



air pollution control district  
SANTA BARBARA COUNTY

**DRAFT**

**PERMIT TO OPERATE 9102 – R8  
AND  
PART 70 OPERATING PERMIT 9102**

**SABLE OFFSHORE – SYU PROJECT  
PLATFORM HERITAGE**

**PARCEL OCS P-0182  
SANTA YNEZ UNIT  
SANTA BARBARA COUNTY, CA  
OUTER CONTINENTAL SHELF**

**OPERATOR**

**SABLE OFFSHORE CORP. (SABLE)**

**OWNERSHIP**

**SABLE OFFSHORE CORP. (SABLE)**

**SANTA BARBARA COUNTY  
AIR POLLUTION CONTROL DISTRICT**

**APRIL 2024**

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## ABBREVIATIONS/ACRONYMS

acf	Actual Cubic Feet
APCO	Air Pollution Control Officer
AP-42	USEPA <i>Compilation of Emission Factors</i> document
API	American Petroleum Institute
ASTM	American Society for Testing and Materials
ATC	Authority to Construct permit
BOEM	Bureau of Ocean Energy Management
BS&W	Basic sediment and water
bhp	brake horsepower
bpd	barrels per day (42 gallons per barrel)
BSFC	brake-specific fuel consumption
Btu	British thermal unit
CAAA	Clean Air Act Amendments of 1990
CAM	Compliance Assured Monitoring
CAP	Clean Air Plan
CARB	California Air Resources Board
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
clp	component-leakpath
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
COA	corresponding offshore area
District	Santa Barbara County Air Pollution Control District
ERC	emission reduction credit
FHC	fugitive hydrocarbon
FR	Federal Register
gr	grain
g	gram
gal	gallon
GHG	Greenhouse Gas
HHV	higher heating value
H <sub>2</sub> S	hydrogen sulfide
H&SC	California Health and Safety Code
IC	internal combustion
I&M	inspection and maintenance
k	thousand
kV	kilovolt
lb	pound
LFC	Las Flores Canyon
LHV	lower heating value
MCC	motor control center
MDEA	methyl diethanolamine
MM, mm	million
MSDS	Material Safety Data Sheet
MW	molecular weight, Megawatts
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NGL	natural gas liquids
NO <sub>x</sub>	oxides of nitrogen (calculated as NO <sub>2</sub> )
NSPS	New Source Performance Standards
OCS	Outer Continental Shelf
PFD	process flow diagram
P&ID	pipng and instrumentation diagram
POPCO	Pacific Offshore Pipeline Company

PTO	Permit to Operate permit
PTO Mod	Permit to Operate Modification permit
ppmv	parts per million volume (concentration)
ppmw	parts per million weight
psia	pounds per square inch absolute
psig	pounds per square inch gauge
PM	particulate matter
PM <sub>10</sub>	particulate matter less than 10 µm in size
PM <sub>2.5</sub>	particulate matter less than 2.5 µm in size
PSV	pressure safety valve
PTE	potential to emit
PTO	Permit to Operate
PRD	pressure relief device
PVRV	pressure vacuum relief valve
ROC	reactive organic compounds
scf	standard cubic feet
scfd	standard cubic feet per day
scfm	standard cubic feet per minute
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SO <sub>x</sub>	sulfur oxides
SYU	Santa Ynez Unit
TEG	triethylene glycol
TOC	total organic compounds
tpq	tons per quarter
tpy	tons per year
Trn O/O	transfer of owner/operator permit application
TVP	true vapor pressure
USEPA	United States Environmental Protection Agency or EPA
UPS	uninterrupted power supply
VRS	vapor recovery system
wt %	weight percent

Fuel Types as listed in Section 5:

D2	Diesel
PG	Flare Purge and Pilot Gas
PR	Produced Gas
SG	Sales Gas

## 1.0 Introduction

### 1.1. Purpose

General. The Santa Barbara County Air Pollution Control District (District) is responsible for implementing all applicable federal, state and local air pollution requirements which affect any stationary source of air pollution in Santa Barbara County. The federal requirements include regulations listed in the Code of Federal Regulations: 40 CFR Parts 50, 51, 52, 55, 60, 61, 63, 68, 70 and 82. The State regulations may be found in the California Health & Safety Code, Division 26, Section 39000 et seq. The applicable local regulations can be found in the District's Rules and Regulations. This is a combined permitting action that covers both the renewal of the Federal Part 70 permit (*Part 70 Operating Permit 9102*) as well as the reevaluation of the State Operating Permit (*Permit to Operate 9102*).

Santa Barbara County is designated as an ozone non-attainment area for the state ambient air quality standards. The County is also designated a non-attainment area for the state PM<sub>10</sub> ambient air quality standard.

Part 70 Permitting. The initial Part 70 permit for Platform Heritage was issued January 11, 2000 in accordance with the requirements of the District's Part 70 operating permit program. This permit is the eighth renewal of the Part 70 permit, and may include additional applicable requirements. The District triennial permit reevaluation has been combined with this Part 70 Permit renewal. This permit incorporates previous Part 70 revision permits (ATC/PTOs, PTOs, PTO Modifications, and Administrative Modifications) that have been issued since February 15, 2023. These permits are listed in Section 1.2.2 of this permit. Platform Heritage is a part of the *Sable Offshore-Santa Ynez Unit (SYU) Project* stationary source (SSID = 1482), which is a major source for VOC<sup>1</sup>, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>2.5</sub> and PM<sub>10</sub>. Conditions listed in this permit are based on federal, state or local rules and requirements. Sections 9.A, 9.B and 9.C of this permit are enforceable by the District, the USEPA and the public since these sections are federally enforceable under Part 70. 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. Conditions listed in Section 9.D are "District-only" enforceable.

Pursuant to the stated aims of Title V of the CAAA of 1990 (i.e., the Part 70 operating permit program), this permit has been designed to meet two objectives. First, compliance with all conditions in this permit would ensure compliance with all federally-enforceable requirements for the facility. Second, the permit would be a comprehensive document to be used as a reference by the permittee, the regulatory agencies and the public to assess compliance.

Tailoring Rule. This reevaluation incorporates greenhouse gas emission calculations for the stationary source. On January 20, 2011, the District revised Rule 1301 to include greenhouse gases (GHGs) that are "subject to regulation" in the definition of "Regulated Air Pollutants". District Part 70 operating permits are being updated to incorporate the revised definition.

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<sup>1</sup> VOC as defined in Regulation XIII has the same meaning as reactive organic compounds as defined in Rule 102. The term ROC shall be used throughout the remainder of this document, but where used in the context of the Part 70 regulation, the reader shall interpret the term as VOC.



The facility's potential to emit has been estimated, however the greenhouse gas PTE is not a new source review emission limit. The facility will not become subject to emission limits for GHGs unless a project triggers federal Prevention of Significant Deterioration requirements under Rule 810.

## 1.2. Facility Overview

1.2.1 Facility Overview: Sable Offshore Corporation (Sable) is the sole owner and operator of Platform Heritage, located in the Santa Ynez Unit on lease tract P-0182 approximately 25 miles west of the City of Santa Barbara (Lambert Zone coordinates x = 783933 feet, y = 818088 feet). The platform is situated in the Southern Zone of Santa Barbara County. Figure 1.1 shows the relative location of Platform Heritage off of the Santa Barbara County coast. The platform is operated by Sable which has a 100-percent working interest ownership.

