



Santa Barbara County
Air Pollution Control District

NOV 14 2011

Mr. Gerardo Rios
USEPA – Permits Office (AIR 3)
75 Hawthorne Street
San Francisco, CA 94105

FID: 08019
Permit: AP 13696
SSID: 01482

Re: Proposed Minor Permit Modifications to ExxonMobil Production Company's Platform Heritage
Part 70/APCD PTO 9102-R4

Dear Mr. Rios:

This letter transmits Proposed Minor Permit Modification Permit to Operate (PTO) 13696 for modifications to Part 70/APCD PTO 9102-R4. Included with the proposed permit is a copy of the application submitted by the applicant for this modification. We plan to issue this minor permit modification as final after December 17, 2011 provided your office has not objected to such issuance during this time interval.

If you have any questions, please contact Ben Ellenberger of my staff at (805) 961-8879.

Sincerely,

Michael Goldman, Manager
Engineering & Compliance Division

enc: Proposed PTO 13696
Application forms for Minor Modifications to ExxonMobil Production Company's Platform Heritage

cc: Platform Heritage 08019 Project File SC
ECD Chron File



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EQUIPMENT OWNER/OPERATOR:

ExxonMobil Production Company

205618

EQUIPMENT LOCATION:

Parcel OCS P-0182, Goleta

STATIONARY SOURCE/FACILITY:

Exxon SYU Project
Platform Heritage

SSID: 01482
FID: 08019

EQUIPMENT DESCRIPTION:

The temporary pipeline span remediation maintenance equipment is listed in Table 6 and addressed in Sections 2.1 and 2.2 of the Permit Evaluation.

PROJECT/PROCESS DESCRIPTION:

The operator will temporarily use a special vessel, the *MSV Intrepid*, along with other support equipment to install supports on and under pipelines from Platforms Hondo and Harmony to the onshore treatment facility at Las Flores Canyon. This remediation work will occur in a high current area near the State Waters three-mile line in order to significantly reduce free span lengths. This pipeline span remediation maintenance activity is expected to take less than one week to complete. The pipeline span remediation maintenance activity is being exempted from the New Source Review provisions of Regulation VIII under the provisions of the exemption for marine vessel engines associated with maintenance in District Rule 202.F.8. This permit is necessary to restrict the potential to emit from the pipeline span remediation maintenance engines to less than ten (10) tons per year of pollutant emissions.

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CONDITIONS:

This section lists the applicable permit conditions for the pipeline span remediation maintenance activities between Platforms Hondo and Harmony and the onshore processing facility at Las Flores Canyon. Section A lists the standard administrative conditions. Section B lists 'generic' permit conditions, including emission standards, for all equipment in this permit. Section C lists conditions affecting specific equipment.

Conditions listed in Sections A, B, and C are enforceable by the USEPA, the District, the State of California and the public. Conditions listed in Section D are enforceable only by the District and the State of California. Where any reference contained in Sections 9.A, 9.B, or 9.C refers to any other part of this permit that part of the permit referred to is federally enforceable.

9.A Standard Administrative Conditions

The following federally enforceable administrative permit conditions apply to the pipeline span remediation activities. In the case of a discrepancy between the wording of a condition and the applicable District rule, the wording of the rule shall control.

- A.1 **Condition Acceptance.** Acceptance of this operating permit by ExxonMobil shall be considered as acceptance of all terms, conditions, and limits of this permit.
- A.2 **Grounds for Revocation.** Failure to abide by and faithfully comply with this permit or any Rule, Order, or Regulation may constitute grounds for revocation pursuant to California Health & Safety Code Section 42307 *et seq.*
- A.3 **Indemnity and Separation Clauses.** The Applicant shall defend, indemnify and hold harmless the District or its agents, officers and employees from any claim, action or proceeding against the District or its agents, officers or employees, to attack, set aside, void, or annul, in whole or in part, the approval granted herein. In the event that the District fails promptly to notify the Applicant of any such claim, action or proceeding, or that the District fails to cooperate fully in the defense of said claim, this condition shall thereafter be of no force or effect. In the event that any condition contained herein is determined to be invalid, then all remaining conditions shall remain in force.
- A.4 **Reimbursement of Costs.** All reasonable expenses, as defined in District Rule 210, incurred by the District, District contractors, and legal counsel for all activities that follow the issuance of this PTO, including but not limited to permit condition implementation, implementation of Regulation XIII (*Part 70 Operating Permits*), compliance verification and emergency response, directly and necessarily related to enforcement of the permit shall be reimbursed by ExxonMobil as required by Rule 210. [*Re: District Rule 210*]

