

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

PERSONAL
FILE COPY

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

June 3, 1986

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. R. J. Koerner
Production Manager
Exxon Company, U.S.A., Eastern Division
Post Office Box 61707
New Orleans, Louisiana 70161-1707

Dear Mr. Koerner:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed permit to modify your existing Raccoon Point oil production facility in Collier County, Florida.

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Mr. Bill Thomas of the Bureau of Air Quality Management.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Attachments

cc: John P. Higgins, P.E.
W. L. Palmer
David Knowles

State of Florida
Department of Environmental Regulation
Notice of Intent

The Department gives notice of its intent to issue a permit to Exxon Company, U.S.A. for the modification of the existing Raccoon Point oil production facility to allow extraction, separation, and storage of a maximum of 7,500 BOPD of product. This will be accomplished by adding heater-treaters, attendant equipment, and 13 additional wells. This facility is located at Exxon Company's Raccoon Point oil field which is approximately 60 miles ESE of Naples, Florida off of US 41, in Collier County. A determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative determination (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a petition within this time period constitutes a waiver of any right such person has to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the proposed agency action. Therefore, persons who may not wish to file a petition may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Rule 28-5.207, Florida Administrative Code, at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Dept. of Environmental Regulation
South Florida District
2269 Bay Street
Ft. Myers, Florida 33901

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Exxon Company, U.S.A.
Post Office Box 61707
New Orleans, LA 70161-1707

DER File No. AC 11-112869

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Exxon Company, U.S.A., applied on December 20, 1985, to the Department of Environmental Regulation for a permit to modify the existing Raccoon Point oil production facility to allow extraction, separation, and storage of a maximum of 7,500 BOPD of product. The proposed construction will be located at the applicant's existing oil field which is located approximately 60 miles ESE of Naples, Collier County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit was needed for the proposed work.

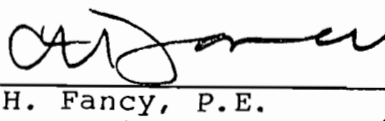
Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, FAC, you (the applicant) are required to publish at your own expense the enclosed Notice of Proposed Agency Action on permit application. The notice must be published one time only in a section of a major local newspaper of general circulation in the county in which the project is located and within thirty (30) days from receipt of this intent. Proof of publication must be provided to the Department within seven days of publication of

the notice. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S. A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. Petitions must comply with the requirement of Florida Administrative Code Rules 17-103.155 and 28-5.201 (copies enclosed) and be filed with (received by) the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32301-8241. Petitions filed by the permit applicant must be filed within fourteen (14) days of receipt of this intent. Petitions filed by other persons must be filed within fourteen (14) days of publication of the public notice or within fourteen (14) days of receipt of this intent, whichever first occurs. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes, concerning the subject permit application. Petitions which are not filed in accordance with the above provisions will be dismissed.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

Copies furnished to:

R. J. Koerner, Exxon Company
John P. Higgins, P.E., Exxon Company
W. L. Palmer, Exxon Company
David Knowles, DER South Florida District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on June 3, 1984.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Patricia G. Adams June 3, 1984
Clerk Date

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103

of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to an administrative determination (hearing) under Section 120.57, F.S.

(4) Notice to substantially affected persons concerning applications for Department permits is an essential and integral part of the state environmental licensing process. Therefore, no application for a permit for which publication of notice is required shall be granted until and unless proof of publication of Notice is furnished to the appropriate Department permitting office.

(5)(a) Any applicant or person benefiting from the Department's action may elect to publish notice of proposed agency action in the manner provided by subsection (2) or (3). Any person who elects to publish notice of proposed agency action, upon presentation of proof of publication to the Department, prior to final agency action, shall be entitled to the same benefits under this rule as a person who is required to publish notice of proposed agency action. Since persons whose substantial interests are affected by a Department decision on a permit application may petition for an administrative proceeding within fourteen (14) days after receipt of notice and since, unless notice is given or published as prescribed in this rule, receipt of notice can occur at any time, the applicant or persons benefiting from the Department's action cannot justifiably rely on the finality of

the Department's decision without the notice having been duly given or published.