Platform Heritage is an eight leg, 60 well slot platform that was installed in a water depth of 1075 feet during the 1989 to 1992 time frame. Drilling operations began in 1993. Platform Heritage produces sour natural gas and crude oil. The average gravity of the produced crude oil is 18-19° API. Emulsion and produced gas from Platform Heritage is shipped via subsea pipeline to Platform Harmony and then onto Sable's onshore processing facilities in Las Flores Canyon (LFC) approximately 20 miles west of Santa Barbara. Primary separation of the oil emulsion from the produced gas takes place on Platform Heritage. The oil emulsion is shipped via a 20-inch pipeline to the LFC facility from Platform Harmony. Gas produced on Platform Heritage is compressed and either used as fuel gas, re-injected or shipped onshore via a sub-sea gas pipeline to Platform Harmony. The design production rate for Platform Heritage is 75 thousand barrels of emulsion per day and 75 million standard cubic feet of produced gas per day. Primary power for the platform is supplied by an onshore 49 MW cogeneration power plant at LFC.

The *Sable Offshore – SYU Project* stationary source consists of the following five facilities:

- Platform Harmony (FID = 8018)
- Platform Heritage (FID = 8019)
- Platform Hondo (FID = 8009)
- Las Flores Canyon Oil and Gas Plant (FID = 1482)
- POPCO Gas Plant (FID = 3170)

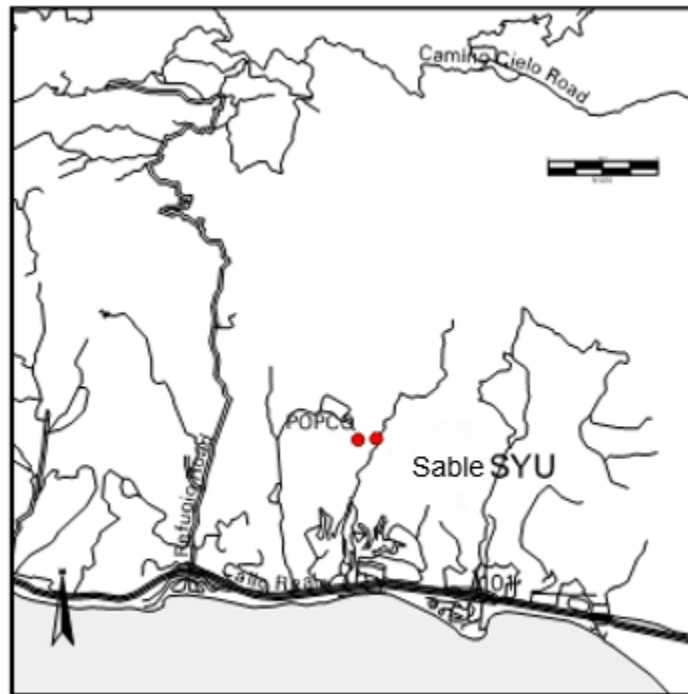


Figure 1.1 Location Map for Platform Heritage – Santa Ynez Unit Project (Onshore)

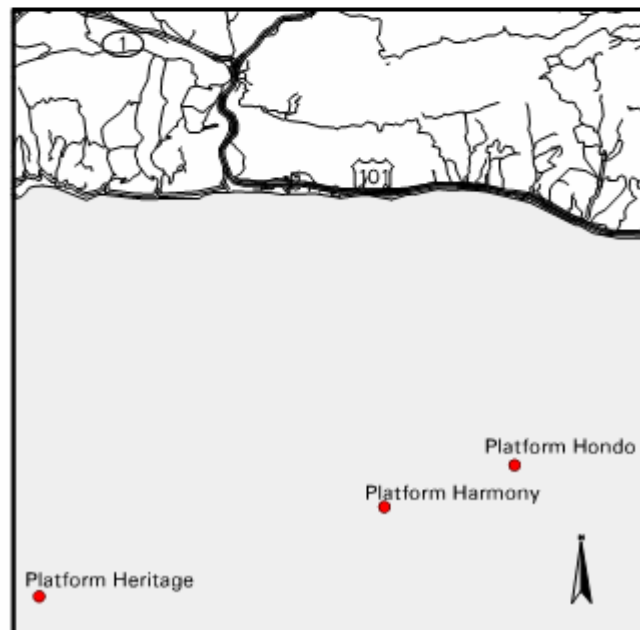


Figure 1.2 Location Map for Platform Heritage – Santa Ynez Unit Project (Offshore)

1.2.2 Facility Permitting History: The following permitting actions have taken place since September 30, 1993

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
ATC 09099	09/30/1993	See Permit
ATC Mod 09099 01	09/01/1994	See Permit
PTO 09102	09/04/1994	See Permit
PTO 09099	09/04/1994	See Permit
PTO Mod 09102 01	01/25/1995	Dedication of 20.68 tpy of SO <sub>x</sub> ERCs to comply with Rule 359 requirements
PTO Mod 09102 02	05/02/1996	Added condition No. 34 (Crew and Supply Boat Stationary Source Maximum Permitted Emissions and Operational Limits). The purpose was to redefine the stationary source's annual potential to emit.
ATC 09634	12/18/1996	Approved the installation and operation of a shipping gas compressor (CZZ-306). BACT and offsets were required. ROC emissions increased by 0.59 tpy.
PTO 09634	11/12/1997	Slight reduction in emissions from ATC 9634 for compressor skid unit, due to revised component count and revised control efficiencies. ATC 9651-01 provides ERCs.
ATC 09828	01/21/1998	Authorizes installation of pig launcher and associated FHC components and safety relief and blowdown system. Topsides tie-in to Heritage Gas Pipeline Project. Offsets provided by ATC/PTO 9826. ROCs: 0.05 lb/hr, 1.31 lb/day, 0.06 tpy, 0.24 tpy.
ATC/PTO 10038	01/07/1999	Authorized changes included the revision of project emission factors, reduction of permitted solvent emissions, updated fugitive hydrocarbon leak path inventory, revised the stationary source crew and supply boat potential to emit downward and modified the allowable number of pigging operations. NO <sub>x</sub> , ROC, CO, SO <sub>x</sub> , PM and PM <sub>10</sub> emissions decreased by 169 tpy, 60 tpy, 43 tpy, 38 tpy and 14 tpy respectively.
ATC/PTO 10169	09/21/1999	Authorized the use of larger crew and supply boats. Only short-term hourly and daily emissions increased. Through limitations of allowable fuel use, long term quarterly and annual emissions did not increase.
PT-70/Reeval 09102 R1	01/11/2000	Combined Reeval and Part 70 permit.
ATC 10182	06/08/2000	Phase II application to use larger crew and supply boats.
PTO 10348	12/13/2000	Temporary PTO for the use of the supply boat Santa Cruz for emergency maintenance of the buoy serving Platform Heritage. Also a Minor Part 70 Modification. See also PT-70 R 10372.
PT-70 R 10372	12/13/2000	Minor Part 70 Permit Modification. For temporary (14 days) use of the supply boat Santa Cruz to repair the Platform Heritage Buoy. See also District PTO 10348.
PTO Mod 09102 03	02/28/2001	Admin modification to replace the emergency IC engine permit condition to be consistent with Rule 202 requirements and the existing Platform Hondo permit. (see PT-70R 10396)
PTO 10182	04/23/2001	Permitting of larger supply boat (Santa Cruz, 4000 bhp) and crew boat (Callie Jean, 3800 bhp). Large increase in

