



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
<http://www.epa.gov/region08>**

JAN 31 2006

Ref: 8P-AR

Mr. Stan G. Page
Florida Operations Manager
BP America Production Company
2906 CR 307
Durango, CO 81303

Re: Renewal Application Completeness Determination
BP America Production Company Florida River Compression
Facility - Permit # V-SU-0022-00.04

Dear Mr. Page:

Thank you for submitting your renewal application for a 40 CFR Part 71 (Clean Air Act, Title V) Operating Permit for the BP America Production Company, Florida River Compression Facility, located in La Plata County, Colorado, and on the Southern Ute Indian Reservation. Your application was received by the Environmental Protection Agency on December 1, 2005 and supplemental information was received on January 18, 2006. This permitting action has been assigned to Kathleen Paser, and has been given permit number V-SU-0022-00.05.

Completeness Determination: Pursuant to 40 CFR 71.5, we have determined that the information submitted in the application is sufficient to begin processing the requested operating permit. In addition, we have verified that no fee payment was required with this application as you are already on a fee schedule and your payments are up to date. Therefore, this application is deemed complete on January 19, 2006.

Permit Renewal and Expiration: Your current permit, # V-SU-0022-00.04, expires on June 5, 2006. Pursuant to 40 CFR 71.7(c)(ii), permit expiration terminates your right to operate unless a timely and complete renewal application has been submitted consistent with §71.7(b) and §71.5(a)(1)(iii). The deadline for submitting a renewal application for this facility was December 5, 2005. Since your permit application for the Florida River Compression Facility has been found complete and was submitted by the renewal application deadline, your current permit will not expire until the renewal permit has been issued or denied. (See 40 CFR 71.7(c).)



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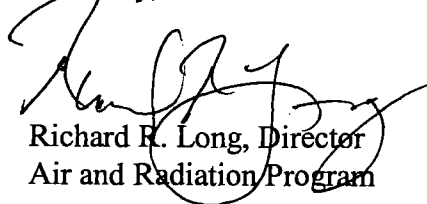
Duty to Provide Additional Information: Please be advised that this Operating Permit application completeness determination does not constitute a thorough evaluation of the merits of the application. If we determine that additional information is necessary to evaluate the application or to take final action on the application, we may request such information in writing and set a reasonable deadline for a response. (See 40 CFR 71.5(a)(2))

At this time, we are not requesting any additional information.

Duty to Correct/Update Application: If you find that you have omitted any relevant facts, or submitted incorrect information, you must promptly file corrections to your application with our office. In addition, if new regulations become applicable any time before we release the draft operating permit for this facility, you must provide additional information to us addressing those requirements. Please remember this completeness determination does not affect your obligation to obtain pre-construction permits for any new construction or modification activity which may be subject to 40 CFR 52.21 (Prevention of Significant Deterioration permitting) requirements. Furthermore, future changes at the facility, whether considered major or minor for construction permitting purposes, may necessitate updating your Part 71 Operating Permit Application.

If you have any questions concerning the completeness determination, the request for supplemental information, or the operating permit process, please contact your assigned permit engineer, Kathleen Paser, at 303-312-6526. We look forward to working with you in renewing your permit.

Sincerely,



Richard R. Long, Director
Air and Radiation Program

cc: Mr. Christopher Lee, SUIT Air Program Manager
Ms. Julie Best, BP Air Quality Specialist
Mr. Daniel Fauth, BP Environmental Coordinator



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Mr. Stan G. Page
Florida Operations Manager
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CONCURRENCE COPY

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K. Paser
8P-AR
1/19/06

C. Vidulich
8P-AR
1/25/06



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cc: Mr. Christopher Lee, SUIT Air Program Manager
Ms. Julie Best, BP Air Quality Specialist
Mr. Daniel Fauth, BP Environmental Coordinator



United States Environmental Protection Agency
Region VIII, Office of Air and Radiation

Federal Operating Permit Application Completeness Checklist

To be completed by review engineer within 60 days of receipt of the application. Criteria derived from 40 CFR Part 71 and the Part 71 application forms. To be deemed complete, an application must provide all information required pursuant to 40 CFR 71.5(c).

