15.6	40	No
VOC	276.5	82.7	113.1	30.4	40	No
CO_2e				28,943	75,000	No

* Project affects emission units EU 052, EU 042 and EU 047

The facility is considered a major stationary source with respect to PSD, because it has the potential to emit 250 tons per year or more of one or more regulated air pollutant. However, as shown in the table above, this project is not a major modification under PSD regulations, since the differences between the baseline actual emissions and projected actual emissions do not reach or exceed the significant emissions rates. Emissions increases are not above PSD significance thresholds for any pollutant; therefore, PSD review is not required.

Detailed Discussion of Emissions Changes by Source

Emissions changes associated with the proposed fractionation project have been evaluated on a source by source basis to determine if the PSD significance level has been exceeded. The total emissions changes and how they compare to the PSD significance level are summarized in Table 3-5 below.

Table 3-5. Summary of Emissions Changes by Source (TPY)

Pollutant	Fugitive Emissions from Equipment Leaks	Hot Oil Heater	Processed Crude Oil Storage Tanks	Total Emissions Change	PSD Significance Level	PSD Applicability (Yes/No)
NO_X	-	0	-	0	40	No
CO	-	0.1	-	0.1	100	No
PM	-	0	-	0	15	No
SO_2	-	-15.6	-	-15.6	40	No
VOC	10.5	0.01	19.9	30.4	40	No

Change to EU 052 – Skid-Mounted Natural Gas Liquids Fractionation Units

The second skid-mounted natural gas liquids fractionation unit (Unit No. 2) will be added to EU 052. Emissions from the proposed second skid-mounted fractionation unit and ancillary equipment will be limited to fugitive VOC emissions from piping components (valves, flanges, pressure relief valves, and pumps). A component count for both the existing and proposed fractionation units is provided in Table 3-1 below.

Table 3-1 Summary of Equipment Counts and Corresponding VOC Emissions

Equipment	Number of Components		Emission Factor	Fraction VOC by weight	Emissions (TPY)
	Existing Unit	Proposed Unit			
Flanges	164	220	0.00039	1.0	1.44
Valves	90	110	0.0045	1.0	8.69
Pressure Relief Valves	2	0	0.0088	1.0	0.17
Pumps	4	4	0.0024	1.0	0.19
Total:	**270**	**334**			**10.5**

Note: Included in the component count are 24 flanges for the two new pressurized gas vessels. Ancillary equipment associated with the proposed project will have a total of 6 pressure safety valves (PSV). However, the outlet gas streams from these PSV valves will be directed to a flare so they are not included as sources of air emissions.

The proposed second fractionation unit will be subject to 40 CFR 60 Subpart OOOO, as is the existing fractionation unit, and will be required to comply with the leak detection and repair (LDAR) procedures specified by 40 CFR 60 Subpart VVa.

Change to EU 042 – Jay Plant Hot Oil Heater

The existing Jay Plant Hot Oil Heater will be affected by this project; however, it will not be subject to any new requirements and will not undergo any physical changes as a result of the proposed fractionation project.

Prior to the operation of the existing skid mounted fractionation unit, the Hot Oil Heater had not been operated since before to 2008. When the air construction permit application for the first skid-mounted fractionation unit was prepared, the procedure used to determine emissions increases was to compare the actual emissions before the Hot Oil Heater was shutdown to what was expected to be the future actual emissions once the Hot Oil Heater began operation to supply heat to the skid-mounted fractionation unit. This analysis was required because the Jay facility is subject to the Prevention of Significant Deterioration regulations, and because the proposed project was a modification to a major PSD facility.

Based on past operating history, it is anticipated that to supply both the existing and proposed fractionation units, the Hot Oil Heater will need to operate continuously at its maximum capacity. This would be equivalent to its potential to emit. For evaluating the baseline actual emissions from the Hot Oil Heater for the proposed second fractionation unit project, the same two consecutive years that were used to determine baseline actual

emissions for the first fractionation project have been chosen (i.e., the period 2004/2005). Data for those years indicates that the total fuel usage for the Hot Oil Heater was 453.9 million cubic feet (MMcf) per year. The average 2004/2005 emissions for the Hot Oil Heater is provided in Table 3-2 below. With one exception, the emissions shown in Table 3-2 are based on emission factors from AP-42, for external combustion of natural gas in the small boiler category, and the heating value of the fuel that was provided in the 2004 and 2005 annual operating reports. These factors were used because when the Hot Oil Heater was operated in 2004/2005, it combusted process gas as a fuel and not pipeline quality natural gas, which is what the facility now uses for firing all gas-fired equipment. Because process gas was used as a fuel in 2004 and 2005, the sulfur content of the fuel was greater than that found in pipeline quality natural gas. Thus, the 2004 and 2005 sulfur dioxide emissions have been taken directly from the annual operating reports for those years.

