

ExxonMobil Production Company
12000 Calle Real
Goleta, California 93117



ExxonMobil
Production

December 8, 2011

Santa Ynez Unit
Exxon – SYU 2012 Permit Reevaluation

Ms. Stefanie Boehme
Santa Barbara County
Air Pollution Control District
260 North San Antonio Road, Suite A
Santa Barbara, California 93110

Dear Ms. Boehme:

ExxonMobil hereby submits the Part 70 Reevaluation applications for the Exxon – SYU stationary source, including Part 70/PTO 5651, 8092, 9100, 9101, and 9102. Enclosed please find the following:

- Title V Application Forms;
- APCD-1 Form;
- Additional Supporting Documentation

You are hereby authorized to deduct the subject permit fees from ExxonMobil's reimbursable account.

If you have any questions or comments please contact Katie Wilson at (281) 654-0742.

Sincerely,

Troy M. Tranquada
California Operations Superintendent

TMT/kew

Enclosure

c –w/enclosure

Ben Ellenberger
Santa Barbara County
Air Pollution Control District
260 North San Antonio Road, Suite A
Santa Barbara, California 93110



General Permit Application Form -01

Santa Barbara County Air Pollution Control District
PO Box 6447, Santa Barbara, CA 93160-6447

1. APPLICATION TYPE (check all that apply):

- Authority to Construct (ATC)
- Permit to Operate (PTO)
- ATC Modification
- PTO Modification
- Other (Specify) _____
- Transfer of Owner/Operator (use Form -01T)
- Emission Reduction Credits
- Increase in Production Rate or Throughput
- Decrease in Production Rate or Throughput

Previous ATC/PTO Number (if known) 5651, 8092, 9100, 9101, and 9102

Yes No Are Title 5 Minor Modification Forms Attached? (this applies to Title 5 sources only and applies to all application types except ATCs and Emission Reduction Credits). Complete Title 5 Form -1302 A1/A2, B, and M. Complete Title 5 Form -1302 C1/C2, D1/D2, E1/E2, F1/F2, G1/G2 as appropriate. [http://www.sbcapcd.org/eng/dl/appforms/t5-forms\(ver1.2\).pdf](http://www.sbcapcd.org/eng/dl/appforms/t5-forms(ver1.2).pdf)

Mail the completed application to the APCD's Engineering & Compliance Division (ECD) at the address listed above.

2. FILING FEE:

A \$325 application filing fee must be included with each application. The application filing fee is COLA-adjusted every July 1st. Please ensure you are remitting the correct current fee (the current fee schedule is available on the APCD's webpage at: <http://www.sbcapcd.org/fees.htm>). This filing fee will not be refunded or applied to any subsequent application. Payment may also be made by credit card by using the Credit Card Authorization Form at the end of this application.

3. IS YOUR PROJECT'S PROPERTY BOUNDARY LOCATED OR PROPOSED TO BE LOCATED WITHIN 1,000 FEET FROM THE OUTER BOUNDARY OF A SCHOOL? If yes, and the project results in an emissions increase, submit a completed Form -03 (*School Summary Form*) <http://www.sbcapcd.org/eng/dl/appforms/apcd-03.pdf> Yes No

If yes, provide the name of school(s) _____

Address of school(s) _____

City _____ Zip Code _____

4. DOES YOUR APPLICATION CONTAIN CONFIDENTIAL INFORMATION? If yes, please submit this information according APCD Policy & Procedure 6100-020 (*Handling of Confidential Information*). http://www.sbcapcd.org/eng/dl/eng_p-and-p/6100-020.pdf. Applications not following this P&P will be returned. Yes No

FOR APCD USE ONLY			DATE STAMP
FID	01482	Permit No.	5651-RS
Project Name	Las Flores Canyon		<div style="border: 2px solid blue; padding: 5px; text-align: center;"> <p>RECEIVED</p> <p>DEC 13 2011</p> <p>SBCAPCD</p> </div>
Filing Fee			
		202.E? YES / NO	

5. COMPANY/CONTACT INFORMATION:

Owner Info		<input checked="" type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name	ExxonMobil Production Company		
Doing Business As			
Contact Name	Todd Griffith	Position/Title	Regulatory Compliance Supervisor
Mailing Address	P.O. Box 4358, CORP-MI-3041		
City	Houston	State	TX Zip Code 77210-4358
Telephone	281-654-1001	Fax	
		Email	

Operator Info		<input checked="" type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name	Same as Owner Information		
Doing Business As			
Contact Name		Position/Title	
Mailing Address			
City		State	
Zip Code			
Telephone		Fax	
		Email	

Authorized Agent Info*		<input type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name			
Doing Business As			
Contact Name		Position/Title	
Mailing Address			
City		State	
Zip Code			
Telephone		Fax	
		Email	

*Use this section if the application is not submitted by the owner/operator. Complete APCD Form -01A (<http://www.sbcapcd.org/eng/dl/appforms/apcd-01a.pdf>). Owner/Operator information above is still required.

SEND PERMITTING CORRESPONDENCE TO (check all that apply):			
<input checked="" type="checkbox"/> Owner	<input checked="" type="checkbox"/> Operator	<input type="checkbox"/> Authorized Agent	<input type="checkbox"/> Other (attach mailing information)

6. GENERAL NATURE OF BUSINESS OR AGENCY:

Oil and gas exploration and production

7. EQUIPMENT LOCATION (Address):

Specify the street address of the proposed or actual equipment location. If the location does not have a designated address, please specify the location by cross streets, or lease name, UTM coordinates, or township, range, and section.

Equipment Address	12000 Calle Real		
City	Goleta	State	CA
		Zip Code	93117
Work Site Phone	8059614030		

Incorporated (within city limits) Unincorporated (outside city limits) Used at Various Locations

Assessors Parcel No(s):

8. PROJECT DESCRIPTION:

(Describe the equipment to be constructed, modified and/or operated or the desired change in the existing permit. Attach a separate page if needed):

Reevaluation of Part 70/APCD PTO's 5651, 8092, 9100, 9101, and 9102.

9. DO YOU REQUIRE A LAND USE PERMIT OR OTHER LEAD AGENCY PERMIT FOR THE PROJECT DESCRIBED IN THIS APPLICATION?: Yes No

A. If yes, please provide the following information

Agency Name	Permit #	Phone #	Permit Date

* The lead agency is the public agency that has the principal discretionary authority to approve a project. The lead agency is responsible for determining whether the project will have a significant effect on the environment and determines what environmental review and environmental document will be necessary. The lead agency will normally be a city or county planning agency or similar, rather than the Air Pollution Control District.

B. If yes, has the lead agency permit application been deemed complete and is a copy of their completeness letter attached?

Yes No

Please note that the APCD will not deem your application complete until the lead agency application is deemed complete.

C. If the lead agency permit application has not been deemed complete, please explain.

D. A copy of the final lead agency permit or other discretionary approval by the lead agency may be requested by the APCD as part of our completeness review process.

10. PROJECT STATUS:

- A. Date of Equipment Installation
- B. Have you been issued a Notice to Comply (NTC) or Notice of Violation (NOV) for not obtaining a permit for this equipment/modification *and/or* have you installed this equipment without the required APCD permit(s)? If yes, the application filing is double per Rule 210. Yes No
- C. Is this application being submitted due to the loss of a Rule 202 exemption? Yes No
- D. Will this project be constructed in multiple phases? If yes, attach a separate description of the nature and extent of each project phase, including the associated timing, equipment and emissions. Yes No
- E. Is this application also for a change of owner/operator? If yes, please also include a completed APCD Form -01T. Yes No

11. APPLICANT/PREPARER STATEMENT:

The person who prepares the application also must sign the permit application. The preparer may be an employee of the owner/operator or an authorized agent (contractor/consultant) working on behalf of the owner/operator (an *Authorized Agent Form -01A* is required).

I certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct.