(b) The notices required by this rule may be combined with other notices required by the Department pursuant to Chapter 403, 376, or 253, F.S., or Chapter 17, FAC.

(c) The provisions of this section shall also apply to the permitting of hazardous waste facilities, but only to the extent it is consistent with Chapter 17-30, Part IV, FAC. Whenever Chapter 17-30, Part IV, FAC, provides for a different time or notice procedure than that set forth in this section the time and notice provisions of Chapter 17-30 shall govern.

(6) Failure to publish any notice of application, notice of proposed agency action, or notice of agency action required by the Department shall be an independent basis for the denial of a permit.
Specific Authority: 120.53, 403.0876, 403.815, F.S. Law Implemented: 120.53, F.S.
History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

17-103.155 Petition for Administrative Hearing; Waiver of Right to Administrative Proceeding.

(1)(a) Any person whose substantial interests may be affected by proposed or final agency action may file a petition for administrative proceeding. A petition shall be in the form required by this Chapter and Chapter 28-5, FAC, and shall be filed (received) in the Office of General Counsel of the Department within fourteen (14) days of receipt of notice of proposed agency action or within fourteen (14) days of receipt of notice of

17-103.150(3)(d) -- 17-103.155(1)(a)

DER1985 RULES OF ADMINISTRATIVE PROCEDURE - NON-RULEMAKING 17-103

agency action whenever there is no public notice of proposed agency action. In addition to the requirements of Rule 28-5.201, FAC, the Petition must specify the county in which the project is or will be located.

(b) Failure to file a petition within fourteen (14) days of receipt of notice of agency action or fourteen (14) days of receipt of notice of proposed agency action, whichever notice first occurs, shall constitute a waiver of any right to request an administrative proceeding under Chapter 120, F.S.

(c) When there has been no publication of notice of agency action or notice of proposed agency action as prescribed in Rule 17-103.150, FAC, a person who has actual knowledge of the agency action or has knowledge which would lead a reasonable person to conclude that the Department has taken final agency action, has a duty to make further inquiry within fourteen (14) days of obtaining such knowledge by contacting the Department to ascertain whether action has occurred. The Department shall upon receipt of such an inquiry, if agency action has occurred, promptly provide the person with notice as prescribed by Rule 17-103.150, FAC. Failure of the person to make inquiry with the Department within fourteen (14) days after obtaining such knowledge may estop the person from obtaining an administrative proceeding on the agency action.

(2)(a) "Receipt of notice of agency action" means receipt of written notice of final agency action, as prescribed by Department rule, or the publication, pursuant to Department rule, of notice of final agency action, whichever first

occurs.

(b) "Receipt of notice of proposed agency action" means receipt of written notice (such as a letter of intent) that the Department proposes to take certain action, or the publication pursuant to Department rule of notice of proposed agency action, whichever first occurs.

(3) Notwithstanding any other provision in this Chapter, should a substantially affected person who fails to timely request a hearing under Section 120.57, F.S., administratively appeal the final Department action or order, the record on appeal should be limited to:

(a) the application, and accompanying documentation submitted by the applicant prior to the issuance of the agency's intent to issue or deny the requested permit.

(b) the materials and information relied upon by the agency in determining the final agency action or order;

(c) any notices issued or published; and

(d) the final agency action or order entered concerning the permit application.

(4) In such cases where persons do not timely exercise their rights accorded by Section 120.57(1), Florida Statutes, the allegations of fact contained in or incorporated by the final agency action shall be deemed uncontested and true, and appellants may not dispute the truth of such allegations upon subsequent appeal.

(5) Any applicant may challenge the Department's request for additional information by filing with the Office of General Counsel an appropriate petition for administrative proceeding pursuant to Section 120.60, F.S., following receipt by

the applicant of the Department's notification, pursuant to Section 403.0876, F.S., that additional information is required.

Specific Authority: 120.53, 403.0876, 403.815, F.S. Law

Implemented: 120.53, F.S.

History: New 9-20-79, Amended 4-28-81, Transferred from 17-1.62 and Amended 6-1-84.

17-103.160 Uniformity in Approval and Denial of Applications for Department Permits and Certifications.