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- A.5 **Access to Records and Facilities.** As to any condition that requires for its effective enforcement the inspection of records or facilities by the District or its agents, ExxonMobil shall make such records available or provide access to such facilities upon notice from the District. Access shall mean access consistent with California Health and Safety Code Section 41510 and Clean Air Act Section 114A.
- A.6 **Compliance.** Nothing contained within this permit shall be construed to allow the violation of any local, State or Federal rule, regulation, ambient air quality standard or air quality increment.
- A.7 **Consistency with Analysis.** Operation under this permit shall be conducted consistent with all data, specifications and assumptions included with the application and supplements thereof (as documented in the District's project file) and the District's analyses under which this permit is issued as documented in the Permit Analyses prepared for and issued with the permit.
- A.8 **Compliance with Permit Conditions.**
- (a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and 9.C.
 - (b) This permit does not convey property rights or exclusive privilege of any sort.
 - (c) Any permit noncompliance with sections 9.A, 9.B, or 9.C constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
 - (d) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
 - (e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.
 - (f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:
 - (1) Compliance with the permit, or
 - (2) Whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action.
 - (g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail to the extent feasible. [*Re: 40 CFR Part 70.6.(a)(6), District Rules 1303.D.1*]

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- A.9 **Emergency Provisions.** The permittee shall comply with the requirements of the District, Rule 505 (Upset/Breakdown rule) and/or District Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the District, in writing, a “notice of emergency” within 2 working days of the emergency. The “notice of emergency” shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [*Re: 40 CFR 70.6(g), District Rule 1303.F*]
- A.10 **Compliance Plans.**
- (a) The permittee shall comply with all federally enforceable requirements that become applicable during the permit term in a timely manner.
 - (b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards. [*Re: District Rule 1302.D.2*]
- A.11 **Right of Entry.** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 Source is located or where records must be kept:
- (a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;
 - (b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;
 - (c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times. Monitoring of emissions can include source testing. [*Re: District Rule 1303.D.2*]
- A.12 **Payment of Fees.** The permittee shall reimburse the District for all its Part 70 permit processing and compliance expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the District and the USEPA pursuant to section 502(a) of the Clean Air Act. [*Re: District Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6(a)(7)*]
- A.13 **Prompt Reporting of Deviations.** The permittee shall submit a written report to the District documenting each and every deviation from the requirements of this permit or any applicable federal requirements within 7 days after discovery of the violation, but not later than 6 months after the date of occurrence. The report shall clearly document:
- (a) The probable cause and extent of the deviation,
 - (b) Equipment involved,
 - (c) The quantity of excess pollutant emissions, if any, and

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- (d) Actions taken to correct the deviation.

The requirements of this condition shall not apply to deviations reported to District in accordance with Rule 505. Breakdown Conditions, or Rule 1303.F Emergency Provisions. [*District Rule 1303.D.1, 40 CFR 70.6(a) (3)*]

- A.14 **Reporting Requirements/Compliance Certification.** The permittee shall submit compliance certification reports to the USEPA and the Control Officer every six months. These reports shall be submitted on District approved forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1st and March 1st, respectively, each year. Supporting monitoring data shall be submitted in accordance with the "Semi-Annual Compliance Verification Report" condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [*Re: District Rules 1303.D.1, 1302.D.3, 1303.2.c*]
- A.15 **Federally Enforceable Conditions.** Each federally enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the District-only enforceable section of this permit are federally enforceable or subject to the public/USEPA review [*Re: CAAA, § 502(b)(6), 40 CFR 70.6(b)*]
- A.16 **Recordkeeping Requirements.** The permittee shall maintain records of required monitoring information that include the following:
- (a) The date, place as defined in the permit, and time of sampling or measurements;
 - (b) The date(s) analyses were performed;
 - (c) The company or entity that performed the analyses;
 - (d) The analytical techniques or methods used;
 - (e) The results of such analyses; and
 - (f) The operating conditions as existing at the time of sampling or measurement;
 - (g) The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by the permittee and shall be made available to the District upon request. [*Re: District Rule 1303.D.1.f, 40 CFR 70.6(a)(3)*]
- A.17 **Conditions for Permit Reopening.** The permit shall be reopened and revised for cause under any of the following circumstances:
- (a) Additional Requirements: If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18

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months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30 day notice of intent to reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.