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
		short-term PTE and no long-term PTE increase in ozone precursor pollutants.
ATC/PTO 10738	11/09/2001	Clarifies the allowable uses of crew and supply boats servicing Platform Heritage. Modifies the number of times the pig launchers/receivers can be used.
ATC/PTO 10800	05/20/2002	Reduces the amount of fuel that the crew boat main engines can use and increases the amount fuel that the crew boat auxiliary engines can use. Also, this permit clarifies for compliance purposes the dedicated project vessel and spot charter (combined) crew and supply boat main engine fuel use limits.
ATC/PTO 10993	05/19/2003	Allowed ExxonMobil to decrease their stationary source de minimis ROC emissions total by adding a portion to the stationary source NEI ROC total. The additional ROC NEI was offset by four ERC's generated due to various facility shutdowns.
PT-70/Reeval 09102 R2	05/19/2003	Triennial reevaluation of Part 70 PTO 9102 and consolidation of active permits.
ATC 11132	04/02/2004	High Pressure System Upgrade Project
ATC 11131	04/02/2004	Intermediate/Low Pressure System Upgrade Project
Exempt 11285	09/15/2004	Temporary Mooring Installation for Platforms Harmony, Heritage, and Hondo
ATC/PTO 11236	09/24/2004	Modifies the permitted supply boat engine profile to accommodate the M/V Pilot Tide as a project supply boat. In addition, new line items have been added for controlled auxiliary generator engines and uncontrolled auxiliary engines (winch). This permit also revises the fuel use limits in terms of "uncontrolled engine fuel use" and "controlled engine fuel use", rather than "main engines" and "auxiliary engines". This permit also modifies the recordkeeping requirements for unplanned flaring events by logging aggregate volume flared in place of logging individual unplanned events. ExxonMobil did not bring the M/V Pilot Tide to Santa Barbara County, so the Part 70/PTO 9102 R3 permit was only modified to include the winch engine on the M/V Santa Cruz.
PT-70 ADM 11334	10/26/2004	Change in responsible official from Sarah Ortwein to Hugh Thompson.
Exempt 11344	12/03/2004	Temporary equipment for HE Gas Expansion HP fireproofing project
Exempt 11343	12/03/2004	Temporary equipment for HE Gas Expansion HP blasting project
ATC Mod 11132 01	03/07/2005	Combined High Pressure and Intermediate/Low Pressure Gas Expansion Project
ATC Mod 11132 02	07/27/2005	Authorizes operation of the equipment installed under ATC 11132-01 and ATC 11132-02 for the Intermediate-Low Pressure Gas Expansion Project (IP/LP) and the High Pressure Gas Expansion Project (HP). This permit also includes an enhanced fugitive inspection and maintenance program as defined in ATC 11132-02.
PT-70 ADM 11770	08/23/2005	Change in responsible official from Hugh Thompson to Glenn Scott and Jon M. Gibbs

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
PTO 11132	09/30/2005	Operation of the HP and IP/LP gas installation permitted in ATC 11132 Mod-01. See PT-70 R 11356
PT-70/Reeval 09102 R3	05/22/2006	Triennial reevaluation of Part 70 PTO 9102 and consolidation of active permits.
PTO 11961	05/22/2006	Four diesel engines. Permitted due to loss of Rule 202 exemption. Limited to 200 hr/yr M&T operations. See Pt 70 R 11962
ATC 11986	05/23/2006	Authorizes the installation of new Tier II main propulsion and auxiliary diesel internal combustion engines on the <i>M/V Broadbill</i> crew boat. Also see DOI 0042
PTO 11986	08/16/2006	New Tier II main propulsion and auxiliary diesel internal combustion engines on the <i>M/V Broadbill</i> crew boat. Also see DOI 0042
PT-70 R 12121	09/25/2006	See PTO 11986
PT-70 ADM 12272	04/19/2007	Change in responsible official from Glenn Scott to James D. Siegfried.
PTO Mod 09102 04	07/10/2008	Cable C Repair Project near Platform Heritage. 25 day repair project with a specialized cable marine vessel.
ATC 13072	03/02/2009	Temporary installation and operation of a flare scrubber treatment system during turnaround activities to control emissions from depressurized vessels.
PT-70/Reeval 09102 R4	06/12/2009	Triennial reevaluation of Part 70 PTO 9102 and consolidation of active permits. Incorporated the three portable drilling engines previously exempt from permit prior to the 2008 Rule 202 revision.
ATC/PTO 13491	10/06/2011	Incorporate fugitive hydrocarbon components associated with projects completed as de minimis.
PT-70 ADM 13746	08/25/2011	This administrative amendment changed the responsible official from Frank Betts to Troy Tranquada.
ATC 13818	02/28/2012	Temporary installation and operation of a flare scrubber treatment system during turnaround activities to control emissions from depressurized vessels.
PTO 13818	02/28/2013	Installation and operation of a flare scrubber treatment system during turnaround activities to control emissions from depressurized vessels.
PT-70/Reeval 09102 R5	03/01/2013	Triennial reevaluation of Part 70 PTO 9102 and consolidation of active permits.
ATC Mod 14010 01	09/09/2013	Installation of an inline catalytic converter, closed crankcase ventilation system, back pressure and temperature monitor on a diesel-fired crane.
ATC 14147	10/30/2013	Install a new compression ignition engine to replace the existing Cuttings Reinjection Pump Engine used to assist with drilling operations.
ATC 14177	11/08/2013	Replace existing emergency response vessels with new emergency vessels equipped with low emission engines due to the retirement of the existing vessels.
PT-70 ADM 14392	04/25/2014	Change alternate responsible official from Mr. John Doerner to Mr. Keith Chiasson.
ATC Mod 14010 02	05/21/2014	Installation of an inline catalytic converter, closed crankcase ventilation system, back pressure and temperature monitor on a diesel-fired crane.

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
PTO 14010	12/10/2014	Operation of an inline catalytic converter, closed crankcase ventilation system, back pressure and temperature monitor on a diesel-fired crane.
PTO 14147	12/17/2014	Install a new compression ignition engine to replace the existing Cuttings Reinjection Pump Engine used to assist with drilling operations.
PTO 14177	01/21/2015	Replace existing emergency response vessels with new emergency vessels equipped with low emission engines due to the retirement of the existing vessels.
ATC Mod 14010 03	03/09/2015	Install the DCL America catalyst on the East Crane.
ATC/PTO 14442	04/17/2015	This permit authorizes the use of various vessels for a cable retrieval and installation associated with the Offshore Power System Reliability B (OPSRB) project. Vessels include a cable installation vessel (CIV), support tugs, crew and supply boats, and spot charters.
PT-70 ADM 14639	05/12/2015	Change designated responsible official from Troy Tranquada to Kartik Garg.
PTO Mod 14010 01	10/23/2015	Operation of an inline catalytic converter, closed crankcase ventilation system, back pressure and temperature monitor on a diesel-fired crane.
PT-70 ADM 14853	06/14/2016	Change alternate responsible official to Ken Dowd.
PT-70 ADM 14919	6/19/2016	Change designated responsible official from Kartik Garg to Jing Wan.
PT-70 ADM 15085	08/01/2017	Change designated alternate responsible official from Ken Dowd to Bryan Wesley.
PTO Mod 9102-06	04/26/2018	Modify recordkeeping and reporting requirements.
PT-70/Reeval 09102 R6	04/26/2018	Triennial reevaluation of Part 70 PTO 9102 and consolidation of active permits.
PT-70 ADM 15426	09/06/2019	Change designated alternate official from Bryan Wesley to Michael Vanderlinden
PTO Mod 9102-07	09/26/2019	Add permit conditions to address pipeline shutdown compliance issues
PT-70 ADM 15566	07/22/2020	Change designated responsible official from Jing Wan to Bryan S. Anderson.
PTO Mod 9102-08	02/15/2023	Update conditions associated with DOI 0042-01 replacing the <i>M/V Broadbill</i> with the <i>M/V Ryan T</i> .
PT-70 ADM 15701	02/15/2023	Change designated alternate responsible official from Michael Vanderlinden to Jeff S. Patterson
PTO Mod 9102-09	02/15/2023	Add NTE factors to supply vessel <i>M/V Adele Elise</i> .
PTO Mod 9102-10	02/15/2023	Update conditions associated with DOI 0042-01 replacing the <i>M/V Broadbill</i> with the <i>M/V Ryan T</i> and the <i>M/V Capt T Le</i> .
PT-70 ADM 16128	TBD**	Change of responsible official from Bryan S. Anderson to Nathan Franka.
PT-70 ADM 16241	TBD**	Change of responsible official from Nathan Franka to Trent Fontenot and Alternate Official from Jeff Patterson to Craig Landry.
Trn O/O 09102 01	TBD**	Transfer of operator from ExxonMobil Upstream Company to Sable Offshore, Corp.