Table 3-2. Summary of 2004/2005 Baseline Air Emissions for Hot Oil Heater

	Pollutant (TPY)				
	NO_X	CO	PM	SO_2	VOC
AP-42 Emission Factor (1.0 lb/MMcf)	100	84	7.6	-	5.5
Emissions (TPY)	24.1	20.2	1.83	15.7	1.32

Using the two-year average emissions from the table above for the Hot Oil Heater, the future actual emissions can be computed (assumed to be equivalent to the potential to emit) to determine if the difference in the actual emissions (past compared to future) exceeds the PSD significance level. For the future actual emissions, the Hot Oil Heater is assumed to be operating at its design heat input rate of 55.62 MMBtu/hr for 8,760 hours per year, firing pipeline quality natural gas. To calculate the future natural gas usage (purchased pipeline quality natural gas), a heating value of 1,029 Btu per scf has been used. This heating value represents the average heating value for fuel purchased by the Jay facility over a recent three month period. A comparison of past actual to future actual emissions for the Hot Oil Heater is shown in Table 3-3 below.

Table 3-3. Comparison of Baseline Actual to Future Actual Emissions from the Hot Oil Heater

Pollutant (TPY)	Baseline Actual Emissions	Future Actual Emissions	Emissions Change
NO_X	24.1	24.1	0.0
CO	20.2	20.3	0.1
PM	1.83	1.83	0.0
SO_2	15.7	0.14	-15.6
VOC	1.32	1.33	0.01

As can be seen in Table 3-3, operation of the Hot Oil Heater using pipeline quality natural gas will result in a decrease in SO_2 emissions when compared to previous operating years. This is because the pipeline quality natural gas, which would be combusted as the future fuel, has a lower sulfur content than the process gas which had been combusted historically.

Change to EU 047 – Processed Crude Oil Storage Tanks

The existing processed crude oil storage tanks will be affected by the proposed project; however, the tanks will not be subject to any new requirements and will not undergo any physical changes as a result of the proposed project.

Natural gasoline, which has approximately the same volatility as Quantum's crude oil, will be sent to the crude oil storage tanks as a result of the proposed fractionation project. This constitutes a change in the method of operation, so a review of emissions changes has been conducted in accordance with PSD review procedures. Quantum has chosen the 2004/2005 consecutive two-year period as the basis for baseline actual emissions prior to the Project. During this two-year period the average actual production of crude oil was 48,497,022 gallons.

This production level has been used to calculate the actual emissions that would result from storage of the crude oil, using the US EPA TANKS program. Upon completing these runs at a production rate of 48,497,022 gallons for the two-year averaging period, it was determined that VOC emissions would be 40.7 tons per year for each tank (total of 81.4 tons for two tanks combined).

To determine future actual emissions, and to comply with PSD regulations, it was necessary for Quantum to project the future production of natural gasoline that would be produced by the proposed fractionation project by observing levels of crude oil production since taking over operations of the facility from ExxonMobil in April 2007. Quantum has been gradually increasing the production of crude oil at the Jay facility and anticipates this trend to continue in the future. During the month of August 2013, prior to operation of the existing fractionation unit (i.e., no addition of C5+), oil production at the Jay facility was 150,248 barrels. If Quantum were to produce this quantity on a monthly basis going forward in time, the annual oil production would be approximately 1.8 million barrels. Added to this would be the production of natural gasoline coming from the existing and proposed fractionation units. Quantum indicated that the maximum daily production of natural gasoline from the existing fractionation unit is approximately 870 barrels per day (317,550 barrels per year). Added to this will be the C5+ production from the proposed second fractionation unit, which is anticipated to be approximately 580 barrels per day (211,770 barrels per year). The combined estimate of future crude oil production, based on the August 2013 production rate, which takes into account a production increase of 30 percent and includes the anticipated maximum C5+ production rate from both fractionation units, would be approximately 2.9 million barrels per year (122 million gallons per year). Using this production level and the TANKS program, it was determined that the future actual VOC emissions would be 50.65 tons per year for each tank (total of 101.3 tons per year for the two crude oil storage tanks combined).

A summary of VOC emissions from Processed Crude Oil Storage Tanks is provided in Table 3-4 below.

Table 3-4. Evaluation of VOC Emissions Increase (TPY) for Processed Crude Oil Storage

Activity	Baseline Actual Emissions (2004/2005)	Future Actual Emissions	Emissions Change
Crude Oil Storage	81.4	101.3	19.9

3. APPLICATION REVIEW

Application Fee

Title V Facility - no application fee required.