- (b) Inaccurate Permit Provisions: If the District or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
- (c) Applicable Requirement: If the District or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
- (d) Administrative procedures to reopen a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which cause to reopen exists.
- (e) If a permit is reopened, the expiration date does not change. Thus, if the permit is reopened, and revised, then it will be reissued with the expiration date applicable to the re-opened permit. [*Re: 40 CFR 70.7(f), 40 CFR 70.6(a)*]

A.18 **Credible Evidence.** Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding. [*Re: 40 CFR 52.12(c)*]

9.B. Generic Conditions

The generic conditions listed below apply to all emission units, regardless of their category or emission rates. These conditions are federally enforceable. In the case of a discrepancy between the wording of a condition and the applicable District rule, the wording of the rule shall control.

B.1. **Circumvention (Rule 301).** A person shall not build, erect, install, or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26 (Air Resources) of the Health and Safety Code of the State of California or of these Rules and Regulations. This Rule shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code of the State of California, or of District Rule 303. [*Re: District Rule 301*]

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- B.2. **Visible Emissions (Rule 302).** ExxonMobil shall not discharge into the atmosphere from any single source of emission any air contaminants for a period or periods aggregating more than three minutes in any one hour which is:
- (a) As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
 - (b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection B.2.(a) above.
[Re: District Rule 302]
- B.3. **Nuisance (Rule 303).** No pollutant emissions from any source at ExxonMobil shall create nuisance conditions. No operations shall endanger health, safety or comfort, nor shall they damage any property or business. [Re: District Rule 303]
- B.4. **PM Concentration - South Zone (Rule 305).** ExxonMobil shall not discharge into the atmosphere, from any source, particulate matter in excess of the concentrations listed in Table 305(a) of Rule 305. [Re: District Rule 305]
- B.5. **Specific Contaminants (Rule 309).** ExxonMobil shall not discharge into the atmosphere from any single source sulfur compounds, hydrogen sulfide, combustion contaminants and carbon monoxide in excess of the standards listed in Sections A, B and G of Rule 309. ExxonMobil shall not discharge into the atmosphere from any fuel burning equipment unit, sulfur compounds, nitrogen oxides or combustion contaminants in excess of the standards listed in Section E and F of Rule 309. [Re: District Rule 309]
- B.6. **Sulfur Content of Fuels (Rule 311).** ExxonMobil shall not burn fuels with a sulfur content in excess of 0.5% (by weight) for liquid fuels and 239 ppmvd or 15 gr/100scf (calculated as H₂S) for gaseous fuels. Compliance with this condition shall be based on continuous monitoring of the fuel gas with H₂S and HHV analyzers, quarterly total sulfur content measurements of the fuel gas using ASTM or other District-approved methods and diesel fuel billing records or other data showing the certified sulfur content for each shipment. [Re: District Rule 311]

9.C Requirements and Equipment Specific Conditions

This section contains non-generic federally-enforceable conditions, including emissions and operations limits, monitoring, recordkeeping, and reporting for each specific equipment group. This section may also contain other non-generic conditions. The permit conditions below apply only to the pipeline span remediation activity.

- C.1 **Pipeline Span Remediation Activity Termination.** Pipeline span remediation activity termination is defined as the date the span remediation activity vessel leaves the California Coastal Waters adjacent to Santa Barbara County as defined in District Rule 102 after completion of all replacement work. ExxonMobil shall notify the District within 3-days after the repair activity termination date.

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- C.2 **Pipeline Span Remediation Activity Emissions Cap.** Actual emissions of NO_x from the span remediation activity engines listed in Tables 1-6 of this permit shall not exceed 10 tons during the duration of this repair activity. The duration of the repair activity shall not exceed 12 consecutive months.
- C.3 **Pipeline Span Remediation Activity Start-up Notification.** ExxonMobil shall notify the District within 2 days after the pipeline span remediation vessel has entered the California Coastal Waters adjacent to Santa Barbara County as defined in District Rule 102.
- C.4 **Operational Restrictions.**
- a. The Bow Anchor Winch as listed in Table 6 of this permit shall not be used.
 - b. At no time shall more than three of the *MSV Intrepid* Main engines operate at the same time, except for periods of no more than 15 minutes during warm-up of a fourth generator engine for the purpose of replacing an existing on-line generator.
 - c. The permittee may only add CARB Diesel to each IC engine or any fuel tank directly attached to each IC engine. Diesel fuel used by all IC engines shall have a sulfur content no greater than 0.0015 weight percent (15 ppmw).
 - d. Total pipeline span remediation fuel consumption shall not exceed 58,140 gallons of CARB ultra low sulfur Diesel..
 - e. *Specialty Equipment.* No equipment other than that listed in Table 6 shall be used for pipeline span remediation activities without a District permit; however, ExxonMobil may apply for exemption for specialty equipment under Rule 202.F.5.
- C.5 **Fuel Monitoring.** ExxonMobil shall implement fuel use monitoring in accordance with the *Fuel Measurement Plan – Santa Ynez Unit Pipeline Span Remediation Maintenance Activities – Revision 1* dated October 2011, and approved by the District on 10/27/2011.
- C.6 **Pipeline Span Remediation Activity Daily Report.** ExxonMobil shall record engine fuel use and project emissions on a daily basis. A fuel use and emissions report, including cumulative project and daily totals, shall be provided via e-mail to the District each day (attn: Ben Ellenberger) for the duration of the project. Emission calculations documentation for the daily reports shall be provided to the District upon request.
- C.7 **Pipeline Span Remediation Activity Completion Report.** Within 14-days after the repair activity termination, ExxonMobil shall submit a report to the District detailing the start and end dates of the repair activity, the volume of fuel consumed in each of the repair activity engines and the total emissions for the repair activity. The report shall include fuel purchase records or a written statement on the fuel supplier's letterhead signed by an authorized representative of the