<i>Katherine E Wilson</i>	12/07/11
Signature of application preparer	Date
Katherine E Wilson	ExxonMobil Production Company
Print name of application preparer	Employer name

12. APPLICATION CHECKLIST (*check all that apply*)

- Application Filing Fee (Fee = \$325. The application filing fee is COLA adjusted every July 1st. Please ensure you are remitting the current fee.) As a convenience to applicants, the APCD will accept credit card payments. If you wish to use this payment option, please complete the attached *Credit Card Authorization Form* and submit it with your application.
- Existing permitted sources may request that the filing fee be deducted from their current reimbursable deposits by checking this box. Please deduct the filing fee from my existing reimbursement account.
- Form -01T (*Transfer of Owner/Operator*) attached if this application also addresses a change in owner and/or operator status from what is listed on the current permit. <http://www.sbcapcd.org/eng/dl/appforms/apcd-01t.pdf>
- Form -03 (*School Summary Form*) attached if the project's property boundary is within 1,000 feet of the outer boundary of a school (k-12) and the project results in an emissions increase. <http://www.sbcapcd.org/eng/dl/appforms/apcd-03.pdf>
- Information required by the APCD for processing the application as identified in APCD Rule 204 (*Applications*), the APCD's *General APCD Information Requirements List* (<http://www.sbcapcd.org/eng/dl/other/gen-info.pdf>), and any of the APCD's Process/Equipment Summary Forms (<http://www.sbcapcd.org/eng/dl/dl01.htm>) that apply to the project.
- Form -01A (*Authorized Agent Form*) attached if this application was prepared by and/or if correspondence is requested to be sent to an Authorized Agent (e.g., contractor or consultant). This form must accompany each application. <http://www.sbcapcd.org/eng/dl/appforms/apcd-01a.pdf>
- Confidential Information submitted according to APCD Policy & Procedure 6100-020.

13. NOTICE OF CERTIFICATION:

All applicants must complete the following Notice of Certification. This certification must be signed by the Authorized Company Representative representing the owner/operator. Signatures by Authorized Agents will not be accepted.

NOTICE of CERTIFICATION

I, Troy M. Tranquada, am employed by or represent
Type or Print Name of Authorized Company Representative

ExxonMobil Production Company (A Subsidiary of ExxonMobil Oil Corporation)
Type or Print Name of Business, Corporation, Company, Individual, or Agency

(hereinafter referred to as the applicant), and certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct and the equipment listed herein complies or can be expected to comply with said rules and regulations when operated in the manner and under the circumstances proposed. If the project fees are required to be funded by the cost reimbursement basis, as the responsible person, I agree that I will pay the Santa Barbara County Air Pollution Control District the actual recorded cost, plus administrative cost, incurred by the APCD in the processing of the application within 30 days of the billing date. If I withdraw my application, I further understand that I shall inform the APCD in writing and I will be charged for all costs incurred through closure of the APCD files on the project.

For applications submitted for Authority to Construct, modifications to existing Authority to Construct, and Authority to Construct/Permit to Operate permits, I hereby certify that all major stationary sources in the state and all stationary sources in the air basin which are owned or operated by the applicant, or by an entity controlling, controlled by, or under common control with the applicant, are in compliance, or are on approved schedule for compliance with all applicable emission limitations and standards under the Clean Air Act (42 USC 7401 *et seq.*) and all applicable emission limitations and standards which are part of the State Implementation Plan approved by the Environmental Protection Agency.

Completed By: Katherine E. Wilson Title: Environmental Engineer

Date: 12/8/11 Phone: 281-654-0742

Signature of Authorized Company Representative 

PLEASE NOTE THAT FAILURE TO COMPLETELY PROVIDE ALL REQUIRED INFORMATION OR FEES WILL RESULT IN YOUR APPLICATION BEING RETURNED OR DEEMED INCOMPLETE.

EXEMPT EMISSIONS UNITS (Form 1302-H)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: ExxonMobil Production Company and Pacific Offshore Pipeline Company	SOURCE NAME: Exxon - SYU

Are you claiming any emitting activities to be insignificant? (See definition at bottom of page)

YES NO

I. ACTIVITIES CLAIMED TO BE INSIGNIFICANT (Attach supporting calculations)

Activity	Description of Activity/Emission Units	Potential to Emit for each Pollutant
See existing insignificant activity list/discussion in current permit. Table 5.9 – Estimated Exempt Emissions		

****Note,** the existing TEG Reboiler (E-121) has been permitted according to APCD Rule 361, therefore it is no longer considered exempt per APCD Rule 202, however its emissions remain insignificant per Part 70 and APCD Rule 1301.

Insignificant activities are defined in APCD Rule 1301 (definitions). For an activity to be considered insignificant emissions cannot exceed 2 tons per year potential to emit (PTE) any criteria pollutants, and 0.5 tons per year for any regulated HAP.

Note: Insignificant activities are not exempt from Part 70 requirements/permits.

COMPLIANCE PLAN (Form 1302-I1)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY <
COMPANY NAME:	APCD IDS Processing ID:
	SOURCE NAME:

I. PROCEDURE FOR USING FORM 1302-I

☞ This form shall be submitted as part of the SBCAPCD's Regulation XIII Application. The Responsible Official shall identify the applicable federal requirement(s) to which the source is subject. In the Compliance Plan (Form 1302-I), a Responsible Official shall identify whether the source identified in the SBCAPCD's Regulation XIII Application currently operates in compliance with all applicable federal requirements.

II. APPLICABLE FEDERAL REQUIREMENTS

Applicable Federal Requirement ¹		Affected Emission Unit	In compliance? (yes/no/exempt ³)	Effective Date ⁴
Regulatory Reference ²	Regulation Title ²			
See section 3 of existing Part 70/APCD PTO 8092.				
40 CFR Part 63 Subpart ZZZZ	NESHAP for Stationary Reciprocating Internal Combustion Engines	Emergency electrical generator engines (2), Firewater Pumps (2)	Yes	03/09/2011
1 Review APCD SIP Rules, NSPS, NESHAPS, and MACTs . 2 Regulatory Reference is the abbreviated citation (e.g. 40 CFR 60 Subpart OOO, APCD Rule 325.H) and Title is the prosaic title (e.g. NSPS Standards of Performance for Nonmetallic Mineral Processing Plants, Crude Oil Production and Separation, Inspection) 3 If exempt from applicable federal requirement, include explanation for exemption. 4 Indicate the date during the permit term that the applicable federal requirement will become effective for the emission unit.				

Other Applicable Federal Requirements ⁵	Affected Emission Unit	In compliance?	Effective Date
ATC 13163	T-601, Carbon Canister	Yes	07/27/2009
ATC/PTO 13488	Fugitive Components	Yes	TBD - 2011
Adm/Part 70 13743	Responsible Official Designation	Yes	2011
5 All environmentally significant permit conditions -- such as emission, operation, and throughput limitations or compliance monitoring conditions associated with such limitations -- listed in all authority to construct (ATC) permits issued to the Part 70 source are also applicable requirements.			

*** If more than one page is used, please ensure that "Santa Barbara APCD", stationary source name and "Form 1302-I1" appear on each page. ***

COMPLIANCE PLAN (Form 1302-I2)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: ExxonMobil Production Company and Pacific Offshore Pipeline Company	SOURCE NAME: Exxon - SYU

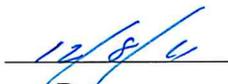
III. COMPLIANCE CERTIFICATION

Under penalty of perjury, I certify the following:

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) with which the source is in compliance identified in form 1302-I1;**
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with the future-effective applicable federal requirement(s) identified in form 1302-I1, on a timely basis¹;**
- Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance with the applicable federal requirement(s), identified in form 1302-I1, and I have attached a compliance plan schedule.²**



 Signature of Responsible Official



 Date

1. Unless a more detailed schedule is expressly required by the applicable federal requirement.
2. At the time of expected permit issuance, if the source expects to be out of compliance with an applicable federal requirement, the applicant is required to provide a compliance schedule with this application, with the following exception. A source which is operating under a variance that is effective for less than 90 days need not submit a Compliance Schedule. For sources operating under a variance, which is in effect for more than 90 days, the Compliance Schedule is the schedule that was approved as part of the variance granted by the hearing board.

The compliance schedule shall contain a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with this applicable federal requirement. For sources operating under a variance, the compliance schedule is part of the variance granted by the hearing board. The compliance schedule shall resemble, and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. For sources not operating under a variance, consult the Air Pollution Control Officer regarding procedures for obtaining a compliance schedule.