To the extent possible and consistent with the public interest, the Department approves and denies applications for permits and certifications on a uniform and consistent basis. Final Department actions on applications for permits and certifications shall be consistent with prior Department actions, unless deviation therefrom is explained by the Department in writing or the hearing officer who submits a recommended order to the Department for final agency action in accordance with Section 120.57, Florida Statutes.

Specific Authority: 120.53(1), F.S. Law Implemented: 120.53(1), 120.68(12), F.S. History: New 2-6-78, Transferred from 17-1.63, 6-1-84.

17-103.170 Designation, Preparation and Transmittal of Record for Administrative Appeals.

When any Department action or order is the subject of an administrative appeal under Chapter 17-103, Part II, FAC, the following requirements shall apply:

(1) Designation of Record. Within fifteen (15) days of rendition of the Department's final order, the appellant shall designate

to the Department, in writing, with copies to other parties, those documents or things under the control of or in the possession of the Department which the appellant desires to have included in the record, and which were received or considered in the Department proceeding below. If a proceeding was reported by mechanical recording devices, the appellant shall designate those portions of the proceeding for which it requires written transcription or tapes for transcription. Any other party may designate other portions of the record in the manner provided herein. Such cross-designation shall be filed with the Department, with copies provided other parties, within seven (7) days after receipt of the designation by the appellant.

(2) Original Record. The Department shall thereupon include in the record all of the designated portions of the original papers and exhibits in the proceedings or matter from which administrative appeal is taken, together with a copy of any such parts of the proceedings as were stenographically reported or transcribed from tapes, and as have been designated by the parties and certified by a notary public, the reporter, or other officer for inclusion in the record on appeal or review, and certified copies of the order, if any, of which review is sought. The Department may, at its discretion, substitute certified copies for original papers or documents in its possession.

(3) Preparation of Record. Upon tender or deposit by appellant of the estimated cost of preparation, the Department shall prepare the record in accordance with the designations of the parties. The cost of preparation, and reproduction,

Technical Evaluation
and
Preliminary Determination

Exxon Company, USA
Raccoon Point Field
Collier County, Florida

New Construction & Modifications to
Raccoon Point Oil Field Production Facilities
Permit No. AC 11-112869

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

June 3, 1986

I. Application

A. Name and Address of Applicant

Exxon Company, U.S.A.; Eastern Division
Post Office Box 61707
New Orleans, Louisiana 70161-1707

B. Source Location

The projected well will be located at the applicant's existing facility, which is north of U.S. 41 and approximately 60 miles ESE of Naples, in Collier County, Florida. UTM coordinates are Zone 17, 509.6 km East and 2873.2 km North. Facility codes include: Standard Industrial Code (SIC) 1311 (crude oil production and processing); Source Classification Codes 3-10-001-01 (well completion), 3-10-001-03 (oil pumping-rod pump), and 3-10-001-99 (misc. crude oil treatment).

II. Project

A. Project Overview

The applicant proposes to drill an additional 13 oil wells, which will bring the total number of wells comprising this field to 25. Maximum field production, on the basis of the data in the application, is forecast at 5000 barrels of oil per day (BOPD). The maximum projected output of this field is 7,500 BOPD.

Installation of the following equipment will be concomitant to drilling: 13 oil well pumps, 13 heater-treaters, 1 test heater-treater, 1 oil pipeline pump, 1 saltwater (SW) discharge pump, and 1 test electric generator. A retro-fitted vapor recovery system for the existing storage tank battery is included in this project.

B. Process Description

At each of the completed wells is a 100 hp Waukesha natural (or fuel) gas fired pumping engine. These engines lift the oil via a rod pump. Leakage traps are maintained at the above ground orifice to prevent escape of VOC's.

This heavy crude flows from the well site via above ground piping to the main tank battery area. In some cases a well's product may be separated into crude, water, and gas by a knock-out vessel. A knock-out vessel relies on gravity separation and has no associated emissions.

The facility at Raccoon Point produces and stores crude oil for sale. The facility consists of oil wells, heater-treaters

(1 per well), a test heater-treater, knock-out vessels, storage tanks, vapor recovery unit, a flare, circulating pumps, electric generators, salt water discharge well pumps, and pumps to transport the product of this field to remote storage.

