

United States Environmental Protection Agency
Region 8
Air Program
1595 Wynkoop Street
Denver, Colorado 80202



ADMINISTRATIVE RECORD

FOR ISSUANCE OF

BP AMERICA PRODUCTION COMPANY'S

FLORIDA RIVER COMPRESSION FACILITY

FINAL TITLE V PERMIT – RENEWAL #1

V-SU-0022-05.00

Southern Ute Indian Reservation in
La Plata County, Colorado
October 18, 2010

US EPA (EPA) Referenced Employees

Richard R. Long - Former Director, Air Program, Office of Partnership and Regulatory Assistance (OPRA), US EPA Region 8.

Monica Morales - Environmental Engineer, Air Permitting, Modeling, and Monitoring Unit (formerly Air Technical Assistance Unit, Office of Partnership and Regulatory Assistance (OPRA)), US EPA Region 8.

Kathleen Paser - Environmental Engineer, Air Permitting, Modeling, and Monitoring Unit (formerly Air Technical Assistance Unit, Office of Partnership and Regulatory Assistance (OPRA)), US EPA Region 8.

Deirdre Rothery - Environmental Scientist, Air Permitting, Modeling, and Monitoring Unit (formerly Air Technical Assistance Unit, Office of Partnership and Regulatory Assistance (OPRA)), US EPA Region 8.

Claudia Smith - Environmental Scientist, Air Permitting, Modeling, and Monitoring Unit, Air Program, Office of Partnership and Regulatory Assistance (OPRA), US EPA Region 8

Callie A. Videtich - Director, Air Program, Office of Partnership and Regulatory Assistance (OPRA), US EPA Region 8.

BP America Production Company (BP) Referenced Employees

Rebecca Tanory (now Rebecca Robert) – Air Quality Specialist, BP America Production Company, Houston Office

Julie A. Best – Environmental Specialist (formerly Air Quality Specialist), BP America Production Company, Durango Office

Kourtney K. Hadrick - Florida Operations Manager, BP America Production Company, Durango Office

Chad A. Tidwell – Former Operations Center Manager, BP America Production Company, Durango Office

Stan G. Page – Former Florida River Operations Manager, BP America Production Company, Durango Office

Daniel P. Fauth – P.E.; Environmental Coordinator, BP America Production Company, Durango Office

BP Attorney - Davis Graham & Stubbs LLP, representing BP

Document No.	Date	Description
EPA FL-0001	08-27-96	Analysis of the Applicability of Prevention of Significant Deterioration (PSD) to the Anheuser-Busch, Incorporated Brewery and Nutriturf, Incorporated Landfarm at Fort Collins, Colorado – Memorandum from Robert G. Kellam, Acting director Information Transfer & Program Integration Division, OAQPS, to Richard R. Long, Director Air Program, Region VIII; (4 pages)
EPA FL-0002	08-08-97	Great Salt Lakes Minerals – Letter from Richard R. Long, Director Air Program Region VIII, to Lynn Menlove, Manager New Source Review Section division of Air Quality Utah Department of Environmental Quality; (2 pages)
EPA FL-0003	05-21-98	Utility Trailer, Response to Request for Guidance in Defining Adjacent with Respect to Source Aggregation – Letter from Richard R. Long, Director Air Program Region VIII, to Lynn Menlove, Manager New Source Review Section division of Air Quality Utah Department of Environmental Quality; (4 pages)
EPA FL-0004	08-21-01	Forest Oil, Permitting of Forest Oil’s Kustatan Production Facility and Osprey Platform Pursuant to the Alaska SIP – Letter from Douglas E. Hardesty, Manager Federal and Delegated Air Programs Region X to John Kuterbach, Chief Air Quality Management Alaska Department of Environmental Conservation; (7 pages)
EPA FL-0005	12-01-05	Letter from BP (Daniel P. Fauth) to EPA (Monica Morales): Permit Application submittal for the first renewal of the Florida River Compression Facility Title V/Part 71 permit. (222 pages)
EPA FL-0006	12-21-05	E-mail from EPA (Deirdre Rothery) to BP (Julie Best): Request for additional information for the Florida River renewal application; (1 page)
EPA FL-0007	12-30-05	E-mail from BP (Julie Best) to EPA (Deirdre Rothery): response to EPA’s request for additional information seeking clarification of 12-21-05 EPA request; (2 pages)
EPA FL-0008	01-04-06	E-mail from EPA (Deirdre Rothery) to BP (Julie Best) and forwarded to EPA (Kathleen Paser) on 2/9/06: Answers to BP’s 12-30-05 request for clarification; (2 pages)
EPA FL-0009	01-05-06	Email from BP (Julie Best) to EPA (Deirdre Rothery): Further discussion on EPA’s request for information; (1 page)
EPA FL-0010	01-16-06	Letter from BP (Daniel P. Fauth) to EPA (Kathleen Paser): Hard copy submittal of the additional requested information; (27 pages)

