From:	Kekeisen, Kyle
To:	Read, David
Cc:	Russ.Perry@bp.com; Harrington, Jeff; Linero, Alvaro; Santiago.Arcila@bp.com
Subject:	(Archived w/ Attachments) Comments to Preliminary Draft Permit
Date:	Friday, November 02, 2012 9:17:54 AM
Attachments:	BP_Draft_PERMIT-ApplicantEdits-20121029-redline.docx

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Hello David—I have attached BP's comments to the preliminary draft permit to this note. Items that differ from our comments to the draft tech memo are as follows:

- The proposed natural gas limit for the two boilers has been modified. The updated limit accounts for the larger RTO, the reduced number of engines, and a reduction in assumed fire pump and emergency engine hours from 500 to 100 with respect to the calculation of potential emissions. The latter was based on FDEP's draft permit language stating that potential emissions were calculated on the basis of 100 hours per year for these units.
- We are amenable to the CPM testing program proposed by you in the preliminary draft permit. This differs from our response in the draft tech memo which would have resulted in a potentially more complex sequence of tests.
- Our response in the attached to the HCl limits differs from our response to the draft tech memo. We prefer the limits listed in the attached preliminary draft permit.

I expect these to be the main differences, but you may find others during your review.

We recognize that we owe you application forms for the larger RTO and reduced number of emergency engines. Our Responsible Official is out of the country until next week, and we intend to submit those forms upon his return. We will also submit an updated emissions inventory reflecting the product loadout-to-flare option and the updated product loadout-to-RTO option at that time.

Please contact myself or Jeff Harrington with any questions and/or concerns. Thank you for your continued support.

Regards,

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