Heater-treaters heat the crude in order to facilitate separation of oil and water. Each is rated at one-half million Btu per hour. They are fired using the natural gas evolved from the crude.

Storage tanks containing the heavy crude employ a Hy-Bon skid mounted, single-stage, stock tank vapor recovery unit Model HB-50A and John Zinc Smokeless Flare, Model LRGO, to control VOC emissions. VOC in the vapor state evolves from the stored crude. The vapors are vented to a compressor unit which liquifies and returns the VOC to the stored product. This vapor recovery unit is included in the scope of the current modifications, and in conjunction with the flare, provides a very significant decrease in VOC emissions over the previously permitted venting to the atmosphere.

Salt water, which is separated by either knock-out vessels and/or heater-treater units, is stored in a tank before being injected underground.

All pumps, heater-treaters, and electrical generators are natural-gas fired. This is the same gas that was separated from the crude.

C. Process Controls

Emissions from the combustion of fuel gas in the pumps, heater-treaters, and generators are emitted without being treated with add-on controls. Storage tank evolved VOC's are controlled by the vapor recovery unit that is assumed to have an 80% duty factor. Surplus (or natural) fuel gas is flared.

III. Rule Applicability

The proposed project is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes (FS), and Rule 17-2, Florida Administrative Code (FAC).

Exxon's Raccoon Point production facility is located in Collier County. Collier County is currently designated as an attainment area for all criteria pollutants (17-2.420, FAC).

The application for construction/modification of air pollution sources (AC 11-112839) was received by the department on December 6, 1985. Completeness was met for this application on March 24, 1986. The original application and subsequent

permit AC 11-62020 for this minor facility were used to validate this determination and become part of this determination. Copies on this determination are on file at the department's offices in Tallahassee and Ft. Myers.

The facility, as proposed, is not subject to New Source Review under Prevention of Significant Deterioration (PSD) guidelines (17-2.500(2)(d)3, FAC) as it is a minor source and its increases in pollution are less than 250 tons per year (for any one criteria pollutant). It is located more than 10 km from a Class I Area (Everglades National Park) (17-2.500(2)(d)4, FAC).

The subject facility and proposed modifications shall be permitted under Section 17-2.520, "Sources Not Subject to PSD or Nonattainment Requirements".

IV. Air Quality Analysis

No ambient air monitoring or modeling by the applicant was required. The department has reasonable assurance that ambient air quality standards will be maintained.

V. Evaluation

This proposal continues to use the existing storage tanks (with vapor recovery system), and flare for surplus natural gas not used by operation of the various engines and heater-treaters of the facility.

Detailed review of the data supplied with the application necessitated adjustment of some emission calculations from those originally submitted. Calculations are based on the information supplied by the applicant as found complete March 24, 1986. Table 2 summarizes the proposed emissions. Note that the emissions from the stock tanks and flare listed in Table 2 are for modified production input and that the structure itself (& equipment) is unmodified from existing.

During 1985 the facility emissions were reduced. Table I shows current permitted emissions. Loading of oil in trucks was discontinued in favor of piping to a remote site for processing. Emissions from the stock tanks were controlled by the addition of a vapor recovery system.

The applicant states the expected operational factor of the vapor recovery system is 80%. Emissions from the storage tanks can be expected to be 63.24 TPY VOC. Thus, the allowable VOC emissions are reduced by:

Truck Loading	20.52 TPY VOC
Stock Storage Tanks	94.86 TPY VOC
<u>Total</u>	<u>115.38 TPY VOC</u>

Calculations are based on the information supplied by the applicant as found complete March 24, 1986. Table 2 summarizes the proposed emissions. Note that the emissions from the stock tanks and flare listed in Table 2 are for modified production input and that the structure itself (and equipment) is unmodified from existing.

VI. Conclusion

Based on a review of the information provided by Exxon Company, U.S.A., for modification of their Raccoon Point production facility, the Florida Department of Environmental Regulation concludes that compliance with all applicable state air regulations will be achieved provided certain specific conditions are met.

These specific conditions along with general conditions are contained in the proposed permit which is attached.