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company confirming that the fuel purchased meets the requirements of Permit Conditions C.4.c and C.4.d. Supporting emission calculations shall also be submitted. In addition, emissions from the project shall be reported in the CVR required per Condition 9.C.10 of Part 70/PTO 9102-R4.

C.8 Documents Incorporated by Reference. The document listed below, including any District-approved updates thereof, is incorporated herein and shall have the full force and effect of a permit condition for this operating permit. This document shall be implemented for the life of the project.

- a. *Fuel Measurement Plan – Santa Ynez Unit Pipeline Span Remediation Maintenance Activities —Revision 1 dated October 2011*, and approved by the District on 10/27/2011.

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9.D District-Only Conditions

The following section lists permit conditions that are not enforceable by the USEPA or the public. However, these conditions are enforceable by the District and the State of California. These conditions are issued pursuant to District Rule 206 (*Conditional Approval of Authority to Construct or Permit to Operate*), which states that the Control Officer may issue an operating permit subject to specified conditions. Permit conditions have been determined as being necessary for this permit to ensure that operation of the facility complies with all applicable local and state air quality rules, regulations and laws. Failure to comply with any condition specified pursuant to the provisions of Rule 206 shall be a violation of that rule, this permit, as well as any applicable section of the California Health & Safety Code.

D.1 Permit Activation. All aspects of this permit are enforceable by the District and the State of California upon the issuance date stamped below. The Part 70 aspects of this permit are not final until:

- (a) The USEPA has provided written comments to the District and these comments require no modification to this permit. The District will issue a letter stating that this permit is a final Part 70 permit. The effective date that this permit will be considered a final Part 70 permit will be the date stamped on the District's letter.
- (b) After the USEPA has provided the District written comments that require a modification to this permit, the District will modify this permit to address the USEPA's comments and issue the Part 70 permit as final. The re-issued permit will supersede this permit in its entirety.


AIR POLLUTION CONTROL OFFICER

NOV 14 2011

DATE

Attachments:

- Table 1-5 – Pipeline Span Remediation Project Emission Tables
- Table 6 – Permitted Equipment
- Permit Evaluation for Authority to Construct/Permit to Operate 13696

Notes:

- This permit expires 14 days after Pipeline Span Remediation Activity Termination.

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**Table 1: Operating Equipment Description
ExxonMobil Pipeline Span Remediation Project
ATC/PTO 13696**

Task Description	Days	Vessel	Equipment	HP	Total Hours Used	Max Hrs/day	Load Factor	BSFC (gal/Bhp-hr)	Controls / Emission Factors	SBCAPCD Project Emissions?
Transit to/from field (within SBC portion of CCW)	0.5	Intrepid	Wartsila 8L26A, #1	3326	12	6	0.30	0.055	4	Yes
		Intrepid	Wartsila 8L26A, #2	3326	12	6	0.30	0.055	4	Yes
		Intrepid	Wartsila 8L26A, #3	3326	12	6	0.30	0.055	4	Yes
		Intrepid	Wartsila 8L26A, #4	3326	0	0	0.00	0.055	4	Yes
		Intrepid	Emergency Diver Generator	896	0	0	0.00	0.055	3	Yes
		Intrepid	Bow Anchor Winch (Decommissioned)	-	0	0	0.00	0.055	2	No
		Intrepid	Mob Craft	25	0	0	0.00	0.0493	5	Yes
		Intrepid								
Pipeline Span Remediation	4.5	Intrepid	Wartsila 8L26A, #1	3326	108	24	0.30	0.055	4	Yes
		Intrepid	Wartsila 8L26A, #2	3326	108	24	0.30	0.055	4	Yes
		Intrepid	Wartsila 8L26A, #3	3326	24	24	0.30	0.055	4	Yes
		Intrepid	Wartsila 8L26A, #4	3326	0	0	0.00	0.055	4	Yes
		Intrepid	Emergency Diver Generator	896	0.25	0.25	0.40	0.055	3	Yes
		Intrepid	Bow Anchor Winch (Decommissioned)	-	0	0	0.00	0.055	2	No
		Intrepid	Mob Craft	25	0.25	0.25	0.75	0.0493	5	Yes
		Intrepid								
Total Project Duration										5.0