\*\* Final permits issued at issuance of this permit

### **1.3. Emission Sources**

Air pollution emissions from Platform Heritage are the result of combustion sources, storage tanks and piping components, such as valves and flanges. Section 4 of the permit provides the District's engineering analysis of these emission sources. Section 5 of the permit describes the allowable emissions from each permitted emissions unit, the Platform as a whole, and also lists the potential emissions from non-permitted emission units.

The emission sources include the following:

- Crew, supply and emergency response boat engines
- Piping components (such as valves and flanges)
- Flare
- Helicopters
- Solvent cleaning
- Process heater
- IC engines

A list of all permitted equipment is provided in Section 10.4.

### **1.4. Emission Control Overview**

Air quality emission controls are utilized on Platform Heritage for a number of emission units to reduce air pollution. Additionally, the use of onshore generated electricity from the 49 MW Cogeneration Power Plant at Las Flores Canyon allows Platform Heritage to operate without large gas turbine-powered generators or compressors. The emission controls employed on the platform include:

- An Inspection and Maintenance program for detecting and repairing leaks of hydrocarbons from piping components, consistent with the requirements of Rule 331, to reduce hydrocarbon emissions by approximately 80 percent.
- Use of turbo charging, enhanced inter-cooling and 4° timing retard on the crew and supply boat main engines to achieve a NO<sub>x</sub> emissions rate of 8.4 g/bhp-hr or less.
- Use of oxidation catalysts and a closed crankcase ventilation system on the East crane engine to achieve a CO exhaust concentration of 49 ppmvd at 15% O<sub>2</sub> or reduce CO emissions by 70 percent.
- Use of USEPA Tier III certified compression ignition engine for the cuttings reinjection pump to achieve a NO<sub>x</sub> emission rate of 3.5 g/bhp-hr or less.
- Installing an electric motor drive on one of the two crane engines.
- An amine unit on the platform removes sulfur from the fuel gas used on the platform thereby reducing SO<sub>x</sub> emissions.

### **1.5. Offsets/Emission Reduction Credit Overview**

- 1.5.1 Offsets: Prior to the issuance of PTO 9102 (9/4/94), the permittee obtained ATC 9099 and ATC Modification 9099-1 for an amine fuel gas treating system. A ROC liability of 2.69 tpy was offset by securing 3.23 tpy of ERCs. Modifications permitted under ATC permits 9634 and 9828 required ROC offsets. Emission Reduction Credits (ERCs) in the amount of 0.67 tpy were secured for PTO 9634's offset liability of 0.56 tpy through PTO 9651 by the implementation of an enhanced I&M program at Las Flores Canyon. ERCs in the amount of 0.31 tpy were secured



for ATC 9828's offset liability of 0.26 tpy through ERC Certificate No. 0004-0103 by the implementation of an enhanced I&M program at Las Flores Canyon. The ROC offset requirements are detailed in Table 7.1.

Under PTO 9102-01, the permittee secured 20.68 tpy of SO<sub>x</sub> ERCs for Platform Heritage. These ERCs were created due to the shutdown of the OS&T vessel. The ERCs are required pursuant to Rule 359, from which the permittee obtained an exemption from the planned flaring sulfur content standard of 239 ppmv.

ATC/PTO 13491 incorporated existing fugitive emission component leakpaths, that were previously categorized as *de minimis* at Platform Heritage, into the total permitted fugitive component leak path inventory. This increased the ROC emissions from Heritage by 0.362 tons/quarter which were required to be offset.

- 1.5.2 Emission Reduction Credits: Per DOI 0039 Platform Heritage generated 0.115 TPQ ROC (0.459 TPY) due to the implementation of an enhanced fugitive inspection and maintenance program permitted under ATC 11132 Mod -01.

Emission Reduction Credits: Under DOI 042 the permittee generated 1.843 tpq (7.374 TPY) NO<sub>x</sub> and 0.072 tpq (0.287 TPY) PM/PM10 due to the replacement of the diesel main propulsion and auxiliary engines on the dedicated crew boat for the SYU project, the *M/V Broadbill* as permitted under ATC/PTO 11912.

On October 2, 2020, the permittee submitted the modification application DOI 042-02 to replace the *M/V Broadbill* with the repowered *M/V Ryan T*. As part of the application review, the District determined that the assumptions of DOI 042-01 were maintained with the use of the newly repowered *M/V Ryan T* and therefore the ERCs associated with the project are still valid. The *M/V Broadbill* is still listed as the emission basis for DPV vessels in this permit, however, use of the *M/V Ryan T* will satisfy the requirements of the DOI. On

August 16, 2021, the permittee submitted the modification application DOI 042-03 to replace the *M/V Broadbill* with the *M/V Capt T Le* in addition to the *M/V Ryan T*. As part of the application review, the District determined that the assumptions of DOI 042-01 were maintained with the use of the *M/V Capt T Le* and therefore the ERCs associated with the project are still valid. The *M/V Broadbill* is still listed as the emission basis for DPV vessels in this permit, however, use of the *M/V Ryan T* and *M/V Capt T Le* will satisfy the requirements of the DOI.

## 1.6. **Part 70 Operating Permit Overview**

- 1.6.1 Federally-Enforceable Requirements: All federally enforceable requirements are listed in 40 CFR Part 70.2 (*Definitions*) under "applicable requirements." These include all SIP-approved District Rules, all conditions in the District-issued Authority to Construct permits, and all conditions applicable to major sources under federally promulgated rules and regulations. All permits (and conditions therein) issued pursuant to the OCS Air Regulation are federally enforceable. All these requirements are enforceable by the public under CAAA. (*see Tables 3.1 and 3.2 for a list of federally enforceable requirements*)
- 1.6.2 Insignificant Emissions Units: Insignificant emission units are defined under District Rule 1301 as any regulated air pollutant emitted from the unit, excluding HAPs, that are less than 2 tons per year based on the unit's potential to emit and any HAP regulated under section 112(g) of the

Clean Air Act that does not exceed 0.5 ton per year based on the unit's potential to emit. Insignificant activities must be listed in the Part 70 application with supporting calculations. Applicable requirements may apply to insignificant units. See Attachment 10.4 for a list of Part 70 insignificant units.