CERTIFICATION STATEMENT (Form 1302-M)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS PROCESSING ID:
COMPANY NAME: ExxonMobil Production Company and Pacific Offshore Pipeline Company	SOURCE NAME: Exxon - SYU

Identify, by checking off below, the forms and attachments that are part of your application. If the application contains forms or attachments that are not identified below, please identify these attachments in the blank space provided below. Review the instructions if you are unsure of the forms and attachments that need to be included in a complete application.

Forms included with application

Stationary Source Summary Form
 Total Stationary Source Emission For -
 Compliance Plan Form
 Compliance Plan Certification Form
 Exempt Equipment Form
 Certification Statement Form

List other forms or attachments

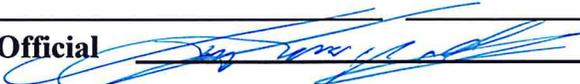
[] check here if additional forms listed on back

Attachments included with application

Description of Operating Scenarios
 Sample emission calculations
 Fugitive emission estimates
 List of Applicable requirements
 Discussion of units out of compliance with applicable federal requirements and, if required, submit a schedule of Compliance
 Facility schematic showing emission points
 NSR Permit
 PSD Permit
 Compliance Assurance monitoring protocols
 Risk management verification per 112(r)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in SBCAPCD's Regulation XIII, Rule 1301 or USEPA's 40 CFR Part 70.

Signature of Responsible Official  **Date** 12/8/11

Print Name of Responsible Official: Troy M. Tranquada

Title of Responsible Official and Company Name: California Operations Superintendent
ExxonMobil Production, USA

**CERTIFICATION STATEMENT
(Form 1302-M continued)**

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS PROCESSING ID:
COMPANY NAME: ExxonMobil Production Company and Pacific Offshore Pipeline Company	SOURCE NAME: Exxon - SYU

List Other Forms or Attachments (cont.)

Reevaluation Comment Table on PTO 8092 and Part 70 Operating Permit 8092

**RE-EVALUATION COMMENTS ON PTO/Part 70 PERMIT NO. 8092
EXXONMOBIL- SYU PROJECT
POPCO Gas Plant (FID 3170)**

The table below lists ExxonMobil's issues and proposed resolution for specific items in referenced permit.

Equipment Affected	Section	Issue	Proposed Resolution	Comments
Permit History	1.2.2	Update facility permitting history.	Include: <ul style="list-style-type: none"> • ATC 13163 • ATC 13488, and • Adm/Part 70 13743. 	
Responsible Official	1.6.9	Update responsible official designation	See Adm/Part 70 – 13743 identifying Troy M. Tranquada as the responsible official.	
Fugitive Components	3.1	Update Rule 202 – De Minimis subtotal.	See the Semi-Annual Compliance Verification Report submitted September 1, 2011 for the latest update.	

**RE-EVALUATION COMMENTS ON PTO/Part 70 PERMIT NO. 8092
EXXONMOBIL- SYU PROJECT
POPCO Gas Plant (FID 3170)**

Equipment Affected	Section	Issue	Proposed Resolution	Comments
Emergency Standby and Firewater Pump Engines	3.2	The recently finalized MACT for Reciprocating Internal Combustion Engines (RICE) – 40 CFR 63 Subpart ZZZZ applies to the operation of the emergency standby and firewater pump engines.	<p>Include a discussion regarding the applicability of this regulation based on POPCO’s designation as a “Major Source”.</p> <p>“The emergency standby generators and firewater pump engines are considered <i>Existing Emergency Stationary RICE</i> at a Major Source of HAPs under 40 CFR 63 Subpart ZZZZ. These engines were not subject to any initial compliance determinations or notifications. In addition no operating limits, fuel requirements, or performance tests are required. These engines are subject to the work, operation, and management practice items defined in Tables 2c and 6 of the regulation in addition to recordkeeping and reporting requirements. Implementation of these requirements is due by May 3, 2013.”</p>	
Sulfinol TEG Reboiler	Table 5.2	The SOx emission factor listed is not correct.	Per Section 4.2.2 of the permit, the SOx emission factor should be based on PUC quality natural gas meeting the specifications of General Order – 58a. This assumes a HHV of 1,050 Btu/scf and 85 ppmvd as S, which results in an emission factor of 0.0137 lb/MMBtu.	

**RE-EVALUATION COMMENTS ON PTO/Part 70 PERMIT NO. 8092
EXXONMOBIL- SYU PROJECT
POPCO Gas Plant (FID 3170)**

Equipment Affected	Section	Issue	Proposed Resolution	Comments
Boilers	9.C.1.(a)(v)	This condition restricts the SOx emissions from each boiler (with tailgas present) to 5.44 lb/hr. This limit is not enforceable as it does not factor in the 0.11 lb/hr of fuel gas based SOx assumed to be released with the tailgas emissions.	Propose that the combined tail gas and fuel gas limit be revised to 5.55 lb/hr consistent with the approach taken with NOx.	
	9.C.1.(b)(v)	This condition restricts the amount of steam allowed to be injected. Steam injection is a control system necessary to insure compliance with Rule 342; Rule 342 does not set limits on steam injection..	Propose that the condition be revised as follows: “Steam injection shall be used to insure compliance with Rule 342.”	
Thermal Oxidizer	9.C.2(b)(iv)	Compliance with the planned continuous flaring sulfur limit is based on the results of weekly sampling as described in 9.C.2(c)(x). In contrast, LFC is only required to demonstrate compliance on a quarterly average basis – See LFC Part 70/PTO 5651 9.C.2(b)(iii).	Request that POPCO’s Planned Continuous Flaring Sulfur Limit condition be revised consistent with LFC’s such the compliance with the sulfur limit is enforced on an average quarterly basis. Weekly sampling will continue as currently defined in (c)(x), however the weekly samples will be averaged on a quarterly basis as is done for LFC.	
Stretford Oxidizer tanks	9.C.7(c)(ii)	The Stretford oxidizer tanks are required to be source tested for ROCs. Tests conducted since the mid 1990’s have resulted in little to no ROC emissions. Preparation for the 3 hour test is significant, taking 2-3 days to build scaffolding and necessary covers to trap any vapors.	Request that the source testing requirement be removed as tests conducted to date have not demonstrated any potential compliance issue.	

**RE-EVALUATION COMMENTS ON PTO/Part 70 PERMIT NO. 8092
EXXONMOBIL- SYU PROJECT
POPCO Gas Plant (FID 3170)**

Equipment Affected	Section	Issue	Proposed Resolution	Comments
Emergency Diesel Fired Engines	9.C.10	Condition 9.C.24 describes the recordkeeping requirements for the emergency generators and firewater pump engines per Rule 333, however there is not a corresponding reporting condition in the Semi-Annual Compliance Verification Report condition, 9.C.10.	Request that a section be added to 9.C.10 specifically identifying the reporting requirements associated with the emergency engines per Rule 333 recordkeeping. Note that this condition should also reflect the reporting requirements of the ATCM per Condition 9.D.1 which requires an annual report of operations as described in the ATCM.	
Thermal Oxidizer	9.C.10(b)(3)	The record of planned infrequent flaring events that exceed for events per year is included in section (b)(5) in addition to section (b)(3) of the CVR.	Request that Section (b)(3) be removed as section (b)(5) is a more comprehensive record of flaring activities including the required record of planned infrequent events. This is consistent with the recordkeeping/reporting requirement for LFC flaring.	
Source Testing	9.C.18(b)	The source testing condition requires that ExxonMobil submit a source test plan for approval prior to initiating a source test. If there have been no modifications to the equipment requiring a source test, a new plan should not be necessary.	Request that this condition be revised to specify that a source test plan be submitted for approval for new equipment, or modifications to existing equipment. Otherwise, existing unmodified equipment will be source tested based on the existing approved source test plan. ExxonMobil will still notify the APCD at least 10 calendar days prior to source testing as is currently described in the condition.	

**RE-EVALUATION COMMENTS ON PTO/Part 70 PERMIT NO. 8092
EXXONMOBIL- SYU PROJECT
POPCO Gas Plant (FID 3170)**

Equipment Affected	Section	Issue	Proposed Resolution	Comments
Emergency Diesel Fired Engines	9.C.24 (b) and (c)	The recordkeeping and reporting sections refer to Rule 333.H. This reference is incorrect.	Change reference to Rule 333.J consistent with the current version of the rule.	
Emergency Diesel Fired Engines	9.D.1.(e)	The APCD only condition pertaining to the diesel fired engines requires a separate written report of engine operations per the ATCM.	Request that this condition be revised to allow for this information to be submitted as part of the semi-annual compliance verification report submitted March 1 st instead of as a separate document submittal.	

