DEC 19 1986 4APT-AC DER
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BAOM

Mr. Charles Martin, Permits/ Surveillance Supervisor Eastern Division Exxon Company, U.S.A. Post Office Box 61707 New Orleans, Louisiana 70161-1707

Dear Mr. Martin:

This is in reference to your letter of November 13, 1986 to the Environmental Protection Agency concerning your plans to begin construction of a Flare Recovery System at your St. Regis Treating Facility in Jay, Florida.

The responsibilities for compliance with the "New Source Performance Standards (NSPS)-Equipment Leaks of VOC from Onshore Natural Gas Processing Plants" (40 CFR 60, Subpart KKK) was delegated to the state of Florida on July 2, 1986.

Once a source is constructed, EPA shares a joint responsibility with the florida DER to assure the source is in compliance with all applicable pollution abatement regulations. Although EPA shares this responsibility with the Florida DER, the Florida DER is the primary agency responsible for assuring that these regulations are met.

If you have any further questions regarding this matter, please contact Mr. Brian Beals at 404/347-2904.

Sincerely yours,

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James T. Wilburn, Chief Air Compliance Branch Air, Pesticides, and Toxics Hanagement Division

cc: Mr. Steve Smallwood, Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blairstone Road
Tallahassee, Florida 32301

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(Tues) £ take further
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EXON COMPANY, U.S.A.

POST OFFICE BOX 61707 • NEW ORLEANS, LOUISIANA 70161-1707

PRODUCTION DEPARTMENT EASTERN DIVISION

November 13, 1986

Air New Source Performance Standard Construction Notification

Environmental Protection Agency Region IV 345 Courtland Street NE Atanta, Georgia 30365

This correspondence is to advise your office concerning our plans to begin construction of a Flare Recovery System at our St. Regis Treating Facility in Jay, Florida. This improvement will involve installation-of a 900 horsepower compressor skid and ancillary equipment to capture normal plant flare gas for recycle back to the treating facility for hydrocarbon recovery. We have reviewed the applicability of this project with respect to the "New Source Performance Standard (NSPS): Equipment Leaks of VOC From Onshore Natural Gas Process Plants" (40 CFR 60 Subpart KKK). Our interpretation is the installation will be subject to NSPS; therefore, compliance procedures will be established.

This letter is intended to satisfy the 30-day notification requirement upon initiating construction. Currently, our plans call for construction to commence on November 17, 1986. Your office will further be advised in writing 30 days prior to the scheduled start-up date, tentatively 3rd Quarter 1987. Please advise us if primacy of this program is delegated to the State of Florida so our future correspondence can be properly routed. If further information is required, please contact Mr. S. G. Vinson in Jay, Florida at (904) 675-4493.

Very truly yours,

EXXON CORPORATION

Charles Martin, Permits, Surveillance Supervisor

Eastern Division

Exxon Company, U.S.A.

(a division of Exxon Corporation)

SGV/qbh

c - Mr. Jack Preece, Dept. of Environmental Regulation

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copy to cAPS - Bel Phomas "/19/86

NORTHWEST FLORIDA DER