Discussion of Emissions

There are three emissions sources that will be affected by the proposed fractionation project. These are the natural gas liquids fractionation units (EU 052), the existing Hot Oil Heater (EU 042) and the two existing Processed Crude Oil Storage Tanks (EU 047). The proposed skid-mounted fractionation unit will control emissions through a leak detection and repair (LDAR) program. The Hot Oil Heater does not have any control equipment; however, it will be fired with pipeline quality natural gas, in lieu of process gas, which will result in a decrease of sulfur dioxide emissions. The nitrogen blanketed, fixed roof processed crude oil storage tanks do not have any emissions control equipment.

Hazardous Air Pollutants

The proposed fractionation project will result in an increase in hazardous air pollutants (HAP). The increase in HAP would be primarily attributed to the increase in the production of natural gasoline. Production of natural gasoline from the proposed second fractionation unit is expected to be approximately 580 barrels per day. This increase in natural gasoline production is estimated to increase VOC emissions by approximately 5.7 tons per year. Based on an evaluation of other facilities that produce natural gasoline as part of the fractionation process, it is estimated that the HAP content of the natural gasoline in the form of benzene, ethyl benzene, toluene and xylenes (BTEX) would be approximately 20 percent of the total VOC, with xylenes making up approximately 60 percent of that total. The Project would increase total HAP by approximately 1.88 tons per year, with xylenes being the major contributor at 1.13 tons per year.

Greenhouse Gases

The change in greenhouse gases, in carbon dioxide equivalents (CO2e), was evaluated as part of PSD review in accordance with the greenhouse gases tailoring rule. For this review, the PSD significance level is established at 75,000 tons per year for modifications to major sources. Because this rule had not been promulgated at the time the Hot Oil Heater was operating prior to being shutdown in December 2008, this evaluation has been conducted using a worst-case analysis, which treats the Hot Oil Heater as an entirely new source of emissions. Based on this assumption, and using the emissions factor of 120,000 lb/MMscf for CO_2 and 2.3 lb/MMscf for methane from AP-42 Table 1.4-2, the increase in CO2e has been calculated to be 28,943 tons per year. This emissions rate is below the PSD significant level of 75,000 tons per year; thus, PSD review is not triggered for CO2e.

Potential to Emit

Facility-wide potential to emit (from Title V permit No. 1130005-016-AV, effective July 1 2014).

Emissions Unit	SO_2	NO_X	VOC	CO	PM	HAPS	H_2S
J2, J3 Sulfur Recovery	2490	19.4		16.3		0.35	
Flares	730	26.8	1.47	22.5	2.0	0.20	
Process Heaters	0.43	72.3	4.01	60.7	5.51	0.87	
3600 HP Solar Turbine	0.64	60.2	0.40	15.4	1.2	0.13	
14,300 HP Waterflood Gas Turbine	2.3	171	1.4	15	4.5	0.50	
Engines	0.33	464	40.2	158.2	18.9	19.77	
Sulfur Pits	5.94						12.3
Processed Crude Oil Storage Tanks			97.4				
Glycol Reboiler Vent			2.2			0.55	
Fugitive Emissions			128.3				
Fractionation Unit (existing)			1.07				
TOTAL	3229.64	813.7	276.5	288.1	32.1	22.4	12.3

Emissions Units Affected by this Project

This project affects three emissions units as follows:

a. EU 052: Skid-Mounted Natural Gas Liquids Fractionation Units. The table below shows emissions due to equipment leaks from both the existing and proposed Fractionation Units combined.

Equipment	**Number of Components**		**Emission Factor**	**Fraction VOC (by weight)**	**Emissions (TPY)**
	Existing Fractionation Unit	**Proposed Fractionation Unit**			
Flanges	164	220	0.00039	1.0	1.44
Valves	90	110	0.0045	1.0	8.69
Pressure Relief Valves	2	0	0.0088	1.0	0.17
Pumps	4	4	0.0024	1.0	0.19
Total:	**270**	**334**			**10.5**

b. EU 047: Jay Plant Hot Oil Heater

Pollutant	Baseline Actual (2004/2005) Emissions - firing process gas (tpy)	Projected Actual Emissions- firing pipeline quality natural gas (tpy)	Actual Emissions Increase (tpy)
CO	20.2	20.3	0.1
NO_X	24.1	24.1	0
PM	1.83	1.83	0
SO_2	15.7	0.14	-15.56
VOC	1.32	1.33	0.01
CO_2e			28,943

c. EU 047: Processed Crude Oil Storage Tanks

Pollutant	Baseline Actual (2004/2005) Emissions (tpy)	Projected Actual Emissions (tpy)	Actual Emissions Increase (tpy)
VOC	81.4	101.3	19.9

State Requirements

N/A

Federal NSPS Provisions

40 CFR 60 Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution.

40 CFR 60 Subpart VVa - Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006.

Federal NESHAP Provisions

N/A

Other Draft Permit Requirements

N/A

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. Howard Ard 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 850.595.0622 or howard.ard@dep.state.fl.us.