STATIONARY SOURCE SUMMARY (Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District

COMPANY NAME: ExxonMobil Production Company

➤ APCD USE ONLY ◀

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee*:

Date Application Deemed Complete:

I. SOURCE IDENTIFICATION

1. Source Name: Exxon - Santa Ynez Unit
2. Four digit SIC Code: 1311 USEPA AIRS Plant ID (for APCD use only): 1482
3. Parent Company (if different than Source Name): ExxonMobil Production Company
4. Mailing Address of Responsible Official: P.O. Box 4358, Houston, TX 77210
5. Street Address of Source Location (include Zip Code): 12000 Calle Real, Goleta, CA 93117
6. UTM Coordinates (if required) (see instructions):
7. Source located within: 50 miles of the state line Yes No
50 miles of a Native American Nation Yes No Not Applicable
8. Type of Organization: Corporation Sole Ownership Government Partnership Utility Company
9. Legal Owner's Name: ExxonMobil Production Company
10. Owner's Agent Name (if any): NA Title: Telephone #:
11. Responsible Official: Troy M. Tranquada Title: California Operations Superintendent Telephone #: (805)-961-4078
12. Plant Site Manager/Contact: Troy M. Tranquada Title: California Operations Superintendent Telephone #: (805)-961-4078
13. Type of facility: Oil and Gas Processing Facility
14. General description of processes/products: See Section 2 of Part 70 PTO 5651
15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see Attachment A)? Yes No
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required? Not Applicable Yes No
(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.) *Verification regarding this submittal has already been submitted to the District.*

* Applications submitted without a filing fee will be returned to the applicant immediately as "improper" submittals

EXEMPT EMISSIONS UNITS (Form 1302-H)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: ExxonMobil Production Company	SOURCE NAME: Exxon - SYU

Are you claiming any emitting activities to be insignificant? (See definition at bottom of page)

YES NO

I. ACTIVITIES CLAIMED TO BE INSIGNIFICANT (Attach supporting calculations)

Activity	Description of Activity/Emission Units	Potential to Emit for each Pollutant
See existing insignificant activity list/discussion in current permit. Table 5.9 – Estimated Exempt Emissions		

Insignificant activities are defined in APCD Rule 1301 (definitions). For an activity to be considered insignificant emissions cannot exceed 2 tons per year potential to emit (PTE) any criteria pollutants, and 0.5 tons per year for any regulated HAP.

Note: Insignificant activities are not exempt from Part 70 requirements/permits.

COMPLIANCE PLAN (Form 1302-I1)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: ExxonMobil Production Company	SOURCE NAME: Exxon - SYU

I. PROCEDURE FOR USING FORM 1302-I

☞ This form shall be submitted as part of the SBCAPCD's Regulation XIII Application. The Responsible Official shall identify the applicable federal requirement(s) to which the source is subject. In the Compliance Plan (Form 1302-I), a Responsible Official shall identify whether the source identified in the SBCAPCD's Regulation XIII Application currently operates in compliance with all applicable federal requirements.

II. APPLICABLE FEDERAL REQUIREMENTS

Applicable Federal Requirement ¹		Affected Emission Unit	In compliance? (yes/no/exempt ³)	Effective Date ⁴
Regulatory Reference ²	Regulation Title ²			
See section 3 of existing Part 70/APCD PTO 5651.				
40 CFR Part 63 Subpart ZZZZ	NESHAP for Stationary Reciprocating Internal Combustion Engines	Floodwater Pump Engine, Firewater Pump Engines (2)	Yes	03/09/2011
1 Review APCD SIP Rules, NSPS, NESHAPS, and MACTs . 2 Regulatory Reference is the abbreviated citation (e.g. 40 CFR 60 Subpart OOO, APCD Rule 325.H) and Title is the prosaic title (e.g. NSPS Standards of Performance for Nonmetallic Mineral Processing Plants, Crude Oil Production and Separation, Inspection) 3 If exempt from applicable federal requirement, include explanation for exemption. 4 Indicate the date during the permit term that the applicable federal requirement will become effective for the emission unit.				

Other Applicable Federal Requirements ⁵	Affected Emission Unit	In compliance?	Effective Date
See existing Part 70/APCD PTO 5651	See permit	Yes	6/12/2009
ATC 13487	Fugitive Components	Yes	8/15/2011
ATC 13545	Cogeneration Power Plant	Yes	07/19/2011
Adm/Part 70 13742	Responsible Official Designation	Yes	2011
5 All environmentally significant permit conditions -- such as emission, operation, and throughput limitations or compliance monitoring conditions associated with such limitations -- listed in all authority to construct (ATC) permits issued to the Part 70 source are also applicable requirements.			

*** If more than one page is used, please ensure that "Santa Barbara APCD", stationary source name and "Form 1302-I1" appear on each page. ***

COMPLIANCE PLAN (Form 1302-I2)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: ExxonMobil Production Company	SOURCE NAME: Exxon - SYU

III. COMPLIANCE CERTIFICATION

Under penalty of perjury, I certify the following:

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) with which the source is in compliance identified in form 1302-I1;**
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with the future-effective applicable federal requirement(s) identified in form 1302-I1, on a timely basis¹;**
- Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance with the applicable federal requirement(s), identified in form 1302-I1, and I have attached a compliance plan schedule.²**



 Signature of Responsible Official



 Date

1. Unless a more detailed schedule is expressly required by the applicable federal requirement.
2. At the time of expected permit issuance, if the source expects to be out of compliance with an applicable federal requirement, the applicant is required to provide a compliance schedule with this application, with the following exception. A source which is operating under a variance that is effective for less than 90 days need not submit a Compliance Schedule. For sources operating under a variance, which is in effect for more than 90 days, the Compliance Schedule is the schedule that was approved as part of the variance granted by the hearing board.

The compliance schedule shall contain a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with this applicable federal requirement. For sources operating under a variance, the compliance schedule is part of the variance granted by the hearing board. The compliance schedule shall resemble, and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. For sources not operating under a variance, consult the Air Pollution Control Officer regarding procedures for obtaining a compliance schedule.

CERTIFICATION STATEMENT (Form 1302-M)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS PROCESSING ID:
COMPANY NAME: ExxonMobil Production Company	SOURCE NAME: Exxon - SYU

Identify, by checking off below, the forms and attachments that are part of your application. If the application contains forms or attachments that are not identified below, please identify these attachments in the blank space provided below. Review the instructions if you are unsure of the forms and attachments that need to be included in a complete application.

Forms included with application

Stationary Source Summary Form
 Total Stationary Source Emission For -
 Compliance Plan Form
 Compliance Plan Certification Form
 Exempt Equipment Form
 Certification Statement Form

List other forms or attachments

[] check here if additional forms listed on back

Attachments included with application

Description of Operating Scenarios
 Sample emission calculations
 Fugitive emission estimates
 List of Applicable requirements
 Discussion of units out of compliance with applicable federal requirements and, if required, submit a schedule of Compliance
 Facility schematic showing emission points
 NSR Permit
 PSD Permit
 Compliance Assurance monitoring protocols
 Risk management verification per 112(r)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in SBCAPCD's Regulation XIII, Rule 1301 or USEPA's 40 CFR Part 70.

Signature of Responsible Official  **Date** 2/8/11

Print Name of Responsible Official: Troy M. Tranquada

Title of Responsible Official and Company Name: California Operations Superintendent
ExxonMobil Production Company

**CERTIFICATION STATEMENT
(Form 1302-M continued)**

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS PROCESSING ID:
COMPANY NAME: ExxonMobil Production Company	SOURCE NAME: Exxon - SYU

List Other Forms or Attachments (cont.)

Reevaluation Comment Table on PTO 5651 and Part 70 Operating Permit 5651

**RE-EVALUATION COMMENTS ON PTO/Part 70 PERMIT NO. 5651
EXXONMOBIL- SYU PROJECT
LAS FLORES CANYON (FID 1482)**

The table below lists ExxonMobil's issues and proposed resolution for specific items in referenced permit.