BEST AVAILABLE COPY

Table 1
Allowable Emissions for Original Facility (AO 11-62020)

Unit	No.	VOC		NOx		CO		SO ₂		PM	
		lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY
Heater-Treater	12	0.0008	0.039	0.04	2.23	0.01	0.27	0.00018	0.009	0.0023	0.13
Pumping Unit	12	0.5890	30.935	2.397	126.0	0.3105	16.32	0.00175	0.021	--	--
Oil Loading Pump	2	0.1358	1.19	0.5502	4.83	0.0707	0.62	--	--	--	--
Saltwater Disposal Pump	2	0.1358	1.19	0.5502	4.83	0.0707	0.62	--	--	--	--
Circulating Pump	4	0.0348	0.61	0.1438	2.52	0.0182	0.32	--	--	--	--
Oil Pipeline Pump	1	0.5883	2.58	2.397	10.50	0.3105	1.36	--	--	--	--
Electric Generator	1	0.2100	0.92	0.8630	3.76	0.1095	0.48	--	--	--	--
Storage Tanks (6,000 Bbl)	-	36.0959	158.1	--	--	--	--	--	--	--	--
Oil Truck Loading	-	4.7	20.52	--	--	--	--	--	--	--	--
Flare	1	0	0	0	0	0	0	0	0	0	0
Allowable for Total Facility After 5/22/84 Revision			216.08		154.7		19.99		0.03		0.13

Table 2
Allowable Emissions for Facility after Proposed Modifications

Unit	No.	VOC		NOx		CO		SO ₂		PM	
		lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY
Heater-Treater	26	0.001	0.09	0.04	4.56	0.01	1.14	0	0	0.002	0.26
Pumping Unit	25	0.588	64.50	2.40	262.47	0.31	34.00	0	0	--	--
Oil Loading Pump	2	0.136	1.19	0.55	4.83	0.07	0.62	0	0	--	--
SWD Pump (Exist)	2	0.136	1.19	0.55	4.83	0.07	0.62	0	0	--	--
SWD Pump (New)	1	0.48	2.12	2.40	10.50	0.31	1.36	0	0	--	--
Circulating Pump	2	0.035	0.30	0.14	1.26	0.02	0.16	0	0	--	--
Electric Gen. (Exist)	1	0.21	0.92	0.86	3.76	0.11	0.48	0	0	--	--
Electric Gen. (New)	1	0.48	2.12	2.40	10.50	0.31	1.36	0	0	--	--
Oil Pipeline Pump	2	0.588	5.15	2.40	21.00	0.31	2.72	0	0	--	--
Storage Tanks (1000 Bbl)*	6	2.4	63.24	--	--	--	--	0	0	--	--
Flare**	1	--	0.73	--	17.25	--	3.92	0	0	--	--
Truck Oil Loading	0	--	--	--	--	--	--	0	0	--	--
Total			144.08		340.95		46.38		0		0.26
Previous emissions (AC 11-62020)			216.08		154.70		19.99		0.03		0.03
Change after Modification			(72.00)		186.25		27.19		(0.03)		0.23

*Average Annual Emissions (20% of 2 x 158.1 TPY)

**Estimated emissions for 5000 BOPD production

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE:
Exxon Company, U.S.A.
P. O. Box 61707
New Orleans, LA 70161-1707

Permit Number: AC 11-112869
Expiration Date: June 30, 1987
County: Collier
Latitude/Longitude: 25° 58' 45"N
80° 54' 13"W
Project: Upscale Raccoon Point Facility
to 7,500 BOPD; & construction
of associated equipment

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

Modification of the existing Raccoon Point oil production facility to allow extraction, separation, and storage of a maximum of 7,500 BOPD of product. This will be accomplished by adding heater-treaters, attendant equipment, and 13 additional wells. This facility is located at Exxon's Raccoon Point oil field which is approximately 60 miles ESE of Naples, Florida off of US 41, in Collier County. UTM coordinates of the site are Zone 17, 509.6 km East and 2873.2 km North.

Construction shall be in accordance with the attached permit application and additional materials except as otherwise noted on pages 5-7, Specific Conditions.

