Deirdre
Rothery/P2/R8/USEPA/US
01/04/2006 12:13 PM

To "Best, Julie A" <Julie.Drinkwater@bp.com>
cc Kathleen Paser/P2/R8/USEPA/US@EPA
bcc
Subject RE: Florida Renewal Application

Julie,

Thank you for the responses provided. I have provided additional information as needed within your email below. Let me know if you have any additional questions.

1. Which EUD form should I use for the flare?

EUD 1 for Fuel Combustion Sources. If the form does not accommodate this type of unit, you can certainly attach additional information to the form or modify the form to meet your needs.

2. Since the lb/hr and tpy emission rates are included in the emissions calculations, we have not been required to complete EMISS forms in the past. We can certainly submit them if needed.

Potential emission calculations have been included, however, EMISS forms require both actual and potential emission estimates. Therefore, we will need you to submit the EMISS forms as part of this permit. As an alternative you may submit the clearly identified actual and potential emissions in your own format, provided all the information required in the EMISS form is included. Sorry for any inconvenience this may cause you.

3. This will be corrected and submitted. Note that the correct size is 44 MMBtu/hr.

4. The MACT ZZZZ discussion is correct. The major source definition for RICE MACT at oil and gas production facilities includes the MACT HH definition (dehydrators and flashing tanks) plus the addition of engine emissions. Please let me know if you are requesting different information.

After further review of this information and the applicable requirements, we agree with your discussion. We apologize for our earlier assessment.

5. This will be added and submitted. As listed in the current Statement of Basis, NSPS KKK does not apply because the site is not a natural gas processing plant (does not extract or fractionate natural gas liquids).
6. I agree about AP-42 formaldehyde factors for natural gas fired lean burn engines. I do not work with many diesel engines and was unaware of the discrepancy between AP-42 and actual formaldehyde emissions. My contact at Cummins could not find any formaldehyde factors for the twelve peaker engines, but he will complete an exhaustive search when everyone is back after the holidays. What do you suggest if I can not get Cummins to give us factors?

We typically rate emission estimate accuracy as follows:

A. Actual stack testing is the most accurate. We recognize that this is costly so we don't require this automatically, unless we've created synthetic minor limits or it is required by a regulation. However, the

Enforcement Office may at some point require testing to verify emissions for purposes of compliance to rules that potentially may apply. As has always been the case, the company would be responsible for any non-compliance concerns should the emissions estimates made with emissions factors not represent actual emissions as verified through stack testing.

B. Manufacturers emission factors have also proven to be relatively safe, especially where they are willing to guarantee them.

C. AP-42 is the least accurate as it is an industry average and doesn't take into consideration mitigating factors that could increase or decrease the factor.

D. Modeling is also available however the accuracy of the modeling is directly tied to the emission factor inputs used.

Although we can't tell you not to use AP-42, we do encourage you to use the most accurate factors that are available for your best interest (especially were TPY estimates are close to threshold levels which could trigger potentially applicable requirements). However, if AP-42 are the only factors available and stack testing is not feasible at this time, we will work with the AP-42 factors in processing the permit.

7. Will complete if necessary.

8. A CTAC will be submitted.

Thanks,

Deirdre Rothery
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