Equipment Affected	Section	Issue	Proposed Resolution	Comments
Permit History	1.2.2	Update facility permitting history.	Include <ul style="list-style-type: none"> • ATC 13487 • ATC/PTO 13545 • Adm/Part 70 13742 	
Responsible Official	1.6.9	Update responsible official designation	See Adm/Part 70 – 13742 identifying Troy M. Tranquada as the responsible official.	
Fugitive Components	3.1	Update Rule 202 – De Minimis subtotal.	See the Semi-Annual Compliance Verification Report submitted September 1, 2011 for the latest update.	

**RE-EVALUATION COMMENTS ON PTO/Part 70 PERMIT NO. 5651
EXXONMOBIL- SYU PROJECT
LAS FLORES CANYON (FID 1482)**

Equipment Affected	Section	Issue	Proposed Resolution	Comments
Diesel Fired Engines	3.2	The recently finalized MACT for Reciprocating Internal Combustion Engines (RICE) – 40 CFR 63 Subpart ZZZZ applies to the operation of the emergency standby and firewater pump engines.	<p>Include a discussion regarding the applicability of this regulation based on LFC’s designation as a “Major Source”.</p> <p>“The firewater and floodwater pump engines are considered <i>Existing Emergency Stationary RICE</i> at a Major Source of HAPs under 40 CFR 63 Subpart ZZZZ. These engines were not subject to any initial compliance determinations or notifications. In addition no operating limits, fuel requirements, or performance tests are required. These engines are subject to the work, operation, and management practice items defined in Tables 2c and 6 of the regulation in addition to recordkeeping and reporting requirements. Implementation of these requirements is due by May 3, 2013.”</p>	

**RE-EVALUATION COMMENTS ON PTO/Part 70 PERMIT NO. 5651
EXXONMOBIL- SYU PROJECT
LAS FLORES CANYON (FID 1482)**

Equipment Affected	Section	Issue	Proposed Resolution	Comments
Crew and Supply Boats	3.3	The CARB Harbor Craft Regulation finalized since the time of the last reevaluation applies to the operation of the crew and supply boats in service to the platforms.	“Crew and Supply Boats operated in support of Exxon – SYU activities are subject to the fuel use, emission limits, monitoring, and recordkeeping requirements of the CARB Harbor Craft Regulation. This regulation defines emission standards by which all new or existing engines > 50 horsepower, operated for 300 hours/ year or more must comply with. New vessels brought into California must comply with the regulation immediately, while existing vessels are allowed a specified graced period to retrofit or replace the existing engines not meeting the EPA Tier 2 minimum emission standard.”	
CPP	4.2.2	The operating modes defined for the Cogeneration Power Plant have been revised per ATC 13545.	Please include the discussion on the Planned Bypass Mode as outlined in ATC 13545.	
	Tables 5.1-5.4	Update the Operating Scenario, Emission Factors, and Short Term and Long Term Emissions for the CPP to reflect the inclusion of the Planned Bypass Mode	See ATC 13545 for the necessary revisions.	
	6.1.2	The inclusion of the Planned Bypass Mode of operation for the CPP requires revision to the AQIA discussion on Production Impacts from Onshore Project Components	See ATC 13545 for the necessary revisions.	

**RE-EVALUATION COMMENTS ON PTO/Part 70 PERMIT NO. 5651
EXXONMOBIL- SYU PROJECT
LAS FLORES CANYON (FID 1482)**

Equipment Affected	Section	Issue	Proposed Resolution	Comments
	7.3.1	The discussion on offsets currently refers to Table 5.2, which is the emission factor table; please revise.	Table 5.10 (Facility Net Emissions Increase) should be referenced.	
CPP	9.C.1	The condition pertaining to the Cogeneration Power Plant should be revised to reflect the inclusion of the Planned Bypass Mode.	See ATC 13545 for the necessary revisions.	
Thermal Oxidizer	9.C.2 (b)(v)	Per MIN # 9755, ExxonMobil is required to address the issue of ammonia combustion in the thermal oxidizer during the annual calibration of the ammonia tank level transmitter.	Include a reference to the annual calibration of the ammonia tank level transmitter as one of the approved operations in which ammonia may be combusted in the thermal oxidizer. In addition, specify that emissions due to the calibration procedure are assumed to be 0.01 lb/year of ammonia. Emissions associated with this procedure were originally included under the Miscellaneous Flaring category for LFC. No change in emissions is required.	
	9.C.2(d)(iii)	Per MIN #9755 ExxonMobil is required to address the issue of ammonia combustion in the thermal oxidizer during the annual calibration of the ammonia tank level transmitter.	Revise the ammonia tank loading operations log reporting requirement to include the annual calibration of the ammonia tank level transmitter.	

**RE-EVALUATION COMMENTS ON PTO/Part 70 PERMIT NO. 5651
EXXONMOBIL- SYU PROJECT
LAS FLORES CANYON (FID 1482)**

Equipment Affected	Section	Issue	Proposed Resolution	Comments
Crew Boats	9.C.4 (a)(i)	All crew boat main and auxiliary engines have been replaced with Tier II engines the same as on the M/V Broadbill. An annual test specifically on the M/V Broadbill is not necessary.	Revise (a)(i) to state that “Controlled emissions of NOx from the diesel fired main propulsion engines and auxiliary engines on all crew boats shall meet an EPA Tier II level or better. Compliance shall be based on source testing of the main and auxiliary engines on one crew boat per year.”	
Crew Boats	9.C.4 (b)(iii)	All DPV crew boat main and auxiliary engines have been replaced with Tier II engines as such the requirement to use the M/V Broadbill at least 40% of the time is not necessary.	Propose that condition (b)(iii) be removed.	
Crew and Supply Boats	9.C.4(b)(ix)	New vessels compliant with the Harbor Craft Regulation should not have to perform additional initial source tests prior to being approved for use as a dedicated new/replacement boat since vessel operators have already made a demonstration of compliance.	Revise 9.C.4(b)(xi) to state that “Prior to bringing a boat into service whose engines have not yet been retrofit to the CARB Harbor Craft Regulation standards, ExxonMobil shall submit the information listed below to the APCD for such new/replacement crew and supply boats meeting the requirements set forth in (1) – (3) above. For boats that have been retrofit to meet the CARB Harbor Craft Regulation standards or for spot charters, this information shall be submitted within thirty (30) calendars days after the boat is first brought into service. ExxonMobil shall notify the APCD Project Manager (via fax or e-mail) within three (3) calendar days after a new spot charter or CARB Harbor Craft compliant boat is brought into operation.”	

**RE-EVALUATION COMMENTS ON PTO/Part 70 PERMIT NO. 5651
EXXONMOBIL- SYU PROJECT
LAS FLORES CANYON (FID 1482)**

Equipment Affected	Section	Issue	Proposed Resolution	Comments
Emergency Diesel Fired Engines	9.C.10	Condition 9.C.29 describes the recordkeeping requirements for the emergency firewater and floodwater pump engines per Rule 333, however there is no corresponding reporting condition in the Semi-Annual Compliance Verification Report condition, 9.C.10.	Request that a section be added to 9.C.10 specifically identifying the reporting requirements associated with the emergency engines per Rule 333 recordkeeping. Note that this condition should also reflect the reporting requirements of the ATCM per Condition 9.D.1 which requires an annual report of operations as described in the ATCM.	
SRU/WGI	9.C.10 (h)(i)	This condition pertaining to the Compliance Verification Report submittals requires the identification of the five highest hourly heat input rates per month from the SRU/WGI in addition to the daily heat input rates.	Request that the report of the five highest hourly heat input rates per month be omitted.	
Source Testing	9.C.12(b)	The source testing condition requires that ExxonMobil submit a source test plan for approval prior to initiating a source test. If there have been no modifications to the equipment requiring a source test, a new plan should not be necessary.	Request that this condition be revised to specify that a source test plan be submitted for approval for new equipment, or modifications to existing equipment. Otherwise, existing unmodified equipment will be source tested based on the existing approved source test plan. ExxonMobil will still notify the APCD at least 10 calendar days prior to source testing as is currently described in the condition.	