EPA FL-0011	01-31-06	Letter from EPA (Richard R. Long) to BP (Stan G. Page): Renewal application completeness determination. Documents include the concurrence copy of the letter and the completeness checklist; (10 pages)
EPA FL-0012	03-14-06	Letter from BP (Chad Tidwell) to EPA (Kathleen Paser): Permit application for an administrative permit amendment; request to change the Responsible Official on record; (3 pages)
EPA FL-0013	01-12-07	Source Determinations for Oil and Gas Industries – Memorandum from William L. Werhum, Acting Assistant Administrator, to Regional Administrators, Region I – X; (5 pages)
EPA FL-0014	08-07-07	Letter from BP (Chad Tidwell) to EPA (Kathleen S. Paser): Permit application for an administrative permit amendment; request to change the Alternate Responsible Official on record, the Facility Contact, and the mailing address; (4 pages)
EPA FL-0015	10-31-07	Letter from BP (Kortney K. Hadrick) to EPA (Kathleen Paser); Permit application for an administrative permit amendment; request to change the Responsible Official on record; (2 pages)
EPA FL-0016	11-08-07	Letter from EPA (Kathleen S. Paser) to BP (Rebecca Tanory, David P. McKenna, Julie A. Best, Dennis E. Scott, Melanie M. Hill); Form letter notification to all Title V/Part 71 regulated facilities regarding the change in the mailing address for annual fee payments; (5 pages)
EPA FL-0017	03-28-08	Letter from EPA (Callie A. Videtich) to BP (Kourtney K. Hadrick): Draft Title V Permit and Statement of Basis submitted for public comment with attachments; (83 pages)
EPA FL-0018	04-02-08	Thirteen letters from EPA (Claudia Smith) to the La Plata County Clerk, Southern Ute Environmental Program Office, the Colorado Department of Health and Environment, the New Mexico Environment Department, the Ute Mountain Ute Tribe, the Navajo Nation Air Quality Control Program, the Jicarilla Apache Tribe Environmental Protection Office, the Mayor of Ignacio, the National Park Service, the USDA Forest Service, the San Juan Citizens Alliance, Mr. Carl Weston, Mr. Jeremy Nichols, Wild Earth Guardians (formerly Director of Rocky Mountain Clean Air Action): Transmittal of the draft Title V operating permit and Statement of Basis; (25 pages)
EPA FL-0019	04-11-08	Certified Mail Manifest and copies of the US Postal Service Certified Mail Receipts for letters mailed out on 04/02/2008; (7 pages)