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**Table 2: Equipment Emission Factors
ExxonMobil Pipeline Span Remediation Project
ATC/PTO 13696**

Equipment Category		Emission Factors										References
		Type	Description	NOx	ROC	CO	SOx	PM	PM10	Units		
Combustion - Water Htr.	1	Diver Hot Water Htr.	20	0.3	5	0.2	2	2	2	lb/1000 gal	AP-42 Tables 1.3-1&3(ROC); distillate oil-fired; units removed from vessel	
Combustion - Engines	2	Mooring Gen Set Bow Anchor Winch	561	44.9	121	0.2	42	40	40	lb/1000 gal	Mooring Gen Set removed from vessel; Winch decommissioned	
Combustion - Engines	3	Em. Diver Generator	277	40	341	0.2	16	15	15	lb/1000 gal	EPA Tier 1, Non-Road (Built 12/2003)	
Combustion - Engines	4	Wartsila Generators	343.7	16.8	78	0.2	33	32	32	lb/1000 gal	Manuf Data (NOx) & AP-42 Vol. II (Table 3.3)	
Combustion - Engines	5	Mob Craft	224	304.9	141	12.0	15	14	14	lb/1000 gal	AP-42 Table 3.3-1 (Gasoline Fuel)	
Combustion - Engines	6	Air Compressor	108	12.0	104	0.2	6	6	6	lb/1000 gal	EPA Tier 3 Non-Road; Removed from vessel	

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**Table 3a: Short-Term Emissions in Santa Barbara County
Total Project Emissions (Pounds)
ExxonMobil Pipeline Span Remediation Project
ATC/PTO 13696**

Task Description	Vessel	Equipment	Estimated Project Emissions (pounds)						
			NOx	ROC	CO	SOx	PM	PM10	
Transit to/from field	Intrepid	Wartsila 8L26A, #1	226.4	11.1	51.6	0.1	21.7	20.9	
	Intrepid	Wartsila 8L26A, #2	226.4	11.1	51.6	0.1	21.7	20.9	
	Intrepid	Wartsila 8L26A, #3	226.4	11.1	51.6	0.1	21.7	20.9	
	Intrepid	Wartsila 8L26A, #4	0.0	0.0	0.0	0.0	0.0	0.0	
Pipeline Span Remediation	Intrepid	Wartsila 8L26A, #1	2037.3	99.6	464.1	1.3	195.6	187.8	
	Intrepid	Wartsila 8L26A, #2	2037.3	99.6	464.1	1.3	195.6	187.8	
	Intrepid	Wartsila 8L26A, #3	452.7	22.1	103.1	0.3	43.5	41.7	
	Intrepid	Wartsila 8L26A, #4	0.0	0.0	0.0	0.0	0.0	0.0	
	Intrepid	Emergency Diver Generator	1.4	0.2	1.7	0.0	0.1	0.1	
	Intrepid	Bow Anchor Winch (Decommissioned)	-	-	-	-	-	-	
	Intrepid	Mob Craft	0.1	0.1	0.0	0.0	0.0	0.0	
Total Emissions Pounds			5208	255	1188	3	500	480	
Total Emissions Tons			2.60	0.13	0.59	0.00	0.25	0.24	

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**Table 4: Long-Term Emissions in Santa Barbara County
ExxonMobil Pipeline Span Remediation Project
ATC/PTO 13696**