- 1.6.3 Federal Potential to Emit: The federal potential to emit (PTE) of a stationary source does not include fugitive emissions of any pollutant, unless the source is: (1) subject to a federal NSPS/NESHAP requirement which was in effect as of August 7, 1980, or (2) included in the 29-category source list specified in 40 CFR 51.166 or 52.21. The federal PTE does include all emissions from any insignificant emissions units. (*See Section 5.4 for the federal PTE for this source*)
- 1.6.4 Permit Shield: The operator of a major source may be granted a shield: (a) specifically stipulating any federally-enforceable conditions that are no longer applicable to the source and (b) stating the reasons for such non-applicability. The permit shield must be based on a request from the source and its detailed review by the District. Permit shields cannot be indiscriminately granted with respect to all federal requirements. Although the permittee made a request for a permit shield, no permit shields were granted due to the broadness of the request.
- 1.6.5 Alternate Operating Scenarios: A major source may be permitted to operate under different operating scenarios, if appropriate descriptions of such scenarios are included in its Part 70 permit application and if such operations are allowed under federally-enforceable rules. The permittee made no request for permitted alternative operating scenarios.

The permittee lists their main operating scenario as: "Platform Heritage is an oil and gas production platform (SIC 1311). Its main products are crude emulsion and gas. The platform also produces byproducts from crude oil and gas production operations. Normal facility operations include periods of startup, shutdown and turnaround. Periodically, malfunctions may occur."

- 1.6.6 Compliance Certification: Part 70 permit holders must certify compliance with all applicable federally-enforceable requirements including permit conditions. Such certification must accompany each Part 70 permit application; and, be re-submitted annually on or before March 1<sup>st</sup> or on a more frequent schedule specified in the permit. Each certification is signed by a "responsible official" of the owner/operator company whose name and address is listed prominently in the Part 70 permit.
- 1.6.7 Permit Reopening: Part 70 permits are re-opened and revised if the source becomes subject to a new rule or new permit conditions are necessary to ensure compliance with existing rules. The permits are also re-opened if they contain a material mistake or the emission limitations or other conditions are based on inaccurate permit application data. This permit is expected to be re-opened in the future to address new monitoring rules, if the permit is revised significantly prior to its first expiration date. (*see Section 4.11.3, CAM Rule*).
- 1.6.8 Hazardous Air Pollutants (HAPs): Being an OCS source, the requirements of Part 70 permits also regulate emission of HAPs from major sources through the imposition of maximum achievable control technology (MACT), where applicable. The federal PTE for HAP emissions from a source is computed to determine MACT or any other rule applicability.

1.6.9 Responsible Official: The designated responsible official and their mailing address is:

Trent Fontenot  
Sable Offshore Corp.  
12000 Calle Real  
Goleta, CA 93117  
Telephone: (805) 567-9501

and

Craig Landry (VP Operations)  
Sable Offshore Corp.  
12000 Calle Real  
Goleta, CA 93117  
Telephone: (337) 249-2700

## 2.0 Process Description

### 2.1. Process Summary

Platform Heritage produces sour (with H<sub>2</sub>S) crude oil (oil/water emulsion) and gas. The design rate for the platform is 75,000 bopd of oil emulsion and 75 MMscfd of produced gas containing up to 30,000 ppmv H<sub>2</sub>S. The platform production equipment includes wells, pressure vessels, shipping pumps, transfer pumps, gas and refrigerant compressors, tanks, a glycol contactor and regenerator, a depropanizer, an amine contactor and still, a process heater, sumps, heat exchangers and coolers and pipeline pigging equipment. No separation of the produced oil and water emulsion takes place onboard the platform. All produced liquids are shipped to Platform Harmony and then onto Sable's Las Flores Canyon facility for dehydration via a 20-inch subsea pipeline. Produced gas containing H<sub>2</sub>S is separated from the produced liquids in the platform's gas/liquid separators and scrubbers. The gas on the platform is then compressed, dehydrated and refrigerated to remove heavy ends. The resulting gas can be combusted as fuel or compressed for re-injection or gas lift gas. No gas pipeline exists to transfer sales gas to the onshore gas plant. This facility was previously owned and operated by ExxonMobil Production Company until February 2024, when it was transferred to Sable.

The Monterey production flows to either the low pressure (LP) system or the intermediate pressure (IP) system based on Tubing Flowing Pressure and Gas Oil Ratio. The IP suction scrubber knocks out additional liquids prior to compression. The compressors accommodate three operating systems: LP (70 psig), IP (140 psig), and sandstone (350 psig). Due to Gas Injection Compressors (IGC) compression constraints (72 MSCFD), gas sales can be increased from Heritage platform to maintain POPCO loading.

The water injection capacity of 14 KBWD is used to maintain reservoir voidage/pressure. A water injection pump and expanded chemical injection skid are used to mitigate risk of downhole corrosion, bacterial formation, and scale build up.

The equipment installed for the IP/LP project connects to the existing drain, vent and flare systems on the platform as well as necessary utilities. For waste gas flaring, the operation of the meters on the main line has a range from 0.068 MMscfd to 125 MMscfd.

Gas is piped from the Sandstone production header through the High Pressure Production Header to either the HP Production Separator or the HP Test Separator. These separators operate at the flowing pressure of approximately 1,100 psig. The two separators function in the same manner as the existing Monterey separators except for the higher operating pressure. Production going to the HP Test Separator can also pass through the HP production exchanger, which uses hot oil as the heating medium to prevent hydrate formation. This heater will normally only be required during the initial start-up of the system. The HP Test Separator also contains a meter to determine the volume of the gas and emulsion production for accounting purposes. The liquid from the HP Test Separator will be transferred to the lower pressure Sandstone Test Separator for metering of the liquid and associated gas.

Saturated HP gas from the HP production and test separators are combined and sent to a HP Production Scrubber. The separator serves the purpose of removing any liquids in the gas prior to compression. The outlet gas from the separator is commingled with the existing dehydrated compressed gas at the suction to the Gas Injection Compressors (IGCs). The IP/LP project added a fuel gas tie-in prior to the separator to allow use of the low H<sub>2</sub>S gas for platform fuel use. The

tie-in to the new separator is downstream of the branch from the platform sales gas pipeline. The HP non-dehydrated gas does not enter the sales gas pipeline. Associated HP system liquids from the separators are commingled with existing Sandstone production at the Sandstone Production Separator (MBD-108). The liquids flow to the Sandstone Flash Separator (MBD-122) are either used as diluent or transferred to the Emulsion Surge Tank (MBD-110).

The recycle for the IGCs are routed to the new IGC suction scrubber to prevent wet gas from the IGCs from entering the sales gas pipeline. The system is designed for sour service due to the presence of sour gas from the IGC recycle stream. The take off for the recycle is downstream of the IGC Discharge Coolers (HBG-246/247), to allow the recycle gas to be cooled.

The High Pressure production system is designed for sour service excluding the well flow lines. Sour gas is expected to enter the HP production system downstream of the HP Production and Test Separators due to a modification to the IGC recycle flow. The platform operational flaring will not significantly change as a result of the project.

- 2.1.1 Production: The platform has 60 well slots. There are presently 47 well completions onboard the platform. Of the 47 completions, 42 are producing oil and gas (one well has dual completions of which one of the completions are currently producing with the other shut-in), three wells are used as a gas cap gas injection wells, and two are used as disposal wells. At this time, three of the wells are flowing, producing oil and gas without the aid of artificial recovery methods. The remaining 40 wells are produced by means of gas lift recovery.