**RE-EVALUATION COMMENTS ON PTO/Part 70 PERMIT NO. 5651
EXXONMOBIL- SYU PROJECT
LAS FLORES CANYON (FID 1482)**

Equipment Affected	Section	Issue	Proposed Resolution	Comments
Emergency Diesel Fired Engines	9.C.29 (b) and (c)	The recordkeeping and reporting sections refer to Rule 333.H. This reference is incorrect.	Change reference to Rule 333.J consistent with the current version of the rule.	
Documents Incorporated by Reference	9.C.36	The APCD approved an alternative Degassing Plan on 7/1/2009 which is not listed in the permit.	Please include a reference to the 7/1/2009 approved Alternative Degassing Plan for degassing the Rune Tank (ABJ-1401A) at LFC.	
Offshore Operations	9.C.37	This condition requires a record of OCS operations submitted 60 days after the end of the 2 nd and 4 th quarters. This information is already being submitted in the Part 70 Semi Annual Compliance Verification Reports for the OCS.	Request that this condition be removed from LFC's permit as the data required is already being submitted semi-annually in the CVRs.	
Emergency Diesel Fired Engines	9.D.1.(e)	The APCD only condition pertaining to the diesel fired engines requires a separate written report of engine operations per the ATCM.	Request that this condition be revised to allow for this information to be submitted as part of the semi-annual compliance verification report submitted March 1 st instead of as a separate document submittal.	
General Comment		The Minerals Management Service (MMS) has been changed to the Bureau of Ocean Energy Management (OEM)	Please change all "MMS" references to "OEM".	

STATIONARY SOURCE SUMMARY (Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District

COMPANY NAME: ExxonMobil Production Company

➤ APCD USE ONLY ◀

Application #:

Application Filing Fee*:

APCD IDS Processing ID:

Date Application Received:

Date Application Deemed Complete:

I. SOURCE IDENTIFICATION

1. Source Name: Exxon - Santa Ynez Unit
2. Four digit SIC Code: 1311 USEPA AIRS Plant ID (for APCD use only): 8009, 8018, 8019
3. Parent Company (if different than Source Name): ExxonMobil Production Company
4. Mailing Address of Responsible Official: P.O. Box 4358, Houston, TX 77210
5. Street Address of Source Location (include Zip Code): 12000 Calle Real, Goleta, CA 93117
6. UTM Coordinates (if required) (see instructions):
7. Source located within: 50 miles of the state line Yes No
50 miles of a Native American Nation Yes No Not Applicable
8. Type of Organization: Corporation Sole Ownership Government Partnership Utility Company
9. Legal Owner's Name: ExxonMobil Production Company
10. Owner's Agent Name (if any): NA Title: Telephone #:
11. Responsible Official: Troy M. Tranquada Title: California Operations Superintendent Telephone #: (805)-961-4078
12. Plant Site Manager/Contact: Troy M. Tranquada Title: California Operations Superintendent Telephone #: (805)-961-4078
13. Type of facility: Oil and Gas Processing Facility
14. General description of processes/products: See Section 2 of Part 70 9100, 9101 and 9102
15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see Attachment A)? Yes No
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required? Not Applicable Yes No
(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.) *Verification regarding this submittal has already been submitted to the District.*

* Applications submitted without a filing fee will be returned to the applicant immediately as "improper" submittals

EXEMPT EMISSIONS UNITS (Form 1302-H)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: ExxonMobil Production Company	SOURCE NAME: Exxon - SYU

Are you claiming any emitting activities to be insignificant? (See definition at bottom of page)

YES NO

I. ACTIVITIES CLAIMED TO BE INSIGNIFICANT (Attach supporting calculations)

Activity	Description of Activity/Emission Units	Potential to Emit for each Pollutant
	See existing insignificant activity list/discussion in current permit. Table 5.7 of PTO 9100 – Estimated Exempt Emissions	
	See existing insignificant activity list/discussion in current permit. Table 5.7 of PTO 9101 – Estimated Exempt Emissions	
	See existing insignificant activity list/discussion in current permit. Table 5.7 of PTO 9102 – Estimated Exempt Emissions	

Insignificant activities are defined in APCD Rule 1301 (definitions). For an activity to be considered insignificant emissions cannot exceed 2 tons per year potential to emit (PTE) any criteria pollutants, and 0.5 tons per year for any regulated HAP.

Note: Insignificant activities are not exempt from Part 70 requirements/permits.

COMPLIANCE PLAN (Form 1302-I1)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: ExxonMobil Production Company	SOURCE NAME: Exxon - SYU

I. PROCEDURE FOR USING FORM 1302-I

☞ This form shall be submitted as part of the SBCAPCD's Regulation XIII Application. The Responsible Official shall identify the applicable federal requirement(s) to which the source is subject. In the Compliance Plan (Form 1302-I), a Responsible Official shall identify whether the source identified in the SBCAPCD's Regulation XIII Application currently operates in compliance with all applicable federal requirements.

II. APPLICABLE FEDERAL REQUIREMENTS

Applicable Federal Requirement ¹	Affected Emission Unit	In compliance? (yes/no/exempt ³)	Effective Date ⁴
Regulatory Reference ²	Regulation Title ²		
40 CFR Part 63 Subpart ZZZZ	NESHAP for Stationary Reciprocating Internal Combustion Engines	Yes	03/09/2011
40 CFR 60 Subpart IIII	NSPS for Stationary Compression Ignition Engines	Yes	7/11/2006

1 Review APCD SIP Rules, NSPS, NESHAPS, and MACTs .
 2 Regulatory Reference is the abbreviated citation (e.g. 40 CFR 60 Subpart OOO, APCD Rule 325.H) and Title is the prosaic title (e.g. NSPS Standards of Performance for Nonmetallic Mineral Processing Plants, Crude Oil Production and Separation, Inspection)
 3 If exempt from applicable federal requirement, include explanation for exemption.
 4 Indicate the date during the permit term that the applicable federal requirement will become effective for the emission unit.

Other Applicable Federal Requirements ⁵	Affected Emission Unit	In compliance?	Effective Date
ATC12682 Mod – 01	Fugitive components and water surge vessel	Yes	08/02/2010
ATC/PTO 13489, 13490	Fugitive components	Yes	08/15/2011
ATC/PTO 13491	Fugitive components	Yes	TBD - 2011
ATC/PTO 13732	Drilling Tank	Yes	11/10/2011
Adm/Part 70 13744, 13745, and 13746	Responsible Official Designation	Yes	2011

5 All environmentally significant permit conditions -- such as emission, operation, and throughput limitations or compliance monitoring conditions associated with such limitations -- listed in all authority to construct (ATC) permits issued to the Part 70 source are also applicable requirements.

*** If more than one page is used, please ensure that "Santa Barbara APCD", stationary source name and "Form 1302-I1" appear on each page. ***

COMPLIANCE PLAN (Form 1302-I2)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: ExxonMobil Production Company	SOURCE NAME: Exxon - SYU

III. COMPLIANCE CERTIFICATION

Under penalty of perjury, I certify the following:

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) with which the source is in compliance identified in form 1302-I1;**
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with the future-effective applicable federal requirement(s) identified in form 1302-I1, on a timely basis¹;**
- Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance with the applicable federal requirement(s), identified in form 1302-I1, and I have attached a compliance plan schedule.²**



 Signature of Responsible Official



 Date

1. Unless a more detailed schedule is expressly required by the applicable federal requirement.
2. At the time of expected permit issuance, if the source expects to be out of compliance with an applicable federal requirement, the applicant is required to provide a compliance schedule with this application, with the following exception. A source which is operating under a variance that is effective for less than 90 days need not submit a Compliance Schedule. For sources operating under a variance, which is in effect for more than 90 days, the Compliance Schedule is the schedule that was approved as part of the variance granted by the hearing board.

The compliance schedule shall contain a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with this applicable federal requirement. For sources operating under a variance, the compliance schedule is part of the variance granted by the hearing board. The compliance schedule shall resemble, and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. For sources not operating under a variance, consult the Air Pollution Control Officer regarding procedures for obtaining a compliance schedule.

CERTIFICATION STATEMENT (Form 1302-M)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY <
COMPANY NAME: ExxonMobil Production Company	APCD IDS PROCESSING ID: SOURCE NAME: Exxon - SYU

Identify, by checking off below, the forms and attachments that are part of your application. If the application contains forms or attachments that are not identified below, please identify these attachments in the blank space provided below. Review the instructions if you are unsure of the forms and attachments that need to be included in a complete application.