Source Name: BP American Production Company - Florida River Comp Far
Date Application Received: _____

Complete

Complete but needs additional information for drafting a permit (see comments below)

Reviewer's Name Deirdre Pothery Date Application Complete: _____

Check if complete

Source Identification [40 CFR 71.5(c)(1) & Application Form GIS parts A, B, C, & D]

- Facility's official name (not a colloquial name) provided
- Facility's complete mailing address provided
- Facility's location provided
- Owner information provided
- Operator information provided

Comments: _____

Application Information [Application Form GIS part E]

- Information on the type of permit being requested complete and understandable
- Date operations commenced provided (for initial permits)
- Expiration date of existing permit (for permit renewal) provided
- Description of proposed change (for modifications) provided. Are dates for the addition of units or the modification provided where needed?

Comments: _____

[✓]

Summary Source Information [40 CFR 71.5(c)(2) & Application Form GIS parts F, G, H, I J, K, L, & M]

- ✓ Applicable requirement summary complete
- Process description provided
- ✓ Emission unit identification and description provided
- ✓ Facility emissions summary provided
- ✓ Existing federally enforceable permits listed
- ✓ Emission units covered by general permits listed
- ✗ Cross-referenced information (e.g. - Do you have access to the information?)

Comments: _____

[✓]

Emission Unit Descriptions for Combustion Sources [40 CFR 71.5(c)(2) - (7) & Application Form EUD-1 parts A-F]

- ✓ General information (ID, description, SIC and SCC Codes, Control device IDs) for each unit provided. Does the unit ID coincide with Form GIS? The SIC code may be different than that listed in section G of Form GIS. The SCC code is not mandatory, but is useful because it identifies a specific process, the pollutants from that process, and related emissions factors.
- ✓ Unit description in its entirety completed (including installation dates)
- ✓ Fuel data provided
- ✓ Fuel usage rates provided
- ✓ Control equipment descriptions provided (Does it include an ID for the control equipment?)
- ✓ Ambient impact assessment provided (for temporary sources only)
- Additional attachments, if needed, to provide information to the permitting authority that is not specified on the form provided

Comments: _____

NSA

Emission Unit Description of VOC Emitting Sources [40 CFR 71.5(c)(2) - (7) & Application Form EUD-2 parts A - E]

- General information (ID, description, SIC and SCC Codes, Control device IDs) for each unit provided. Does the unit ID coincide with Form GIS? The SIC code may be different than that listed in section G of Form GIS. The SCC code is not mandatory, but is useful because it identifies a specific process, the pollutants from that process, and related emissions factors.
- Unit descriptions in its entirety provided (Including dates of installation)
- Control equipment descriptions provided (Does in include an ID for the control equipment?)
- Ambient impact assessment provided (for temporary sources only)
- Identification of VOC and HAP emitting substances complete
- Additional attachments, if needed, to provide information to the permitting authority that is not specified on the form provided

Comments: _____

NA

Emission Unit Description for Process Sources [40 CFR 71.5(c)(2) - (7) & Application Form EUD-3 parts A - F] This form should provide technical information, including operational characteristics, applicable requirements, compliance terms, and emissions for each emissions unit. There should be one form for each unit.

- General information (ID, description, SIC and SCC Codes, Control device IDs) for each unit provided. Does the unit ID coincide with Form GIS? The SIC code may be different than that listed in section G of Form GIS. The SCC code is not mandatory, but is useful because it identifies a specific process, the pollutants from that process, and related emissions factors.
- Unit description in its entirety provided (including dates of installation)
- Activity or production rates provided
- Control equipment descriptions provided (Does it include an ID for the control equipment?)
- Ambient impact assessment provided (for temporary sources only)
- Additional attachments, if needed, to provide information to the permitting authority that is not specified on the form provided

Comments: _____

[✓]

Insignificant Emission Activities or Units [40 CFR 71.5(c)(11) & Application Form IE]

- ✓ Listing of insignificant activities and emissions levels exempted because of size or production rate pursuant to 71.5(c)(11)(ii) provided
- ✓ Information provided sufficient to show that the exemption applies
- Information concerning equipment, activities, or emissions units that are exempted from an otherwise applicable requirements provided (e.g, emissions units grandfathered from requirements of a NSPS)

