



"Best, Julie A"  
<Julie.Drinkwater@bp.com>  
12/30/2005 11:42 AM

To Deirdre Rothery/P2/R8/USEPA/US@EPA  
cc Kathleen Paser/P2/R8/USEPA/US@EPA, "Fauth, Daniel P"  
<daniel.fauth@bp.com>  
bcc  
Subject RE: Florida Renewal Application

Ms. Rothery,  
We will submit the necessary data by January 27th. I have a couple of questions on the list below, and my comments are also noted.

1. Which EUD form should I use for the flare?
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.
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.
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?
7. Will complete if necessary.
8. A CTAC will be submitted.

I appreciate your help in processing the renewal application.

Thank you,  
Julie Best  
BP America Production Company  
Air Quality Specialist  
(281) 366-0405

-----Original Message-----

From: Rothery.Deirdre@epamail.epa.gov  
[mailto:Rothery.Deirdre@epamail.epa.gov]  
Sent: Wednesday, December 21, 2005 2:28 PM  
To: Best, Julie A  
Cc: Paser.Kathleen@epamail.epa.gov  
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,

Deirdre Rothery  
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