Forms included with application

Stationary Source Summary Form
 Total Stationary Source Emission For
 Compliance Plan Form
 Compliance Plan Certification Form
 Exempt Equipment Form
 Certification Statement Form

List other forms or attachments

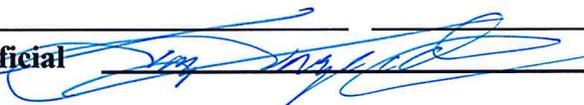
[] check here if additional forms listed on back

Attachments included with application

Description of Operating Scenarios
 Sample emission calculations
 Fugitive emission estimates
 List of Applicable requirements
 Discussion of units out of compliance with applicable federal requirements and, if required, submit a schedule of Compliance
 Facility schematic showing emission points
 NSR Permit
 PSD Permit
 Compliance Assurance monitoring protocols
 Risk management verification per 112(r)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in SBCAPCD's Regulation XIII, Rule 1301 or USEPA's 40 CFR Part 70.

Signature of Responsible Official  **Date** 12/8/4

Print Name of Responsible Official: Troy M. Tranquada

Title of Responsible Official and Company Name: California Operations Superintendent
ExxonMobil Production Company

**CERTIFICATION STATEMENT
(Form 1302-M continued)**

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS PROCESSING ID:
COMPANY NAME: ExxonMobil Production Company	SOURCE NAME: Exxon - SYU

List Other Forms or Attachments (cont.)

Reevaluation Comment Table on PTO 9100, 9101, and 9102 and Part 70 Operating Permit
9100, 9101, and 9102

**RE-EVALUATION COMMENTS ON PTO/Part 70 9100, 9101, 9102
EXXONMOBIL- SYU PROJECT
PLATFORMS HONDO, HARMONY, AND HERITAGE (FIDs 8009, 8018, and 8019)**

The table below lists ExxonMobil's issues and proposed resolution for specific items in the OCS permits.

Equipment Affected	Facility	Section	Issue	Proposed Resolution	Comments
Permit History	HE, HA, HO	1.2.2	Update facility permitting history.	Include: <ul style="list-style-type: none"> • ATC/PTO 13489, 13490, and 13491 • Adm/Part 70 13744, 13745, and 13746 • (HA) ATC 12682 -01, and PTO 12682 • (HO) ATC/PTO 13732 • (HE) ATC/PTO 13696 	
Responsible Official	HE, HA, HO	1.6.9	Update responsible official designation	See Adm/Part 70 – 13744, 13745, and 13746 identifying Troy M. Tranquada as the responsible official.	
Fugitive Components	HE, HA, HO	3.1	Update Rule 202 – De Minimis subtotal.	See the Semi-Annual Compliance Verification Report submitted September 1, 2011 for the latest update.	Confirm status of OCS de minimis permits - ATC/PTO 13491 has not been issued final yet.

**RE-EVALUATION COMMENTS ON PTO/Part 70 9100, 9101, 9102
EXXONMOBIL- SYU PROJECT
PLATFORMS HONDO, HARMONY, AND HERITAGE (FIDs 8009, 8018, and 8019)**

Equipment Affected	Facility	Section	Issue	Proposed Resolution	Comments
Emergency Diesel Engines	HE, HA, HO	3.2	The recently finalized MACT for Reciprocating Internal Combustion Engines (RICE) – 40 CFR 63 Subpart ZZZZ applies to the operation of the emergency standby and firewater pump engines operated on all of the platforms.	<p>Include a discussion regarding the applicability of this regulation to these engines.</p> <p>“The emergency generator engines are considered <i>Existing Emergency Stationary RICE</i> at an Area Source of HAPs under 40 CFR 63 Subpart ZZZZ. These engines were not subject to any initial compliance determinations or notifications. In addition no operating limits, fuel requirements, or performance tests are required. These engines are subject to the work, operation, and management practice items defined in Tables 2d and 6 of the regulation in addition to recordkeeping and reporting requirements. Implementation of these requirements is due by May 3, 2013.”</p>	
Drilling Engines	HE	3.2	The recently finalized MACT for Reciprocating Internal Combustion Engines (RICE) – 40 CFR 63 Subpart ZZZZ applies to the operation of the B & C Side Cement Pumps, and the Cuttings Reinjection Pump engines operated on Platform Heritage.	<p>Include a discussion regarding the applicability of the MACT to these engines.</p> <p>“The B & C Side Cement Pumps, and the Cuttings Reinjection Pump engines are considered <i>New Non-Emergency Stationary RICE</i> at an Area Source of HAPs under 40 CFR 63 Subpart ZZZZ. Compliance with this subpart is demonstrated through compliance with 40 CFR 60 Subpart III.”</p>	

**RE-EVALUATION COMMENTS ON PTO/Part 70 9100, 9101, 9102
EXXONMOBIL- SYU PROJECT
PLATFORMS HONDO, HARMONY, AND HERITAGE (FIDs 8009, 8018, and 8019)**

Equipment Affected	Facility	Section	Issue	Proposed Resolution	Comments
Drilling Engines	HE	3.2	<p>The B & C Side Cement Pumps, and the Cuttings Reinjection Pump engines operated on Platform Heritage were installed after the April 1, 2006 applicability date defined by the NSPS standard for Stationary Compression Ignition Engines (40 CFR 60 Subpart III).</p> <p>The existing permit does not identify the NSPS as an applicable regulation; however the engines installed are operated in compliance with Subpart III.</p>	<p>Include a discussion regarding the applicability of the NSPS to these engines.</p> <p>“The B & C Side Cement Pumps, and the Cuttings Reinjection Pump engines were installed after April 1, 2006, as such these engines are subject to the NSPS standard for Stationary Compression Ignition Engines (40 CFR 60 Subpart III).”</p>	
Diesel Engines	HO	3.2	<p>The recently finalized MACT for Reciprocating Internal Combustion Engines (RICE) – 40 CFR 63 Subpart ZZZZ applies to the operation of the East and West Cranes at Platform Hondo.</p>	<p>Include a discussion regarding the applicability of this regulation to these engines operated at Platform Hondo.</p> <p>“The crane engines are considered <i>Existing Non-Emergency Stationary RICE</i> at an Area Source of HAPs under 40 CFR 63 Subpart ZZZZ. These engines were not subject to any initial compliance determinations or notifications. In addition no operating limits, fuel requirements, or performance tests are required. These engines are subject to the work, operation, and management practice items defined in Tables 2d and 6 of the regulation in addition to recordkeeping and reporting requirements. Implementation of these requirements is due by May 3, 2013.”</p>	

**RE-EVALUATION COMMENTS ON PTO/Part 70 9100, 9101, 9102
EXXONMOBIL- SYU PROJECT
PLATFORMS HONDO, HARMONY, AND HERITAGE (FIDs 8009, 8018, and 8019)**

Equipment Affected	Facility	Section	Issue	Proposed Resolution	Comments
Diesel Engines	HA, HE	3.2	The recently finalized MACT for Reciprocating Internal Combustion Engines (RICE) – 40 CFR 63 Subpart ZZZZ applies to the operation of the East Cranes at Platforms Harmony and Heritage.	<p>Include a discussion regarding the applicability of this regulation to these engines operated at Platforms Harmony and Heritage.</p> <p>“The East Crane engines are considered <i>Existing Non-Emergency Stationary RICE</i> at an Area Source of HAPs under 40 CFR 63 Subpart ZZZZ. These engines are required to reduce emissions of CO or formaldehyde as described in Tables 4 and 5 of the regulation. In addition these engines must meet operational and maintenance requirements, fuel requirements, and conduct periodic performance tests to show compliance with the emission limits. Implementation of these requirements is due by May 3, 2013.”</p>	
Specialty Equipment	HE, HA, HO	4.2.1	The recent revisions to Rule 202 include provisions for “specialty equipment” used offshore. This section of the permit makes reference to temporary equipment potentially allowed for use offshore but does not reflect the rule revision.	Included a discussion in this section or in Section 3 regarding the potential use of specialty equipment.	