EPA FL-0020	04-18-08	Public notice published in the Durango Herald. Includes routing for funding and communications with the news paper; (24 pages)
EPA FL-0021	05-09-08	Proof of Publication: Proof that the notice for public comment was published in the Durango Herald on April 18, 2008; (1 page)
EPA FL-0022	05-19-08	Letter from Rocky Mountain Clean Air Action (Jeremy Nichols, now with Wild Earth Guardians) to EPA (Claudia Smith): Comments on the draft Title V renewal permit for the Florida River Compression Facility; (446 pages)
EPA FL-0023	05-19-08	E-mail from BP (Rebecca Tanory) to EPA (Kathleen Paser): Comments on the draft Title V renewal permit for the Florida River Compression Facility; (3 pages)
EPA FL-0024	05-20-08	E-mail from EPA (Claudia Smith) to BP (Rebecca Tanory): Notification of EPA's receipt of public comments from Rocky Mountain Clean Air Action (Jeremy Nichols, now with Wild Earth Guardians). Attachment of comments provided to BP; (1 page)
EPA FL-0025	05-20-08	E-mail from BP (Rebecca Tanory) to EPA (Claudia Smith): Confirmation of receipt of 05-20-08 of comments from Mr. Jeremy Nichols, Wild Earth Guardians (formerly Director of Rocky Mountain Clean Air Action); (1 page)
EPA FL-0026	05-21-08	E-mail from BP (Rebecca Tanory) to EPA (Claudia Smith): Clarifying comments 4(d) and 7(b) of the 5/19/08 e-mail of comments from BP on the draft permit (1 page of this date, includes prior email string)
EPA FL-0027	09-22-09	Withdrawal of Source Determinations for Oil and Gas Industries – Memorandum from Gina McCarthy, Assistant Administrator, to Regional Administrators, Region I – X; (2 pages)
EPA FL-0028	11-02-09	E-mail from BP (Rebecca Tanory) to EPA (Claudia Smith), forwarded to Kathleen Paser, 11/3/09: A system flow diagram; (2 pages)
EPA FL-0029	12-17-09	Letter from BP (Julie Best) to EPA (Claudia Smith): A description of the process flow in the San Juan Basin; (8 Pages)
EPA FL-0030	12-21-09	Letter from BP (Rebecca Tanory) to EPA (Claudia Smith): Clarification of the non-CBI description of process flow provided in the 12/17/09 letter and a non-CBI system map show the proximity of well sites in conjunction with the Florida River Compression Facility; (4 pages)
EPA FL-0031	12-22-09	E-mail from EPA (Kathleen Paser) to BP (Rebecca Tanory): Confirmation of EPA receipt of the 12/21/09

		letter from BP and a request for a pipeline map or a hand sketched diagram of pipelines in the field; (1 page)
EPA FL-0032	01-05-10	E-mail from BP (Rebecca Tanory) to EPA (Kathleen Paser): Confirmation that BP is working on developing a pipeline map; (1 page)
EPA FL-0033	02-17-10	Letter from BP attorney, Charles L. Kaiser, Davis, Graham & Stubbs, LLP. to EPA (Claudia Smith): Transmittal of BP's supplemental comments regarding EPA's pending renewal of the Title V operating permit for the Florida River Compression Facility; (134 pages)
EPA FL-0034	03-03-10	Letter from BP (Julie Best) to EPA (Claudia Smith): Transmittal of a system flow diagram and pipeline maps; (8 pages)
EPA FL-0035	06-02-10	Letter from WEG to EPA (Administrator, Lisa Jackson): Notice of Intent to file Suit against the U.S, Environmental Protection Agency for failure to issue or deny a Title V permit administered by the EPA under 40 CFR part 71 within 18 months after receipt of complete application; (3 pages)
EPA FL-0036	10-18-10	Letter from EPA to WEG: Transmittal of Final Title V/Part 71 renewal permit #V-SU-0022-05.00 issued for BP's Florida River Compression Facility & EPA response to public comments on draft Florida River Compression Facility Title V/Part 71 renewal permit; (16 pages)
EPA FL-0037	10-18-10	Final Title V/Part 71 renewal permit #V-SU-0022-05.00 issued for BP's Florida River Compression Facility; (72 pages)
EPA FL-0038	10-18-10	Final Statement of Basis for Title V/Part 71 renewal permit #V-SU-0022-05.00 issued for BP's Florida River Compression Facility; (24 pages)
EPA FL-0039	11-05-10	Email from BP to EPA: Redacted version of Exhibit T (Gathering Agreement) from BP's supplemental comments regarding EPA's pending renewal of the Title V operating permit for the Florida River Compression Facility. (4 pages)
EPA FL-0040	11-05-10	Email from BP to EPA: Redacted version of Exhibit U (Gathering Agreement) from BP's supplemental comments regarding EPA's pending renewal of the Title V operating permit for the Florida River Compression Facility. (4 pages).
EPA FL-0041	11-05-10	Email from BP to EPA: Redacted version of Exhibit V (Gathering Agreement) from BP's supplemental comments regarding EPA's pending renewal of the Title V operating permit for the Florida River Compression Facility. (4 pages).
EPA FL-0042	10-18-10	Letter from EPA to BP America Production Co. regarding

		Florida River Compression Facility Title V Permit – Renewal #1 #V-SU-0022-05.00 (16 pages)
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