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Rothery/P2/R8/USEPA/US
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To Julie.Drinkwater@bp.com
cc Kathleen Paser/P2/R8/USEPA/US@EPA
bcc
Subject Florida Renewal Application

Julie,

I am working with Kathleen Paser on reviewing the BP Florida River Compression Facility renewal permit in order to determine completeness. The following items need further attention before we can complete our review.

1. An EUD form for the plant flare needs to be submitted.
2. EMISS forms need to be submitted for all units.
3. Form EUD-1 for unit AH-2 describes the unit as "44.0 MMBtu/hr", form GIS, section I describes the unit as 40.0 mmBtu/hr. Please clarify which is correct.
4. In form GIS, section F, the discussion on MACT ZZZZ discusses MACT HH applicability. This should be corrected.
5. In form GIS, section F, please discuss NSPS KKK applicability.
6. Our experience with the oil and gas initiative indicates that the AP-42 emission factors for estimating formaldehyde emissions from engines are not very reliable. Since this factor is an industry average, sometimes this factor overestimate emissions and sometimes it underestimates them. In addition, the factor has an AP-42 rating of E. We have been asking all our sources to provide engine manufacturer emission factors for formaldehyde instead.
7. Based on the HAP PTE after using a more reliable emission factor for formaldehyde, it may be necessary to re-evaluate MACT applicability and resubmit the compliance certifications based on this analysis.
8. When submitting the new forms and information, please remember that a CTAC form, signed by the Responsible Official, must be included.

In order to determine the application complete, we will need to receive the above information by January 27, 2006. Let me know if you have any questions.

Thanks,

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