**RE-EVALUATION COMMENTS ON PTO/Part 70 9100, 9101, 9102
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Equipment Affected	Facility	Section	Issue	Proposed Resolution	Comments
Crew and Supply Boats	HE, HA, HO	3.3	The CARB Harbor Craft Regulation finalized since the time of the last reevaluation applies to the operation of the crew and supply boats in service to the platforms.	“Crew and Supply Boats operated in support of Exxon – SYU activities are subject to the fuel use, emission limits, monitoring, and recordkeeping requirements of the CARB Harbor Craft Regulation. This regulation defines emission standards by which all new or existing engines > 50 horsepower, operated for 300 hours/ year or more must comply with. New vessels brought into California must comply with the regulation immediately, while existing vessels are allowed a specified graced period to retrofit or replace the existing engines not meeting the EPA Tier 2 minimum emission standard.”	
Central Process Heater	HA	9.C.3(c)(i)	Frequency of produced gas sampling	Request that quarterly sampling be reduced to semi-annual sampling.	
H₂S Analyzers	HA, HE	Fuel Gas Sulfur Reporting Plan – CGA Audit	The quarterly CGA audit of the H ₂ S analyzers required under the Fuel Gas Sulfur Reporting Plan require that the reports be submitted no later than 10 working days after the completion of the audit.	Request that the results of the quarterly CGA audit be submitted semi-annually as part of the various process monitor analyses submitted under 9.C.10 (i)(iv).	
Crew Boats	HO, HA, HE	9.C.4 and 9.C.5 (a)	All crew boat main and auxiliary engines have been replaced with Tier II engines the same as on the M/V Broadbill. An annual test specifically on the M/V Broadbill is not necessary.	Revise (a)(i) to state that “Controlled emissions of NO _x from the diesel fired main propulsion engines and auxiliary engines on all crew boats shall meet an EPA Tier II level or better. Compliance shall be based on source testing of the main and auxiliary engines on one crew boat per year.”	

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Equipment Affected	Facility	Section	Issue	Proposed Resolution	Comments
Crew Boats	HO, HA, HE	9.C.4 and 9.C.5 (b)(iii)	All DPV crew boat main and auxiliary engines have been replaced with Tier II engines as such the requirement to use the M/V Broadbill at least 40% of the time is not necessary.	Propose that condition (b)(iii) be removed.	
Crew and Supply Boats	HO, HA, HE	9.C.4 and 9.C.5 (b)(x)	New/replacement boats compliant with the Harbor Craft Regulation should not have to perform additional initial source tests prior to being approved for use as a dedicated new/replacement boat since vessel operators have already made a demonstration of compliance.	Revise 9.C.4(b)(x)(5) to state that “ExxonMobil shall submit documentation that the New/Replacement boat is certified in compliance with the CARB Harbor Craft Regulation prior to bringing it into service. For vessels not yet retrofit to meet the CARB Harbor Craft Regulation, ExxonMobil must first revise the Boat Monitoring and Reporting Plan and obtain APCD approval prior to bringing the New/Replacement boat into service, except for spot charters. ExxonMobil shall revise and resubmit the boat plan within thirty (30) calendar days after any spot charter or CARB Harbor Craft Regulation compliant vessel is brought into service.”	

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Equipment Affected	Facility	Section	Issue	Proposed Resolution	Comments
Crew and Supply Boats	HO, HA, HE	9.C.4(b)(xi)	New/replacement boats compliant with the Harbor Craft Regulation should not have to perform additional initial source tests prior to being approved for use as a dedicated new/replacement boat since vessel operators have already made a demonstration of compliance.	Revise 9.C.4(b)(xi) to state that “Prior to bringing a boat into service whose engines have not yet been retrofit to the CARB Harbor Craft Regulation standards, ExxonMobil shall submit the information listed below to the APCD for such new/replacement crew and supply boats meeting the requirements set forth in (1) – (3) above. For boats that have been retrofit to meet the CARB Harbor Craft Regulation standards or for spot charters, this information shall be submitted within thirty (30) calendars days after the boat is first brought into service. ExxonMobil shall notify the APCD Project Manager (via fax or e-mail) within three (3) calendar days after a new spot charter or CARB Harbor Craft compliant boat is brought into operation.”	
Water Surge Vessel	HA	9.C.7	A water surge vessel was permitted for construction and operation per ATC 12682 and ATC 12682-01.	Incorporate the water surge vessel permitted under ATC 12682 and ATC 12682 – 01.	
Emergency Generators and Firewater Pump Engines	HO, HA, HE	9.C.9(a) (ii) – (iv) (HO) 9.C.10(a)(ii) – (iv) (HA, HE)	These conditions require a separate log/CVR reporting section for each type of engine use. The information can easily be presented in one log for each engine.	Combine conditions (ii) – (iv), to require a record of emergency use, maintenance & testing, and all other uses be reported in a single log for each emergency generator and firewater pump engine.	

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Equipment Affected	Facility	Section	Issue	Proposed Resolution	Comments
Crew and Supply Boats	HO, HA, HE	9.C.9(d) (vii) and Boat Plan – Section 8	The data identified in the Boat Plan for submission in the semi-annual Compliance Verification Report represents a significant fraction of the CVR yet it does not provide an additional measure of assurance of compliance beyond the data already submitted per 9.C.9 (HO) and 9.C.10 (HA, HE) for the crew and supply boats.	<p>Propose that the boat plan be revised such that the information currently submitted in the CVR still be recorded and maintained on site for APCD inspection, but that it not be required for submission in the CVR.</p> <p>Remove condition 9.C.9 (d) (vii) (HO) requiring a report of the data specified in the Boat Plan. Replace with the following:</p> <p>“Monthly spot charter fuel use for crew and supply boat main engines for each platform. The annual total fuel use for spot charters shall be compared against the total DPV main engine fuel use to demonstrate compliance with the 10% limit.”</p>	
Flare	HO, HA, HE	9.C.9(b)(ii) (HO) 9.C.10(c)(ii) (HA, HE)	The record of planned infrequent flaring events that exceed for events per year is included in section (b)(ii) in addition to section (b)(vi) of the CVR.	<p>Request that Section (b)(ii) be removed as section (b)(vi) is a more comprehensive record of flaring activities including the required record of planned infrequent events. Revise (b)(vi) using consistent language between the LFC, POPCO, and OCS permits.</p> <p>This is consistent with the recordkeeping/reporting requirement for LFC flaring.</p>	

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Equipment Affected	Facility	Section	Issue	Proposed Resolution	Comments
Fugitive Hydrocarbon Components	HO, HA, HE	9.C.9(c)(iii) (HO) 9.C.10(d)(iii) (HA, HE)	This condition requires a record of leaking components and associated repair actions the same as condition (ii) of this section.	Remove condition 9.C.9(c)(iii) from Hondo's permit and 9.C.10(d)(iii) from Harmony and Heritage's permits.	
Process Stream Analysis	HO, HA, HE	9.C.9 (f)(ii) (HO) 9.C.10(g)(ii) (HA, HE)	The condition requires the process stream analyses data per the Process Stream Analysis permit condition, the same as is required again in the General Reporting Requirements section of the CVR (h)(iv) – Hondo and (i)(iv) – Harmony and Heritage.	Remove condition 9.C.9 (f)(ii) from Hondo's permit and 9.C.10(g)(ii) from Harmony and Heritage's permits.	
Source Testing	HO, HA, HE	9.C.11(b) (HO) 9.C.12 (b) (HA, HE)	The source testing condition requires that ExxonMobil submit a source test plan for approval prior to initiating a source test. If there have been no modifications to the equipment requiring a source test, a new plan should not be necessary.	Request that this condition be revised to specify that a source test plan be submitted for approval for new equipment, or modifications to existing equipment. Otherwise, existing unmodified equipment will be source tested based on the existing approved source test plan. ExxonMobil will still notify the APCD at least 10 calendar days prior to source testing as is currently described in the condition.	
Equipment List	HO, HA, HE	NA	The equipment lists included as part of the 2009 reevaluation have errors in such as exemptions identified, hours of operation allowed, and missing manufacturer details	Request that the equipment lists be corrected and completed before they are included again as part of the reevaluation permit.	

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Equipment Affected	Facility	Section	Issue	Proposed Resolution	Comments
General Comment	HA	9.C	Noted issues with condition numbering. Numbers are skipped or repeated as follows: Harmony: 9.C.2 is omitted, 9.C.6 is duplicated	Please correct condition numbering.	
General Comment	HO, HA, HE		The Minerals Management Service (MMS) has been changed to the Bureau of Ocean Energy Management (OEM)	Please change all "MMS" references to "OEM".	