The well bay contains four production manifolds and one gas injection manifold. Each production manifold contains the following headers:

- Monterey Production Header which sends the produced emulsion and gas from the wells to one of two Monterey Production Separators.
- Sandstone Production Header which sends produced emulsion and gas from the Sandstone and associated gas wells to the Sandstone Production Separator.
- High Pressure Production Header which was installed to connect to a potential future High Pressure Production Separator

HP Production Facilities System:

- *HP Manifolds* – Four (4) of the HP manifold slots are sized for maximum design flow rates of 20 MSCFD and 2,800 BLPD. Three (3) of the remaining HP manifold slots are sized for maximum design flow rates of 15 MSCFD and 2,800 BLPD. The three (3) HP manifold slots are tied to existing Sandstone wells are designed using 3" line size. The slots are used for 5,000-psig service equipment.
- *HP Production Header* – The HP Production Header is sized for maximum design flow rates of 60 MSCFD and 8,400 BLPD.
- *HP Production Separator* – Gas and liquid separation of the full well stream production from the high pressure wells occur in a horizontal, two-phase separator with a design capacity for 60 MSCFD and 8,400 BPD liquids at 1,155 psig. The separator provides two (2) minutes of retention time. The gas is metered out of the separator. A connection to the fuel gas system is taken off downstream to supply a design rate of 500 KSCFD to the fuel gas scrubber, MBF-120.

- *Gas Injection Compressor Scrubber* – Gas from the HP separators is commingled with the IGC recycle gas upstream of being scrubbed in a vertical, two-phase separator with a design capacity for 75 MSCFD and 1,500 BPD liquids at 1,140 psig. The scrubber is sized to provide 2 minutes of retention time. The gas from the scrubber flows to the IGC suction lines, with the tie-in downstream of the branch for gas to the sales pipeline.
- Monterey Test Header which sends the produced emulsion and gas from a well to one of two Monterey Test Separators.
- Sandstone Test Header which sends the produced emulsion and gas from one of the Sandstone or associated gas wells to the Sandstone Test Separator.
- High Pressure Test Header which was installed to connect to a potential future High Pressure Test Separator.

#### HP Test Facilities System:

- *HP Test Manifold* – Four (4) of the HP test manifold slots are sized for maximum design flow rates of 20 MSCFD and 2,800 BLPD. Three (3) of the remaining HP test manifold slots are sized for maximum design flow rates of 15 MSCFD and 2,800 BLPD. The three (3) HP test manifold slots that are tied to existing Sandstone wells are designed using 3" line size. Design is for 5,000-psig service equipment.
- *HP Test Header* – The HP Test Header is sized for maximum design flow rates of 20 MSCFD and 2,800 BLPD.
- *Start-Up Heat Exchanger* – A start-up gas heat exchanger is installed in the HP Test Header to assist with hydrate prevention when bringing on high flowing tubing pressure wells. There is a bypass around the exchanger for normal well testing. A choke is installed downstream of the exchanger. The exchanger is designed for 5,000-psig service. The heater has sufficient duty to heat 5 MSCFD of gas and 700 BPD of liquids from 50 °F to 112 °F, which is sufficient to maintain a temperature of 60 °F on the downstream production choke valve outlet. The platform hot oil system is the heat source for the exchanger.
- *HP Test Separator* – Gas and liquid separation for testing of the full well stream production from the high-pressure wells occurs in a horizontal, two-phase separator with a design capacity for 20 MSCFD and 2,800 BPD liquids at 1,155 psig. The separator provides 3 minutes of retention time. The gas production out of the HP test separator is metered. The liquid production is transferred to the Sandstone Test Separator for measurement of liquid and associated gas.
- *Production Manifolds* – The existing 6" future HP Production Header logs in production manifolds ZZZ-541, ZZZ-543 and ZZZ-544 are used for IP service. Both ends of the logs on manifolds ZZZ-541 and ZZZ-544 are connected to a new 14" IP Production Header.
- *IP Production Header* – A 14" IP Production Header flows the maximum design flow rates of 45 MSCFD and 17,000 BLPD @ 140 psig.
- Gas Lift Header which supplies each well with dehydrated and conditioned produced gas for gas lift.
- Chemical Batch Treatment Header which is used to periodically inject batch chemicals down a well.

- Well Cleanup Header which sends the produced emulsion and gas following an initial completion or a well workover to the Well Cleanup Separator.

The gas injection manifold is connected to up to three wells and supplies dehydrated and conditioned produced gas to the well for re-injection or back into the formation.

- 2.1.2 Gas/Emulsion Separation: All separators located on the platform are two phase (i.e., gas and liquid). Capacities of separators are as follows:

IP/LP Production, Separation, Compression, and Water Injection Systems:

- *IP Wells* —Seven existing wells are directed to the IP system (HE-1, -3, -4, -7, -9, -10, and -12).
- *IP Flow lines* - High flow rate IP wells HE-1, -3, -4, -7 and -10 require dual 4" or single 6"x4" flow lines to achieve 200 psig flowing tubing pressure. HE-1 and HE-4 flow lines have 4" branch connection tees; HE-3, HE-7 and HE-10 do not. Five additional manifold slots are utilized to dual these flow lines. HE-1 and HE-7 also has flow line choke changes installed.
- Monterey Production Separator (MBD-102): 50 kbpd emulsion; 40 MMscfd gas.
- *IP Production Separator* (MBD - 101): Monterey Production Separator MBD-101 is rated for pressure from 144 psig to 164 psig MAWP in accordance with API-510 and ASME Section VIII, Division 1.
- Monterey Test Separator (MBD - 104): 7.5 kbpd emulsion; 7.5 MMscfd gas.
- *IP Test Separator* – Monterey Test Separator MBD-103 is rated for pressure from 158 psig to 183 psig MAWP in accordance with API-510 and ASME Section VIII, Division 1.
- Sandstone Separator (MBD-108): 10 kbpd emulsion; 15 MMscfd gas
- Sandstone Test Separator (MBD-112): 2 kbpd emulsion; 6 MMscfd gas
- Well Cleanup Separator (MBD-113): 5 kbpd emulsion, 5 MMscfd gas.
- *IP Suction Scrubber* (MBF – 109): Gas from the IP Production and Test Separators is commingled with IP compressor recycle gas and flow to the IP Suction Scrubber (approximate dimensions of 54" ID x 12' S/S, 220 psig MAWP @ 325°F). The suction scrubber, MBF-109, is located on the cellar deck extension installed on the north side between truss rows 3 and 4. The deck extension is shared with the HP IGC Gas Suction Scrubber.
- *Water Injection* – The seawater Injection capacity is 14,000 BWPD. A 100± HP electric seawater injection pump boosts 10,000 BWPD from 50 to 500 psig for wells HE-21 and HE-26. A spare 100 HP motor from the pilot seawater injection pump may be used, if available. Plans are to continue injecting 4,000 BWPD into HE-13 from the 50-psig seawater source without boost to 500 psig.

All emulsion is routed to the Emulsion Surge Tank (MBJ-110). Sour gas is routed to the First Stage Suction Scrubber (MBF-114) where it is then compressed, dehydrated and conditioned and then further compressed for gas injection or gas lift. A side stream of conditioned sour gas is routed to the fuel gas treating unit where the gas is contacted with an amine solution to remove hydrogen sulfide. This sweet gas is then scrubbed and filtered prior to entering the platform fuel gas header.

There are four types of drain systems on the platform: Closed Drain, Deck/Open Drain, Glycol Drain and Amine Drain. The Closed Drain system collects hydrocarbon contaminated drainage from all of the process vessels, equipment and manifolds as well as selected skid and deck drains that have a high potential to contain hydrocarbons and/or chemicals. The liquids collect in the Closed Drain Sump (MBH-132) from where it is transferred by one of two pumps (PBH 363 or 364) to the Emulsion Surge Tank.

In general, the Deck/Open Drain System collects all production deck and cellar deck surface drainage as well as liquids from non-hydrocarbon atmospheric drains. All of the decks have kick plates which are seal welded around deck penetrations and the perimeter to prevent any fluids from spilling over. Any liquid spilled on the deck will collect in the deck drains and will then flow to the Open Drain Sump (ABH-406). Any hydrocarbons that may be present, however, are skimmed from the Open Drain sump and pumped to the Closed Drain System for eventual disposal in the oil production system, while water from the Open Drain Sump gravity flows to the Skim Pile for release to the ocean. The drilling deck drains are handled by a separate drain system tied to the Drill Deck Drain Settling Tank (ABJ-417) to prevent contamination of the oil production system. The solids settling tank separates the solids (drilling additives/solids and mud) from the liquids for disposal to the disposal caisson. The separated liquids flow by gravity to both the Open Drain Sump and the Skim Pile. The wellbay area has a separate sump (ABH-405) to collect surface drainage from the wellbay area. This drainage is pumped to the Drill Deck Drain Settling Tank.

The Glycol Drain System is a closed system which collects drainage from the Glycol Regeneration System equipment, the glycol contactor, and the Depropanizer Reboiler. The glycol drainage flows from a collection header to a sump from which it is pumped, filtered and returned to the Glycol Regeneration System. The Glycol Drain Sump is also used as a means for adding glycol makeup from tote tanks to the system.

The Amine Drain System is a closed system which collects drainage from the Amine Regeneration equipment and the Fuel Gas Scrubber (MBF-120). The amine drainage flows through a collection header to a sump from which it is pumped, filtered, and returned to the Amine Regeneration System. The Amine Sump is also used as means for adding amine make-up from tote tanks to the system.

- 2.1.3 Waste Water Treatment: A three phase separator, MBJ 110, removes produced water from the emulsion stream. Produced water may be sent to one pump and injected into the reservoir through disposal well HA 26. Water and crude oil from MBJ 110 are also sent to the shipping pumps.
- 2.1.4 Well Testing and Maintenance: In order to measure individual well production rates, production is directed to one of three test separators. The production test facilities allow for remote testing of any well. Liquids exiting the test separators flow to the Emulsion Surge Tank while sour gas is routed to the First Stage Suction Scrubber.

After a well workover is completed, the oil production from the well is started by producing the well to either a test separator or the Well Cleanup Separator (MBD-113). This segregates the well from the rest of the producing wells. Producing the well into a test separator prevents upsetting the normal production on the platform should the new well have unanticipated flow surges. Producing the well into the Well Cleanup Separator allows the lowering of the tubing



pressure to a level which will facilitate flow. Additionally, it will prevent the separators from being contaminated with material left in the well from the workover. This tank is equipped with a washout jet header system and ram-type drain valves to assist in solids removal. Following treatment in the Well Cleanup Separator, emulsion is routed to the Emulsion Surge Tank and gas to the First Stage Suction Scrubber.

- 2.1.5 Emulsion Breaking and Crude Oil Storage: Produced fluids are in the form of a tight oil/water emulsion which can be broken through the use of chemicals. Demulsifying chemicals can be injected both downhole and in the surface facilities, if required.

The Emulsion Surge Tank collects liquids from the two Monterey Test Separators, the two Monterey Production Separators, the Sandstone Production Separator, the Sandstone Test Separator, the STV Compression Suction Scrubber, the First Stage Suction Scrubber, the Well Cleanup Separator, the Amine Reflux Accumulator, the Glycol Hydrocarbon Separator and the Closed Drain Sump.

- 2.1.6 Crude Oil Shipping: Liquids are shipped from the Emulsion Surge Tank to Platform Harmony and then to Las Flores Canyon via a 20" subsea pipeline using one or more of the positive displacement screw type Emulsion Shipping Pumps (PAX-331, 332, 333) operated simultaneously to provide the desired flow capacity.

The pumps take suction from the Emulsion Surge Tank and pump the emulsion to pipeline discharge pressure which may vary from a few hundred psi to over 1000 psi, depending on throughput and emulsion properties. The liquid from the pumps is combined with recovered heavy ends from the conditioning unit (depropanizer) prior to being metered and sampled in the emulsion shipping ACT unit (ZAU-518) for production allocation and leak detection. This stream then enters the emulsion pipeline that contains a pig launcher on the platform. When a pig is being launched, the flow is directed through the emulsion pig launcher (KAH-791).

- 2.1.7 Gas Compression, Dehydration and Conditioning: The produced gas system is designed to collect and compress virtually all produced hydrocarbon vapors, dehydrate the compressed gas to a dew point of 40 °F, refrigerate the gas to recover propane and heavier hydrocarbon liquids, and sweeten a slip stream of gas prior to distribution as either sales and/or transport gas, gas lift gas, re-injection gas or platform fuel gas.

There are five stages of compression; Vent Recovery Compression, Surge Tank Vapor (STV) Compression, First Stage Main Gas Compression, Second Stage Main Gas Compression, and Gas Injection Compression. The first stage of compression, the Vent Recovery Compressor, takes gas at essentially atmospheric pressure and compresses it to an intermediate pressure of 15 psig. Other intermediate or interstage pressures are 72 psig (STV Discharge), 325 psig (First Stage Discharge), 1,100 psig (Second Stage Discharge), and 2,976 psig (Gas Injection Discharge). All compressors are electric motor driven reciprocating machines totaling 13,800 hp.

- Vent Recovery Compressor: A single Vent Recovery Compressor compresses all vapors from the 1 psig vent recovery header and the glycol regenerator. This compressor is a 50 hp rotary vane type with a discharge pressure of approximately 15 psig and a capacity of 0.5 MMscfd.
- Surge Tank Vapor (STV) Compressors: Two 100% STV Compressors compress the 15 psig gas from the emulsion surge tank, the gas from the vapor recovery compressor, and the acid gas from the amine regenerator to a discharge pressure of approximately 72 psig. The compressors are balanced opposed, two cylinder, single stage 900 RPM, 250 hp with a capacity of