Attachments:

1. FDER construction permit AC 11-62020 issued April 17, 1983; revised August 13, 1984.
2. "Application to Construct Air Pollution Sources," FDER Form 17-1.122(16); received December 6, 1985.
3. C. H. Fancy's letter of January 3, 1986.
4. C. A. Martin's letter of February 4, 1986.
5. C. H. Fancy's letter of February 21, 1986.
6. C. A. Martin's letter of March 24, 1986.

PERMITTEE:
Exxon Company, U.S.A.

Permit Number: AC 11-112869
Expiration Date: June 30, 1987

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

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6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

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The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Compliance with New Source Performance Standards.

14. The permittee shall comply with the following monitoring and record keeping requirements:

- a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

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- b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Operation is continuous (8,760 hours annually).
2. Annual rate of oil production shall not exceed 2,737,500 BBL and 7,500 BBL oil per day (BOPD).
3. Annual gas throughput to flare shall not exceed 1.74348×10^8 SCF and 1.453×10^7 SCF per month.

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4. Emissions from the modified facility shall not exceed the following:

Table 2
Allowable Emissions for Facility after Proposed Modifications

Unit	No.	VOC		NOx		CO		SO ₂		PM	
		lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY	lb/hr Unit	total TPY
Heater-Treater	26	0.001	0.09	0.04	4.56	0.01	1.14	0	0	0.002	0.26
Pumping Unit	25	0.588	64.50	2.40	262.47	0.31	34.00	0	0	--	--
Oil Loading Pump	2	0.136	1.19	0.55	4.83	0.07	0.62	0	0	--	--
SWD Pump (Exist)	2	0.136	1.19	0.55	4.83	0.07	0.62	0	0	--	--
SWD Pump (New)	1	0.48	2.12	2.40	10.50	0.31	1.36	0	0	--	--
Circulating Pump	2	0.035	0.30	0.14	1.26	0.02	0.16	0	0	--	--
Electric Gen. (Exist)	1	0.21	0.92	0.86	3.76	0.11	0.48	0	0	--	--
Electric Gen. (New)	1	0.48	2.12	2.40	10.50	0.31	1.36	0	0	--	--
Oil Pipeline Pump	2	0.588	5.15	2.40	21.00	0.31	2.72	0	0	--	--
Storage Tanks (1000 Bbl)*	6	2.4	63.24	--	--	--	--	0	0	--	--
Flare**	1	--	0.73	--	17.25	--	3.92	0	0	--	--
Truck Oil Loading	0	--	--	--	--	--	--	0	0	--	--
Total			144.08		340.95		46.38		0		0.26
Previous emissions (AC 11-62020)			216.08		154.70		19.99		0.03		0.03
Change after Modification			(72.00)		186.25		27.19		(0.03)		0.23

*Average Annual Emissions (20% of 2 x 158.1 TPY)

**Estimated emissions for 5000 BOPD production

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SPECIFIC CONDITIONS:

5. Vapor recovery unit must be monitored by running time meter or operations recording such that duty factor of unit is maintained at ≥ 0.8 .
6. Compliance with emissions set forth in (4) above shall be based on $\leq 10\%$ opacity as determined by DER Method 9, and a manner consistent with good air pollution practice for minimizing emissions. If visible emissions exceed 10% opacity, EPA test methods or other methods acceptable to this department must be used to determine the compliance of the affected source.
7. Proper maintenance of all equipment subject to this permit is required.
8. Reasonable precautions to prevent fugitive particulate emissions during construction, such as coating or spraying roads and construction sites used by work parties, will be taken by the permittee.
9. The construction shall reasonably conform to the specifications and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the department in writing 60 days prior to the expiration of this construction permit and submit a new schedule and request for an extension of the construction permit (Rule 17-4.09, FAC).
10. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit, including the application fee, along with test results and Certificate of Completion, to the Department's South Florida's District office 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate. (FAC Rule 17-4.22 and 17-4.23)
11. If the construction permit expires prior to the permittee requesting an extension or obtaining a permit to operate, then all activities at the project must cease and the permittee must apply for a new permit to construct which can take up to 90 days to process a after receipt of a complete application. (FAC Rule 17-4.10)

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SPECIFIC CONDITIONS:

Issued this _____ day of _____, 19__

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

VICTORIA J. TSCHINKEL, Secretary

_____ pages attached.