Comments: _____

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Emission Calculations for Each Unit [40 CFR 71.5(c)(2) - (7) & Application Form EMISS parts A & B]

- ✓ Emission unit identification provided (does the unit ID coincide with Form GIS?)
- ✓ Actual emission rates for each pollutant provided
- ✓ Potential emission rates for each pollutant provided
- CAS Number for each pollutant provided
- Example calculations illustrating the methodology used (formulas used, emission factors used, assumptions made, source of formulas or assumptions) provided

Comments: _____

[✓]

Potential to Emit Summary [40 CFR 71.5(c)(3) & Application Form PTE]

- ✓ Are all emission units identified? (does the unit ID coincide with Form GIS?)
- If the source is a major source for pollutants not listed is an attachment stipulating major source status or the calculations for that air pollutant provided?

This form is used to calculate the total PTE for each air pollutant at the facility for purposes of determining major source applicability. See the application instructions and definitions for major source at 40 CFR 71.2 to further determine completeness and accuracy of this section.

Comments: _____

NA

Fee Calculations [40 CFR 71.5(c)(3), 71.9, & Application Form FEE parts A - F]

- General information completed
- Source information completed
- Certification of truth, accuracy and completeness signed and dated
- Annual non-HAP emissions report provided
- Annual HAP emission report for fee calculation purposes provided
- attached example calculations used to determine emission values provided

Comments: _____

[✓]

Fee Filing [Application Form FF parts A - C]

- Facility's official or legal name provided
- Complete mailing address & telephone numbers of all contact persons provided
- Total amount of fee remitted in US dollars provided
- Photocopy of the fee payment check or other confirmation of actual fees paid provided

Comments: _____

[✓]

Fee Submittal Confirmed

- Has a confirmation been received by 8P-AR that fees and the fee filing form were deposited in the Region 8 Lockbox? Confirmation will come from Finance.

Comments: _____

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Compliance Status [40 CFR 71.5(c)(8) & Application Form I-Comp parts A, B, & C]

- Has each individual applicable requirement been identified and described in detail
- Has a citation for each applicable requirement been provided
- Has each emission unit subject to the applicable requirement been identified. Do the emission unit IDs correspond to the IDs defined on Form GIS
- Has the compliance status for each applicable requirement been identified
- Have the methods for determining compliance with each applicable requirement been provided
- Indication of compliance status with respect to each applicable requirements provided
- Indication that the source will comply with all applicable requirements that take effect during the permit term
- Indication that the source will meet all future requirements

Comments: _____

[✓]

Compliance Plans and Schedules [40 CFR 71.5(c)(8) & Application Form I-Comp parts D&E]

- For any applicable requirement for which the facility will not be compliance at time of issuance, is there a description of how the source will achieve compliance
- If needed, is there a compliance schedule containing a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance?
- Is the date of final compliance in the schedule?

Comments: _____

[✓]

Compliance Certification [Application Form I-Comp parts F, G, & H]

- Is there a schedule for submitting progress reports (where necessary)
- Schedule for submittal of certification provided
- Statement of compliance with enhanced monitoring and compliance certification requirements provided

Comments: _____

[✓]

Certification of Truth, Accuracy, & Completeness [40 CFR 71.5(d) & Form CTAC parts A & B]

- Responsible official information complete
- Signature by responsible official provided

Comments: _____

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Confidential Information [40 CFR 71.5(a)(3) & 40 CFR Part 2, subpart B]

- Confidentiality claim substantiated pursuant to 40 CFR Part 2 (This is not required for determining the application complete. However, it is necessary to determine that the claim is valid. ORC can help with this.)

Note to Application Reviewer:

In general, applications should be found complete if they contain enough information for you to begin to process the application. A determination of completeness is important for sources because the submittal of a timely and complete application shields the source from enforcement action for operating without a permit. Completeness in general means that all questions in the application have been addressed and are truthful and accurate.

Sources, however, are also required to submit enough information for you to be able to draft a comprehensive, enforceable permit. The level of detail required in the application to meet this requirement is usually much higher than that required for purposes of the completeness determination. If while processing an application that has been determined complete you find that additional information is needed, you may request such information in writing.

Please note in the space provided any additional information required. Note also the date of the request made to the source and the deadline for submittal provided to the source.

Comments: