



**Santa Barbara County
Air Pollution Control District**

Our Vision  Clean Air

NOV 01 2011

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

FID: 08003
Permit: AP 13716
SSID: 08003

Re: Proposed Minor Permit Modifications to DCOR LLC's Platform A Part 70/APCD PTO 9110-R3

Dear Mr. Shalev:

This letter transmits Proposed Minor Permit Modification Permit to Operate (PTO) 13716 for modifications to Part 70/APCD PTO 9110-R3. 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 19, 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 13716
Application forms for Minor Modifications to DCOR LLC's Platform A

cc: DCOR-South County 08003 Project File
ECD Chron File



Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

Page 1 of 10

EQUIPMENT OWNER/OPERATOR:

DCOR, LLC

205318

EQUIPMENT LOCATION:

Dos Cuadras South County Platforms

STATIONARY SOURCE/FACILITY:

Dos Cuadras – South County
Platform A

SSID: 08003

FID: 08003

EQUIPMENT DESCRIPTION:

The temporary pipeline replacement equipment is addressed in Section 2.2 of the Permit Evaluation.

PROJECT/PROCESS DESCRIPTION:

The operator will temporarily use two special vessels, the *MSV Intrepid* and the *MV American Spirit*, along with other support equipment to replace pipelines between Platforms A, B, and Hillhouse on the OCS in approximately 190 feet of water. This pipeline replacement activity is expected to take about 33 days to complete. The pipeline replacement activity is being exempted from the New Source Review provisions of Regulation VIII under the provisions of the marine vessel engine exemption in District Rule 202.F.7. This permit is necessary to restrict the potential to emit from the pipeline replacement vessel engines to less than twenty-five (25) tons per year of pollutant emissions.

Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

Page 2 of 10

CONDITIONS:

This section lists the applicable permit conditions for the pipeline replacement activities between Platforms A, B, and Hillhouse. 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 replacement 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 DCOR, LLC 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 DCOR, LLC as required by Rule 210. [*Re: District Rule 210*]
- 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, DCOR, LLC 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.

Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

Page 3 of 10

- 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*]
- 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*]

Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

Page 4 of 10

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 Severability. The provisions of this Permit to Operate are severable and if any provision of this Permit to Operate is held invalid, the remainder of this Permit to Operate shall not be affected thereby. [*Re: District Rules 103 and 1303.D.1*]

A.13 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.14 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
- (d) Actions taken to correct the deviation.

Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

Page 5 of 10

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.15 **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.16 **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.17 **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.18 **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 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

Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

Page 6 of 10

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.19 **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]

Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

Page 7 of 10

- B.2. **Visible Emissions (Rule 302).** DCOR, LLC 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 DCOR, LLC 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).** DCOR, LLC 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).** DCOR, LLC 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. DCOR, LLC 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).** DCOR, LLC 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]

Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

Page 8 of 10

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 replacement activity.

- C.1 **Pipeline Replacement Activity Termination.** Pipeline replacement activity termination is defined as the date the replacement activity vessel leaves the California Coastal Waters adjacent to Santa Barbara County as defined in District Rule 102 after completion of all replacement work. DCOR, LLC shall notify the District within 3-days after the repair activity termination date.
- C.2 **Pipeline Replacement Activity Emissions Cap.** Actual emissions of NO_x from the replacement activity engines listed in Tables 1-6 of this permit shall not exceed 25 tons during the duration of this repair activity. The duration of the repair activity shall not exceed 12 consecutive months.
- C.3 **Pipeline Replacement Activity Start-up Notification.** DCOR, LLC shall notify the District within 2 days after each pipeline replacement vessel has entered the California Coastal Waters adjacent to Santa Barbara County as defined in District Rule 102.
- C.4 **Operational Restrictions.**
- a. *MSV Intrepid* Main Engine #4 and Emergency Auxiliary Generator as listed in Table 6 of this permit shall only be used in the event of the breakdown or maintenance/repair of one of the other Wartsila main engines.
 - b. At no time shall more than three of the *MSV Intrepid* Main engines operate at the same time.
 - 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 replacement fuel consumption shall not exceed 145,348 gallons of CARB ultra low sulfur Diesel.
 - e. *Specialty Equipment.* No equipment other than that listed in Table 6 shall be used for pipeline replacement activities without a District permit; however, DCOR, LLC may apply for exemption for specialty equipment under Rule 202.F.5.
- C.5 **Fuel Monitoring.** DCOR, LLC shall implement fuel use monitoring in accordance with the *Fuel Measurement Plan – Pipeline Replacement Project – Platforms A, B, and Hillhouse* dated June 22, 2011, and approved by the District on 10/31/2011.
- C.6 **Pipeline Replacement Activity Weekly Report.** DCOR, LLC shall record engine fuel use and project emissions on a daily basis. A fuel use and emissions report, including cumulative project

Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

Page 9 of 10

and daily totals, shall be provided via e-mail to the District each week (attn: Stefanie Boehme) for the duration of the project. Emission calculations documentation for the weekly reports shall be provided to the District upon request.

- C.7 **Pipeline Replacement Activity Completion Report.** Within 14-days after the repair activity termination, DCOR, LLC 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 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.16 of Part 70/PTO 9110-R3.
- 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. *District Fuel Measurement Plan – Pipeline Replacement Project – Platforms A, B, and Hillhouse* dated June 22, 2011, and approved by the District on 10/31/2011.

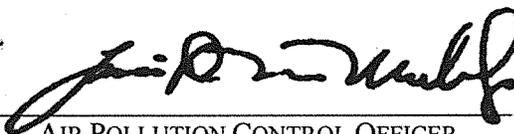
9.D District-Only Conditions

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.

Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

Page 10 of 10



AIR POLLUTION CONTROL OFFICER

NOV 01 2011

DATE

Attachments:

- Table 1-4 – Pipeline Replacement Project Emission Tables
- Table 5 – Permitted Equipment
- Permit Evaluation for Authority to Construct/Permit to Operate 13716

Notes:

- This permit expires 14 days after Pipeline Replacement Activity Termination as defined in Condition C.1.

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Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

Table 1: Operating Equipment Description
DCOR LLC Pipeline Replacement Project
ATC/PTO 13716

ID	Task Description	Days	Vessel	Equipment	HP	Hours Used	Load Factor	BSFC (gal/bhp-hr)	Controls / Emission Factors	SBC/APCD Project Emissions?	Note
44	Phase 1, Mobilization	1.0	Intrepid	Wartsila 8L26A, #1	3326	6	0.65	0.055	4	Yes	
			Intrepid	Wartsila 8L26A, #2	3326	6	0.65	0.055	4	Yes	
			Intrepid	Wartsila 8L26A, #3	3326	6	0.65	0.055	4	Yes	
			Intrepid	Wartsila 8L26A, #4	3326	0	0.65	0.055	4	Yes	
44	Phase 2, Pipelay B to A 8" Gas and Oil Lines	3.0	Intrepid	Wartsila 8L26A, #1	3326	24	0.25	0.055	4	Yes	
			Intrepid	Wartsila 8L26A, #2	3326	24	0.25	0.055	4	Yes	
			Intrepid	Wartsila 8L26A, #3	3326	24	0.25	0.055	4	Yes	
			Intrepid	Wartsila 8L26A, #4	3326	0	0.25	0.055	4	Yes	
45	Phase 3, Pipelay Hillhouse to A 6" Gas Line	1.0	Intrepid	Emergency Auxiliary Generator, CAT 3412	896	0	0.85	0.055	3	Yes	
			Intrepid	Wartsila 8L26A, #1	3326	24	0.25	0.055	4	Yes	
			Intrepid	Wartsila 8L26A, #2	3326	24	0.25	0.055	4	Yes	
			Intrepid	Wartsila 8L26A, #3	3326	24	0.25	0.055	4	Yes	
46	Phase 4, Pipelay A to ROSF 12" Oil and Gas Lines	11	Intrepid	Wartsila 8L26A, #4	3326	0	0.25	0.055	4	Yes	
			Intrepid	Emergency Auxiliary Generator, CAT 3412	896	0	0.85	0.055	3	Yes	
			American Spirit Mobilization	Mains Underway, two (2) CAT C-18, 450 bhp each	900	6	0.65	0.055	1	Yes	
			American Spirit Mobilization	GenSet, Mariner "J" Series, 21 kW	28.2	6	0.50	0.055	1	Yes	
46	Phase 4, Pipelay A to ROSF 12" Oil and Gas Lines	11	Intrepid	Wartsila 8L26A, #1	3326	24	0.25	0.055	4	Yes	
			Intrepid	Wartsila 8L26A, #2	3326	24	0.25	0.055	4	Yes	
			Intrepid	Wartsila 8L26A, #3	3326	24	0.25	0.055	4	Yes	
			Intrepid	Wartsila 8L26A, #4	3326	0	0.25	0.055	4	Yes	
46	Phase 4, Pipelay A to ROSF 12" Oil and Gas Lines	11	Intrepid	Emergency Auxiliary Generator, CAT 3412	896	0	0.85	0.055	3	Yes	
			American Spirit	Mains Underway, two (2) CAT C-18, 450 bhp each	900	1	0.65	0.055	1	Yes	
			American Spirit	Mains Standby, two (2) CAT C-18, 450 bhp each	900	23	0.0	0.055	1	Yes	
			American Spirit	GenSet, Mariner "J" Series, 21 kW	28.2	24	0.50	0.055	1	Yes	
46	American Spirit De-Mobilization Occurs on day 11 of Phase 4		American Spirit	Mains Underway, two (2) CAT C-18, 450 bhp each	900	6	0.65	0.055	1	Yes	
			American Spirit	GenSet, Mariner "J" Series, 21 kW	28.2	6	0.50	0.055	1	Yes	

Authority to Construct/Permit to Operate 13716

and

Part 70 Minor Modification 13716

47	Phase 5, Subsea Tie-in B to A 8" Gas and Oil Lines	4.0	Intrepid	Wartsila 8L26A, #1	3326	24	0.25	0.055	4	Yes
			Intrepid	Wartsila 8L26A, #2	3326	24	0.25	0.055	4	Yes
			Intrepid	Wartsila 8L26A, #3	3326	24	0.25	0.055	4	Yes
			Intrepid	Wartsila 8L26A, #4	3326	0	0.25	0.055	4	Yes
49	Phase 6, Subsea Tie-in 12" Gas Line (to be Oil)	5.0	Intrepid	Emergency Auxiliary Generator, CAT 3412	896	0	0.85	0.055	3	Yes
			Intrepid	Wartsila 8L26A, #1	3326	24	0.25	0.055	4	Yes
			Intrepid	Wartsila 8L26A, #2	3326	24	0.25	0.055	4	Yes
			Intrepid	Wartsila 8L26A, #3	3326	24	0.25	0.055	4	Yes
55	Phase 7, Subsea Tie-in A to ROSF	5.0	Intrepid	Wartsila 8L26A, #4	3326	0	0.25	0.055	4	Yes
			Intrepid	Emergency Auxiliary Generator, CAT 3412	665	0	0.85	0.055	3	Yes
			Intrepid	Wartsila 8L26A, #1	3326	24	0.25	0.055	4	Yes
			Intrepid	Wartsila 8L26A, #2	3326	24	0.25	0.055	4	Yes
59	Phase 8, Subsea Tie-in and Topside Platform Work HH to A	2.0	Intrepid	Wartsila 8L26A, #3	3326	24	0.25	0.055	4	Yes
			Intrepid	Wartsila 8L26A, #4	3326	0	0.25	0.055	4	Yes
			Intrepid	Emergency Auxiliary Generator, CAT 3412	896	0	0.85	0.055	3	Yes
			Intrepid	Wartsila 8L26A, #1	3326	24	0.25	0.055	4	Yes
Phase 9, De-mob	1.0		Intrepid	Wartsila 8L26A, #2	3326	24	0.25	0.055	4	Yes
			Intrepid	Wartsila 8L26A, #3	3326	24	0.25	0.055	4	Yes
			Intrepid	Wartsila 8L26A, #4	3326	0	0.25	0.055	4	Yes
			Intrepid	Emergency Auxiliary Generator, CAT 3412	896	0	0.85	0.055	3	Yes
Total Project Duration 33.0										

Additional Electric Equipment to be Utilized:
 Jet Pump - Electric*
 Feeder Pump - Electric*
 Hot Water Unit #1 - Electric*
 Hot Water Unit #2 - Electric*

Authority to Construct/Permit to Operate 13716
and

Part 70 Minor Modification 13716

**Table 2: Equipment Emission Factors
DCOR LLC Pipeline Replacement Project
ATC/PTO 13716**

		Emission Factors									
Equipment Category	Emission Controls		NOx	ROC	CO	SOx	PM	PM10	Units	References	
	Type	Description									
Combustion - Engines	1	Harborcraft Tier 2	194	16.8	148	0	33	33	lb/1000 gal	Harborcraft Table 2	
Combustion - Engines	3	Intrepid Aux	337	16.8	78	28	33	32	lb/1000 gal	Manuf Data (NOx) & AP-42 Vol. II (Table 3.3)	
Combustion - Engines	4	Wartsila Generators	344	16.8	78	0	33	32	lb/1000 gal		

Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

**Table 3: Short-Term Emissions in Santa Barbara County
DCOR LLC Pipeline Replacement Project
ATC/PTO 13716**

Task Description	Vessel	Equipment	Estimated Emissions (pounds)						
			NOx	ROC	CO	SOx	PM	PM10	
Phase 1, Mobilization	Intrepid	Wartsila 8L26A, #1	245.2	12.0	55.9	0.2	23.5	22.6	
	Intrepid	Wartsila 8L26A, #2	245.2	12.0	55.9	0.2	23.5	22.6	
	Intrepid	Wartsila 8L26A, #3	245.2	12.0	55.9	0.2	23.5	22.6	
	Intrepid	Wartsila 8L26A, #4	0.0	0.0	0.0	0.0	0.0	0.0	
Phase 2, Pipeline B to A 8" Gas and Oil Lines	Intrepid	Wartsila 8L26A, #1	1131.9	55.3	257.8	0.7	108.7	104.3	
	Intrepid	Wartsila 8L26A, #2	1131.9	55.3	257.8	0.7	108.7	104.3	
	Intrepid	Wartsila 8L26A, #3	1131.9	55.3	257.8	0.7	108.7	104.3	
	Intrepid	Wartsila 8L26A, #4	0.0	0.0	0.0	0.0	0.0	0.0	
	Intrepid	Emergency Auxiliary Generator, CAT 3412	0.0	0.0	0.0	0.0	0.0	0.0	
	Alan T	Mains Underway, Scania D116 M	-	-	-	-	-	-	
	Alan T	Mains Underway, Scania D116 M	-	-	-	-	-	-	
	Alan T	Mains Underway, Scania D116 M	-	-	-	-	-	-	
	Alan T	Mains Underway, Scania D116 M	-	-	-	-	-	-	
	Alan T	Generators, (2) Alaska Diesel N. Lighis (2)	-	-	-	-	-	-	
Phase 3, Pipeline Hillhouse to A 6" Gas Line	Intrepid	Wartsila 8L26A, #1	377.3	18.4	85.9	0.2	36.2	34.8	
	Intrepid	Wartsila 8L26A, #2	377.3	18.4	85.9	0.2	36.2	34.8	
	Intrepid	Wartsila 8L26A, #3	377.3	18.4	85.9	0.2	36.2	34.8	
	Intrepid	Wartsila 8L26A, #4	0.0	0.0	0.0	0.0	0.0	0.0	
	Intrepid	Emergency Auxiliary Generator, CAT 3412	0.0	0.0	0.0	0.0	0.0	0.0	
	Alan T	Mains Underway, Scania D116 M	-	-	-	-	-	-	
	Alan T	Mains Underway, Scania D116 M	-	-	-	-	-	-	
	Alan T	Mains Underway, Scania D116 M	-	-	-	-	-	-	
	Alan T	Generators, (2) Alaska Diesel N. Lighis	-	-	-	-	-	-	
	American Spirit Mobilization	Mains Underway, two (2) CAT C-18, 450 bhp each	37.5	3.2	28.6	0.0	6.4	6.4	
	American Spirit Mobilization	GenSet, Mariner "I" Series, 21 kW	0.9	0.1	0.7	0.0	0.2	0.2	
	Phase 4, Pipeline A to ROSF 12" Oil and Gas Lines	Intrepid	Wartsila 8L26A, #1	4150.1	202.8	945.3	2.6	398.4	382.5
		Intrepid	Wartsila 8L26A, #2	4150.1	202.8	945.3	2.6	398.4	382.5
Intrepid		Wartsila 8L26A, #3	4150.1	202.8	945.3	2.6	398.4	382.5	
Intrepid		Wartsila 8L26A, #4	0.0	0.0	0.0	0.0	0.0	0.0	
Intrepid		Emergency Auxiliary Generator, CAT 3412	0.0	0.0	0.0	0.0	0.0	0.0	
American Spirit		Mains Underway, two (2) CAT C-18, 450 bhp each	68.7	5.9	52.5	0.1	11.7	11.7	
American Spirit		Mains Standby, two (2) CAT C-18, 450 bhp each	0.0	0.0	0.0	0.0	0.0	0.0	
American Spirit		GenSet, Mariner "I" Series, 21 kW	39.7	3.4	30.4	0.0	6.8	6.8	
American Spirit Mobilization		Mains Underway, two (2) CAT C-18, 450 bhp each	37.5	3.2	28.6	0.0	6.4	6.4	
American Spirit Mobilization Occurs on day 11 of Phase 4		GenSet, Mariner "I" Series, 21 kW	0.9	0.1	0.7	0.0	0.2	0.2	

Authority to Construct/Permit to Operate 13716

and

Part 70 Minor Modification 13716

Phase 5, Subsea Tie-in B to A 8" Gas and Oil Lines	Intrepid	Wartsila 8L26A #1	1509.1	73.8	343.8	0.9	144.9	139.1
	Intrepid	Wartsila 8L26A #2	1509.1	73.8	343.8	0.9	144.9	139.1
	Intrepid	Wartsila 8L26A #3	1509.1	73.8	343.8	0.9	144.9	139.1
	Intrepid	Wartsila 8L26A #4	0.0	0.0	0.0	0.0	0.0	0.0
Phase 6, Subsea Tie-in 12" Gas Line (to be Off)	Intrepid	Emergency Auxiliary Generator, CAT 3412	0.0	0.0	0.0	0.0	0.0	0.0
	Alan T	Mains Underway, Scania DH16 M	-	-	-	-	-	-
	Alan T	Mains Underway, Scania DH16 M	-	-	-	-	-	-
	Alan T	Mains Underway, Scania DH16 M	-	-	-	-	-	-
	Alan T	Generators, (2) Alaska Diesel/N. Lights	-	-	-	-	-	-
	Intrepid	Wartsila 8L26A #1	1886.4	92.2	429.7	1.2	181.1	173.9
	Intrepid	Wartsila 8L26A #2	1886.4	92.2	429.7	1.2	181.1	173.9
Phase 7, Subsea Tie-in A to ROSF	Intrepid	Wartsila 8L26A #3	1886.4	92.2	429.7	1.2	181.1	173.9
	Intrepid	Wartsila 8L26A #4	0.0	0.0	0.0	0.0	0.0	0.0
	Intrepid	Emergency Auxiliary Generator, CAT 3412	0.0	0.0	0.0	0.0	0.0	0.0
	Intrepid	Wartsila 8L26A #1	1886.4	92.2	429.7	1.2	181.1	173.9
Phase 8, Subsea Tie-in and Topside Platform Work, HH to A	Intrepid	Wartsila 8L26A #2	1886.4	92.2	429.7	1.2	181.1	173.9
	Intrepid	Wartsila 8L26A #3	1886.4	92.2	429.7	1.2	181.1	173.9
	Intrepid	Wartsila 8L26A #4	0.0	0.0	0.0	0.0	0.0	0.0
	Intrepid	Emergency Auxiliary Generator, CAT 3412	0.0	0.0	0.0	0.0	0.0	0.0
Phase 9, De-mob	Intrepid	Wartsila 8L26A #1	754.6	36.9	171.9	0.5	72.4	69.5
	Intrepid	Wartsila 8L26A #2	754.6	36.9	171.9	0.5	72.4	69.5
	Intrepid	Wartsila 8L26A #3	754.6	36.9	171.9	0.5	72.4	69.5
	Intrepid	Wartsila 8L26A #4	0.0	0.0	0.0	0.0	0.0	0.0
Total Emissions Pounds	Intrepid	Emergency Auxiliary Generator, CAT 3412	0.0	0.0	0.0	0.0	0.0	0.0
	Intrepid	Wartsila 8L26A #1	245.2	12.0	55.9	0.2	23.5	22.6
	Intrepid	Wartsila 8L26A #2	245.2	12.0	55.9	0.2	23.5	22.6
	Intrepid	Wartsila 8L26A #3	245.2	12.0	55.9	0.2	23.5	22.6
			36744	1803	8469	23	3541	3401
Total Emissions Pounds			18.4	0.9	4.2	0.0	1.8	1.7

Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

**Table 4: Facility Potential to Emit
DCOR LLC Pipeline Replacement Project
ATC/PTO 13716**

A. Hourly (lb/hr)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
<i>MSV Intrepid</i> Transit (Within SBC)	122.62	5.99	27.93	0.08	11.77	11.30
Pipelay (Phase 4)	53.40	2.85	15.51	0.04	5.59	5.41

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

B. Daily (lb/day)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
<i>MSV Intrepid</i> Transit (Within SBC)	735.71	35.96	167.58	0.45	70.63	67.80
Pipelay Phase 4, Day 11	1,179.16	59.49	294.67	0.75	116.86	112.51

Note 1: *MSV Intrepid* transit and pipelay do not occur at the same time.

Note 2: Pipelay Phase 4, Day 11 includes *MV American Spirit* Transit

C. Quarterly (tpq)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
<i>MSV Intrepid</i> Transit (Within SBC)	0.74	0.04	0.17	0.00	0.07	0.07
Pipelay and <i>American Spirit</i> Transit	17.64	0.87	4.07	0.01	1.70	1.63
Total	18.37	0.90	4.23	0.01	1.77	1.70

D. Annual (tpy)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
<i>MSV Intrepid</i> Transit (Within SBC)	0.74	0.04	0.17	0.00	0.07	0.07
Pipelay and <i>American Spirit</i> Transit	17.64	0.87	4.07	0.01	1.70	1.63
Total	18.37	0.90	4.23	0.01	1.77	1.70

Authority to Construct/Permit to Operate 13716
and
Part 70 Minor Modification 13716

**Table 5 – Permitted Equipment
DCOR LLC Pipeline Replacement Project
ATC/PTO 13716**

Equipment Type	Description	Emission Controls¹	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.7
<i>MS Intrepid</i> Main Engine #2	Wartsila Model: 8L26A Serial No.: 26568	TC, EA, HPFI	In Use	202.F.7
<i>MS Intrepid</i> Main Engine #3	Wartsila Model: 8L26A Serial No.: 26569	TC, EA, HPFI	In Use (As Required)	202.F.7
<i>MS Intrepid</i> Main Engine #4	Wartsila Model: 8L26A Serial No.: 26570	TC, EA, HPFI	Alternate ²	202.F.7
<i>MS Intrepid</i> Emergency Auxiliary Generator	Caterpillar Model: 3412 Serial No.:	TC, AC	Emergency	202.F.7
<i>MS American Spirit</i> Main Engine #1	Caterpillar Model: C-18 Serial No.: T2POO379	TC, AC, Fuel Injection, Tier 2	In Use	202.F.7
<i>MS American Spirit</i> Main Engine #2	Caterpillar KHD Deutz A50 Model: C-18 Serial No.: T2POO381	TC, AC, Fuel Injection, Tier 2	In Use	202.F.7
<i>MS American Spirit</i> GenSet	Isuzu Mariner "I" Series Model: SZXL02.2VNC Family (21kW) Serial No.: 4LE-1-215197	Tier 2	In Use	202.F.7

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.



PERMIT EVALUATION FOR
AUTHORITY TO CONSTRUCT/PERMIT TO OPERATE 13716
 and
PART 70 MINOR MODIFICATION 13716

Page 1 of 5

1.0 BACKGROUND

1.1 General: DCOR, LLC operates platforms A, B, and Hillhouse to extract oil and gas and transport these products via undersea pipeline to onshore Rincon pipelines. The company proposes to conduct a pipeline replacement project to “voluntarily and proactively enhance the integrity of the Dos Cuadras field undersea oil and gas pipeline network.” (from DCOR *“Pipeline Replacement Project Summary.”*)

This pipeline replacement project involves (1) installing 2,811 feet of new 6 inch gas pipeline between Platform Hillhouse and Platform A, (2) installing 2,500 feet of new 8 inch oil and gas pipeline between Platforms A and B, and (3) installing 200 feet of new 12 inch oil pipeline and 3,000 feet of new 12 inch gas pipeline from Platform A into the existing main Platform B to Rincon trunk lines. The modified pipelines will become the main Platform A to Rincon oil and gas pipelines. After the project is complete, all oil and gas produced from the Dos Cuadras Field will be routed to Platform A and then to Rincon.