Task Description	Vessel	Equipment	Estimated Emissions (TPQ and TPY) ¹						
			NOx	ROC	CO	SOx	PM	PM10	
Transit to/from field	Intrepid	Wartsila 8L26A, #1	0.11	0.01	0.03	0.00	0.01	0.01	
	Intrepid	Wartsila 8L26A, #2	0.11	0.01	0.03	0.00	0.01	0.01	
	Intrepid	Wartsila 8L26A, #3	0.11	0.01	0.03	0.00	0.01	0.01	
	Intrepid	Wartsila 8L26A, #4	0.00	0.00	0.00	0.00	0.00	0.00	
Pipeline Span Remediation	Intrepid	Wartsila 8L26A, #1	1.02	0.05	0.23	0.00	0.10	0.09	
	Intrepid	Wartsila 8L26A, #2	1.02	0.05	0.23	0.00	0.10	0.09	
	Intrepid	Wartsila 8L26A, #3	0.23	0.01	0.05	0.00	0.02	0.02	
	Intrepid	Wartsila 8L26A, #4	0.00	0.00	0.00	0.00	0.00	0.00	
	Intrepid	Emergency Diver Generator	0.00	0.00	0.00	0.00	0.00	0.00	
	Intrepid	Bow Anchor Winch (Decommissioned)	-	-	-	-	-	-	
	Intrepid	Mob Craft	0.00	0.00	0.00	0.00	0.00	0.00	
			Total Emissions Tons	2.60	0.13	0.59	0.00	0.25	0.24

Notes:

(1) TPQ and TPY are identical due to short-term nature of project (approx. 5 days)

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**Table 5: Facility Potential to Emit
ExxonMobil Pipeline Span Remediation Project
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A. Peak Hourly (lb/hr)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
<i>MSV Intrepid</i> Transit (Within SBC)	56.59	2.77	12.89	0.03	5.43	5.22
Maintenance Repairs	58.01	3.03	14.60	0.04	5.52	5.29

Note: *MSV Intrepid* transit and repair do not occur at the same time.

B. Peak Daily (lb/day)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
<i>MSV Intrepid</i> Transit (Within SBC)	339.56	16.60	77.35	0.21	32.60	31.29
Maintenance Repairs	1,359.64	66.65	311.10	0.84	130.47	125.26

Note: *MSV Intrepid* transit and repair do not occur at the same time.

C. Quarterly (tpq)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
<i>MSV Intrepid</i> Transit (Within SBC)	0.34	0.02	0.08	0.00	0.03	0.03
Maintenance Repairs	2.26	0.11	0.52	0.00	0.22	0.21
Total	2.60	0.13	0.59	0.00	0.25	0.24

D. Annual (tpy)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
<i>MSV Intrepid</i> Transit (Within SBC)	0.34	0.02	0.08	0.00	0.03	0.03
Maintenance Repairs	2.26	0.11	0.52	0.00	0.22	0.21
Total	2.60	0.13	0.59	0.00	0.25	0.24

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Table 6 – Permitted Equipment
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Equipment Type	Description	Emission Controls ¹	Operational Status for Project	Permitting Exemptions
<i>MS Intrepid</i> Main Engine #1	Wartsila Model: 8L26A Serial No.: 26567	TC, EA, HPFI	In Use	202.F.8
<i>MS Intrepid</i> Main Engine #2	Wartsila Model: 8L26A Serial No.: 26568	TC, EA, HPFI	In Use	202.F.8
<i>MS Intrepid</i> Main Engine #3	Wartsila Model: 8L26A Serial No.: 26569	TC, EA, HPFI	In Use (As Required)	202.F.8
<i>MS Intrepid</i> Main Engine #4	Wartsila Model: 8L26A Serial No.: 26570	TC, EA, HPFI	Alternate ²	202.F.8
<i>MS Intrepid</i> Diver Emergency Generator	Caterpillar Model: 3412 Serial No.: BPG00441	TC (Tier 1)	Safety, Req'd. Testing Only	202.F.8
Mob Craft	Johnson Outboard Model: J25ELSOB Serial No.: 05108086	None	Safety, Req'd. Testing Only	202.F.8

¹ TC = Turbocharged, AC = Aftercooler, EA = Enhanced Aftercooler, EC = Electronic Controls, HPFI = High Pressure Fuel Injectors, TR = Timing Retard, PC = Precombustion Chamber

² No more than three main engines will be operated at any time except in case of an emergency; the other engine will be available to replace one of the operating engines.



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1.0 BACKGROUND

1.1 General: ExxonMobil operates Outer Continental Shelf Platforms Harmony, Heritage, and Hondo in the Santa Ynez Unit in order to extract oil and gas and transport these products via undersea pipeline to the ExxonMobil processing facility in Las Flores Canyon. The company proposes to conduct a pipeline span remediation maintenance project to “increase the overall safety and integrity of the pipelines.” (from ExxonMobil “*Pipeline Span Remediation Maintenance Activities Project Description.*”)

This pipeline span remediation maintenance activities involve installation of pipeline supports in a high current area in the vicinity of the State Waters 3-mile line. The supports will take the form of concrete bags under and around the pipeline.

An application for the project was submitted on June 9, 2011, and deemed complete on July 6, 2011. On October 18, 2011, revised information was submitted including an updated equipment list and fuel measurement plan. This pipeline span remediation maintenance activity is estimated to take less than one week and the permit limits the pipeline span remediation activity engine NO_x emissions to 10 tons. Consequently, this repair activity is exempt from the New Source Review provisions of regulation VIII by the Rule 202.F.8 exemption for marine vessel engines associated with maintenance and repair activities at a stationary source. All engines were verified to be either propulsion engines, auxiliary engines or permanently affixed support engines, as required by the rule.

1.2 Permit History: The following is a summary of permit activity for the Santa Ynez Unit since the last reevaluation of PT-70/Reeval 09102-R4 in June 2009:

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
ATC 13240	8/6/2009	Burner modification to the central process heater to bring it back into compliance with permit emission limits.
ATC/PTO 13491	10/6/2011	Incorporate fugitive hydrocarbon component emissions associated with projects previously completed under Rule 202.D.6.

1.3 Compliance History: The maintenance activity included in this permit has no compliance history.

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2.0 ENGINEERING ANALYSIS

2.1 Equipment/Processes: The pipeline span remediation project requires the underwater installation of supports on and under the pipeline at several locations to reduce free spans. These activities require a vessel with diving support equipment.

The vessel selected is *MSV Intrepid*, which has four main 3326 hp Wartsila engines for vessel propulsion, positioning, and power generation. Only three of the engines will be used in this project. The *MSV Intrepid* will also use an 896 hp emergency diver generator and a 25 bhp mob craft. On-board equipment which will not be used includes a bow anchor winch.

The *MSV Intrepid* will transit from outside the Santa Barbara County California Coastal Waters (CCW) to the project location. The pipeline span remediation is expected to take less than one week. Upon conclusion of the remediation work, the *MSV Intrepid* will exit the CCW.

Monitoring of fuel use is addressed in *Fuel Measurement Plan – Santa Ynez Unit Pipeline Span Remediation Maintenance Activities – Revision 1* dated October 2011.

2.2 Emission Controls: Table 6 of this permit lists the engines and their controls aboard *MSV Intrepid* that either claim exemption provided by District rules, or are locked out.

2.3 Pipeline Span Remediation Activity Emission Factors: Emission factors and calculated emissions for the pipeline span remediation activity engines listed in Table 6 of this permit are documented in Tables 1-5. The assumptions are based on engine specific data provided by the applicant and may be found in the administrative file for this permit.

2.4 Reasonable Worst Case Emission Scenario for the Pipeline Span Remediation Activity: The following are the activity phases and assumptions used to calculate the estimated emissions for this activity. Detail is provided in Table 1. This permit restricts the potential to emit from the pipeline span remediation vessel engines to less than ten (10) tons per year of pollutant emissions by requiring measurement and reporting of fuel usage in accordance with the *Fuel Measurement Plan – Santa Ynez Unit Pipeline Span Remediation Maintenance Activities -- Revision 1* dated October 2011 and by imposing a cap of 58,140 gallons of fuel used by all engines (Condition 9.C.4.d). This limit was determined by dividing the emission limit (10 tons) by the project's highest emission factor (344 lbs NOx/kgal).

Mobilization:

- Transit through CCW to and from the platform will take 6 hours each way for a total of 12 hours of transit time for the *MSV Intrepid*.
- *MSV Intrepid* transit requires three main engines, operated at a load of approximately 0.3.
- *MSV Intrepid* transits will occur prior to and after pipeline span remediation activities
- No other engines will be used during transit.

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Pipeline span remediation:

- Pipeline span remediation operations excluding mobilization are assumed to occur 24 hours/day for 4.5 days.
- The pipeline span remediation activities will require the three main engines for *MSV Intrepid*. Typical actual loads will be about 0.30.
- The fourth *MSV Intrepid* main engine and the bow anchor winch will not be used.

The worst case emission scenario is based on the following assumptions in the application:

- For hourly worst case: During the pipeline span remediation, *MSV Intrepid* will operate three main engines at 0.30 load, while the emergency diver generator is operating at 0.4 load for 0.25 hours, and the mob craft is operating at 0.75 load for 0.25 hours.
- For daily worst case: During the pipeline span remediation, *MSV Intrepid* will operate three main engines at 0.30 load for 24 hours, while the emergency diver generator is operating at 0.4 load for 0.25 hours, and the mob craft is operating at 0.75 load for 0.25 hours.