An application for the project was submitted on June 24, 2011, and deemed complete on July 14, 2011. This pipeline replacement activity is estimated to take 33 days and the permit limits the pipeline replacement activity engine NO_x emissions to 25 tons. Consequently, this repair activity is exempt from the New Source Review provisions of regulation VIII by the Rule 202.F.7 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 Platform A since PT-70/Reeval 9110-R3 was issued:

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
ATC 13616	04/19/2011	Replace the engines on the M/V Alan T and M/V Ryan T.
ATC 13713	10/03/2011	Change oil and gas pipeline pig launchers and receivers.

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

PERMIT EVALUATION FOR
AUTHORITY TO CONSTRUCT/PERMIT TO OPERATE 13716
and
PART 70 MINOR MODIFICATION 13716

Page 2 of 5

2.0 ENGINEERING ANALYSIS

- 2.1 Equipment/Processes: The pipeline replacement project requires laying the new pipeline between the platforms including underwater support work. These activities require a pipe laying vessel with diving support equipment, a tug to transport a barge containing pipe from Long Beach, a crew boat to assist in case of emergency, and Platform A and Hillhouse crane engines for assistance.

The pipeline laying 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* also has a 896 hp emergency auxiliary generator.

The tug selected is *MV American Spirit*, which has two Caterpillar C-18 450 hp main engines with Tier 2 emission ratings and a Mariner "I" series 28.2 hp auxiliary generator with Tier 2 emission ratings. After delivery of the barge, this tug will remain moored for 11 days during which it will operate only the auxiliary generator. It will then return the barge to Long Beach.

In addition, equipment currently permitted under PTOs 9110, 9111, and 9114 will be used in this project. The crew boat Alan T will assist the Intrepid in case of emergency and the Platform A and Hillhouse south crane engines will be used during certain phases of the project for one hour per day. The currently permitted fuel and emission limits for the Alan T and the platform cranes will not be exceeded.

Monitoring of fuel use is addressed in *Fuel Measurement Plan – Pipeline Replacement Project – Platforms A, B, and Hillhouse* dated June 22, 2011, and approved by the District on 10/31/2011.

- 2.2 Emission Controls: Table 5 of this permit lists the engines and their controls aboard *MSV Intrepid* and *MV American Spirit* that claim exemption provided by District rules.
- 2.3 Pipeline Replacement Activity Emission Factors: Emission factors and calculated emissions for the pipeline replacement activity engines listed in Table 5 of this permit are documented in Tables 1-4. 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 Replacement 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 replacement vessel engines to less than twenty-five (25) tons per year of pollutant emissions by imposing a cap of 145,348 gallons of fuel used by all engines (Condition 9.C.4.b). This limit was determined by dividing the emission limit (25 tons) by the project's highest emission factor (344 lbs NOx/kgal).

Mobilization:

- Transit to and from the platform will take 6 hours each way for a total of 12 hours of transit time each for the *MSV Intrepid* and *MV American Spirit*.

PERMIT EVALUATION FOR
AUTHORITY TO CONSTRUCT/PERMIT TO OPERATE 13716
and
PART 70 MINOR MODIFICATION 13716

Page 3 of 5

- *MSV Intrepid* transit requires three main engines, operated at a load of approximately 0.65. *MV American Spirit* transit requires two main engines operated at a load of 0.65 and an auxiliary generator operated at a load of 0.50.
- *MSV Intrepid* transits will occur prior to and after pipeline replacement activities. *MV American Spirit* transits to and from Long Beach will occur during the pipeline replacement and tie-in phase of the project described below.
- Auxiliary engines will not be used during transit.

Pipeline Replacement and Tie-in:

- Pipeline replacement operations excluding mobilization are assumed to occur 24 hours/day for up to 31 days.
- The pipeline replacement activities will require the three main engines for *MSV Intrepid*. Typical actual loads will be about 0.25.
- The fourth *MSV Intrepid* main engine and the emergency auxiliary generator will not be used.
- The two main engines of *MV American Spirit* will idle 23 hours per day at a load of 0.0 and operate one hour per day at a load of 0.65 for the 11 days that the vessel is on site. On one of those days, the two main engines will operate for one hour at a load of 0.65. During this 11 day period, the *MV American Spirit* auxiliary generator will operate 24 hours per day at a load of 0.50.
- The crew boat *Alan T* (currently permitted) will use its three main engines at a load of 0.65 and the auxiliary generator at a load of 0.5 for one hour per day for 20 days.
- The Platform A and Hillhouse south cranes (currently permitted) will be used during certain phases of the project for one hour per day.