2.5 Special Calculations: There are no special calculations.

2.6 BACT Analyses: Best Available Control Technology is not required for the pipeline span remediation activity.

2.7 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the actual emissions of any pollutant are limited to 10 tons for the pipeline span remediation project.

2.8 Monitoring, Recordkeeping, and Reporting Requirements: ExxonMobil is required to comply with an approved *Fuel Measurement Plan – Santa Ynez Unit Pipeline Span Remediation Maintenance Activities – Revision 1* and the conditions of this permit that require that the fuel usage and permit emissions be reported on a daily basis and at the end of the pipeline span remediation activity and included in the Compliance Verification Reports for the Santa Ynez Unit project.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

4.1 Partial List of Applicable Rules: This activity is anticipated to operate in compliance with the following rules:

- Rule 101. Compliance of Existing Facilities
- Rule 201. Permits Required
- Rule 202. Exemptions to Rule 201
- Rule 205. Standards for Granting Permits
- Rule 302. Visible Emissions
- Rule 303. Nuisance
- Rule 309. Specific Contaminants
- Rule 310. Odorous Organic Sulfides
- Rule 311. Sulfur Content of Fuels
- Rule 333. Control of Emissions from Reciprocating Internal Combustion Engines

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- Rule 505. Breakdown Procedures
- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration
- Rule 810. Federal Prevention of Significant Deterioration

4.2 Rules Requiring Review:

4.2.1 *Rule 202 - Exemptions to Rule 201:* Section F.8 exempts marine vessel engines (propulsion engines, auxiliary engines and permanently affixed support engines) associated with repair activities at a stationary source provided that the duration does not exceed 12 consecutive months and the potential to emit is less than 10 tons of NO_x, SO_x, ROCs or particulate matter. An owner or operator may qualify for an exemption from Regulation VIII by obtaining an Authority to Construct/Permit to Operate which limits the potential to emit of such equipment to less than 10 tons per year.

4.2.2 *Rule 802 - Nonattainment Review:* The District is currently designated nonattainment for the state ozone and PM₁₀ standards. The provisions of this rule apply to ozone precursor pollutants (NO_x and ROC), PM₁₀ and PM₁₀ precursor pollutants (NO_x, ROC and SO_x).

4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). This replacement activity is being exempted from the New Source Review provisions of Regulation VIII, and thus there is no increase in NEI.

5.0 AQIA

The project is not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

6.0 OFFSETS/ERCs

6.1 Offsets: As the pipeline span remediation vessel engines are exempt from New Source Review by obtaining a permit and limiting emissions to less than 10 tons per year, offsets are not required since there is no change in NEI.

6.2 ERCs: This activity does not generate emission reduction credits.

7.0 AIR TOXICS

An air toxics health risk assessment was not performed for this permitting action.

8.0 CEQA / LEAD AGENCY

The District is the lead agency under CEQA for this project, and District CEQA Guidelines have been used. Based on our review of this specific project, the District has determined that the permitting action is ministerial (e.g, no discretionary action was taken) and is exempt from CEQA review for the following reasons:

- The Project is not subject to New Source Review (per Rule 202.F.8), and Best Available Control Technology and offsets were not applicable.

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- This permit action required little to no judgment on the part of District staff.

9.0 SCHOOL NOTIFICATION

A school notice pursuant to the requirements of H&SC §42301.6 was not required.

10.0 PUBLIC and AGENCY NOTIFICATION PROCESS/COMMENTS ON DRAFT PERMIT

10.1 This repair activity was not subject to public notice.

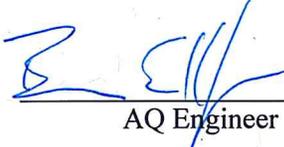
10.2 ExxonMobil requested that permit conditions C.4.a and C.4.b be clarified to allow a warm-up period when the fourth main engine is started to replace one of the three primary main engines. These conditions were revised.

11.0 FEE DETERMINATION

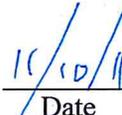
Fees for the District's work efforts are assessed on a reimbursable basis. The project code is 205618 (OPSR-B Active).

12.0 RECOMMENDATION

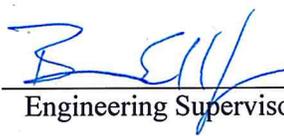
It is recommended that this permit be granted with the conditions as specified in the permit.



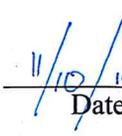
AQ Engineer



Date



Engineering Supervisor



Date