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

- For hourly worst case: *MSV Intrepid* transit to and from Long Beach with three main engines operating at 0.65 load.
- For daily worst case: The last day of Phase 4 which includes pipelay by the *MSV Intrepid* operating three main engines at 0.25 load for 24 hours, the *MV American Spirit* two main engines operating for seven hours (six of which are in transit) at 0.65 load and the *MV American Spirit* GenSet operating for 24 hours at 0.50 load

- 2.5 Special Calculations: There are no special calculations.
- 2.6 BACT Analyses: Best Available Control Technology was not required for the pipeline replacement activity.
- 2.7 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the actual emissions of any pollutant are limited to 25 tons for the pipeline replacement project.
- 2.8 Monitoring, Recordkeeping, and Reporting Requirements: DCOR, LLC is required to comply with an approved *Fuel Measurement Plan – Pipeline Replacement Project – Platforms A, B, and Hillhouse* and the conditions of this permit that require that the fuel usage and permit emissions be

PERMIT EVALUATION FOR
AUTHORITY TO CONSTRUCT/PERMIT TO OPERATE 13716
and
PART 70 MINOR MODIFICATION 13716

Page 4 of 5

reported on a daily basis and at the end of the pipeline replacement activity and included in the Compliance Verification Reports for the Dos Cuadras 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
- Rule 505. Breakdown Procedures
- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration

4.2 Rules Requiring Review:

4.2.1 *Rule 202 - Exemptions to Rule 201*: Section F.7 exempts equipment associated with pipe-laying activities at a stationary source provided that the duration does not exceed 12 consecutive months and the potential to emit is less than 25 tons per year of any affected pollutant. 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 25 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

PERMIT EVALUATION FOR
AUTHORITY TO CONSTRUCT/PERMIT TO OPERATE 13716
and
PART 70 MINOR MODIFICATION 13716

Page 5 of 5

6.0 OFFSETS/ERCs

6.1 Offsets: As the pipeline replacement vessel engines are exempt from New Source Review by obtaining a permit and limiting emissions to less than 25 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.
- The Fuel Measurement Plan is nearly identical to previous plans reviewed by the APCD.

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 DCOR, LLC submitted comments on the draft. DCOR's comments and the District's responses are attached.

The rating of the emergency auxiliary generator was updated to 896 bhp.

11.0 FEE DETERMINATION

Fees for the District's work efforts are assessed on a reimbursable basis. The project code is 205318 (OCS Platform A).

12.0 RECOMMENDATION

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



AQ Engineer

10/31/11

Date

Ben Ellenberger 

Engineering Supervisor

10/31/11

Date

Attachments:

Comments on Draft Permit

Comments on Draft Permit:

- 1) Conditions Section / 9.D.1 – Permit Activation (Page 9 of 10): Not exactly sure what the wording in this section means as far as when the final permit will be issued. Does this mean that the District is now going to be requesting EPA comments that could take an additional 45 days before the permit can be issued and work can commence? I was under the understanding that EPA comment was not required for this permit action since NSR is not triggered? Or is this just standard boiler plate permit language that applies to a Part 70 permit action but will not affect the District approval and issuance of this permit? If an additional 45 days is required, this will be very problematic.

District Response: The Authority to Construct is final the date it is issued and DCOR may commence operations under the ATC. However, the Part 70 aspects of the permit are not final until the EPA review period is over.

- 2) Permit Evaluation Section – Permit History (Page 1 of 5): There is a reference to Platform Heritage in error. This needs to be updated with recent Platform A, B, and Hillhouse permit activity. Recent activity includes crew and supply boat engine re-powering ATC for A, B, and HH and a flare tip replacement ATC on Platform Hillhouse.

District Response: The permit history has been updated.

- 3) The spelling of the crew boat Alan T needs to be corrected throughout the permit. It is now referred to as the Allan T in error.

District Response: The spelling has been corrected.

- 4) Engineering Analysis Section 2.2 (Page 2 of 5): Not sure what is meant at the end of this section “or locked out”?

District Response: “or locked out” has been removed. Since all of the engines on the vessel may be operated during the project, they are all listed in Table 5. Fuel use must be recorded for any engine used on the MS Intrepid or MS American Spirit during the project and emissions must be calculated.