1.04 MMscfd each. The STV compressor system includes two inlet coolers and a common suction scrubber.

- First and Second Stage - Main Gas Compressors: Four 25% First and Second Stage Main Compressors are provided. These compressors are six throw balanced opposed 900 RPM reciprocating type machines rated at 3500 hp each. Four cylinders (throws 3 through 6) serve as the "First Stage" Main Gas Compressor while the remaining two cylinders (throws 1 and 2) serve as the "Second Stage" Main Gas Compressor.
  - The First Stage of compression takes suction from the production separators and the STV compressors at approximately 72 psig and compresses the gas to a discharge pressure of approximately 325 psig in two stages without intercooling. Cylinders 4 and 6 compress the gas from 72 psig to approximately 175 psig while cylinders 3 and 5 compress the gas from 170 psig to 325 psig. The First Stage Main Gas Compressors are equipped with dual inlet coolers with a common suction scrubber and with dual outlet coolers with a common discharge scrubber. The total capacity of the first stage system is approximately 75 MMscfd. The compressed gas is conditioned by dehydration and refrigerated for heavy ends removal prior to returning to the Second Stage Main Gas Compressors.
  - The Second Stage Main Gas Compressors compress the treated gas stream from 300 psig to 1,100 psig in two stages without intercooling. The first stage of compression (cylinder 1) discharges at approximately 630 psig while the second stage (cylinder 2) discharges at 1,100 psig. The Second Stage Main Gas Compressors are equipped with a common suction scrubber and dual outlet coolers with a common discharge scrubber. The total capacity of the second stage compression is approximately 51 MMscfd (68 MMscfd with future unit addition). The high pressure gas from this system supplies the platform gas lift system, gas sales and/or transport (future) and the gas injection system.
- *IP Compressors* – Two of the MGC's (CZZ-304 and CZZ-305) had three of the six throws re-cylindered and converted to IP suction and Sandstone side stream service in the IP/LP project. IP compressor cylinders are 15.75" (2), 10.5" (2) and 9.5" (1). The 10.5" and 9.5" cylinders are new; the 15.75" cylinders were re-used. The modification increased the capacities of these two machines from 18 MSCFD at 70 psig to 24 MSCFD at 130 psig. The existing 3500 HP motors have sufficient power for IP service modifications. Four 11.5", two 11" and two 8.5" existing cylinders are now spares. The new 10.5" and 9.5" cylinders allow the compression horsepower to be loaded with 38 MSCFD of side stream (Sandstone) gas. The cylinders may be equipped with variable volume pockets. As a minimum, new pulsation bottles will be required for the new 10.5" and 9.5" cylinders.
- *LP Compressors* – Two of the MGCs (CZZ-303 and CZZ-306) remain in LP service. CZZ-303 has been upgraded from 3,500 HP to 5,400 HP and has a new 4160 V, 5,000 HP electric motor installed. A 5,000 HP motor starter is in the MCC lineup in Module BU building. CZZ-303 has new 20" (2), 18" (1), 10.5" (2) and 9" (1) cylinders, increasing the capacity of CZZ-303 from 18 MSCFD to 27 MSCFD of 70-psig gas. The cylinders may be equipped with variable volume pockets. Two 15.75", two 11.5", one 11" and one 8.5" cylinders will become spares. New pulsation bottles will be installed on all stages.
  - Main gas compressor CZZ-306 were not be modified; its capacity will remain at 18 MSCFD of 70 psig gas with existing cylinders 16"(2), 11.5"(2), 11"(1) and 8.5"(1).
  - Cooper has globally re-rated their Superior W76 frame to 5,400 HP provided all six throws are cylindered. With 60 psig, 80°F suction gas, the 2<sup>nd</sup> stage discharge temperatures of the LP compressors will increase from 290°F to 300-305°F. In the event

the Main Gas Compressors are running when depropanization is down, 4<sup>th</sup> stage discharge temperatures will increase from 250°F to 295°F at 1200 psig discharge pressure.

- Gas Injection Compressors: The Gas Injection Compressors consist of two 50% four cylinder, balanced opposed reciprocating type 900 RPM compressors rated at 1500 hp each. Gas is compressed from 1,100 psig to approximately 2,976 psig in a single stage of compression. The total capacity of the injection compressors is 55 MMscfd. The high pressure gas from this system supplies the platform gas lift system as well as the gas injection system.
  - Gas from the main gas compressor first stage is conditioned by routing the compressed gas through a TEG contactor for dehydration followed by a depropanizer to remove recoverable propane and heavier hydrocarbons. NGL's recovered in the gas conditioning process are routed to the emulsion pipeline.

2.1.8 Dehydration and Glycol Regeneration: A standard TEG contactor dehydrates saturated gas from the Main Gas Compressor First Stage Discharge Scrubber to a design water dew point of minus 40 °F. A filter upstream of the TEG Contactor helps control carryover of heavy hydrocarbons and particulates into the Contactor. Rich TEG from the Contactor is regenerated in the Glycol Still by heating the glycol solution to approximately 400 °F with heating oil and stripping with a small amount of fuel gas. Lean TEG from the regenerator reboiler is cooled and pumped back to the Contactor for dehydration of the gas stream. A sidestream of lean glycol is continuously recycled through a charcoal filter to remove hydrocarbons.

2.1.9 Depropanizer: The depropanizer recovers propane and heavier natural gas liquids (NGLs) from the dehydrated gas by cold temperature separation and fractionation. The dehydrated gas from the TEG Contactor is cooled in the Gas/Gas Exchanger and combined with the depropanizer overhead vapor prior to further cooling in the depropanizer condenser. The depropanizer operates as a conventional depropanizer with a bottoms reboiler and refrigerated overhead partial condenser. The depropanizer bottoms product is sub-cooled and pumped to emulsion pipeline pressure before commingling with the crude emulsion. Reflux for the depropanizer is generated by chilling the rich gas from the Gas/Gas Exchanger and depropanizer overhead vapor in the depropanizer condenser. The conditioned gas leaving the depropanizer Reflux Accumulator is heat exchanged with the dehydrated rich gas in the Gas/Gas Exchanger and then flows to the second stage of the Main Gas Compressors.

2.1.10 Gas Sweetening and Sulfur Recovery: The platform contains a gas sweetening unit to produce fuel gas for use on the platform. There is no sulfur recovery system on the platform.

Sweet fuel gas for the platform is produced from sour conditioned gas drawn off at the suction of the second stage of the Main Gas Compressors. The gas is sweetened in an Amine Contactor by countercurrent contacting with MDEA (Amine) solution to selectively remove H<sub>2</sub>S. The sweetened gas is scrubbed and heated to 100 °F and routed to the fuel gas system. The acid gas removed in the amine regeneration system is recycled to the STV compressor.

2.1.11 Vapor Recovery System: All vessels and tanks on the platform with the exception of nine atmospheric vessels (mainly chemical and lube storage) and three sumps (Open Drain, Skim Pile and Wellbay) are connected to either the gas gathering, vapor recovery or the flare header systems.

Vessels that operate at pressures above 50 psig relieve excess pressure through the PSVs to the flare header. The remaining vessels and tanks that are connected to one of the recovery systems

normally relieve through a PSV or vent directly to one of the vapor recovery systems that recycle gas to the platform gas compression system. The pressure relief valves only open during emergency situations or mandatory testing.

2.1.12 Heating and Refrigeration: The platform contains a recirculating hot oil system heated by a direct fired process heater and a mechanical refrigeration system that utilizes refrigerant compressors.

The Heating Oil System provides a heat source for the Glycol Regeneration Reboiler, the Amine Regeneration Reboiler, the Depropanizer Reboiler, Well Cleanup Separator, Closed Drain Sump, Monterey Production Heater and the Non-Associated Gas Well Stream Heater. The system consists of a heating oil surge tank, circulating pumps, supply and return headers, and a direct fired process heater. The system transfers heat from the heater to the process exchangers by circulating a heating media (Caloria HT43).

A closed cycle mechanical refrigeration system is used to cool and partially condense vapors in the Depropanizer and Glycol Contactor overhead. Process side temperatures range from minus 15 °F to minus 30 °F. The refrigeration system is designed for a minimum refrigerant evaporator temperature of minus 40 °F.

2.1.13 IP/LP Utility Systems:

- *Electrical Power*: A 4160V, 5,000 HP synchronous motor starter have been added to the MCC lineup in building BU. No other additional electrical loads are anticipated.
- *Instrument Air*: Several new small users (SDV's and a BDV) have been added to the system. The platform system has adequate capacity to handle the additional loads.

2.1.14 Waste Gas Flaring:

- *Flare System Design*: The Flare System is made up of the flare headers, a flare scrubber, a flare tip and an ignitor panel. The flare system collects the discharged fluids from all equipment relief valves, emergency back pressure control valves, and manual blowdown valves. The flare scrubber separates any liquid from the gas prior to burning at the flare tip. The separated liquid is automatically dumped into the closed drain system. Three constantly burning pilots evenly spaced around the flare tip provide a continuous ignition source for the discharged gases in all wind conditions.

Pressure relief devices are installed, as required by industry code design specifications, on all applicable pressure vessels, tanks, sumps, compressors, pumps, piping systems, pipelines and other designated components.

The flare measuring system on the platform consists of four separate flow meters to determine the volume of gas sent to the flare. The main line to the flare contains a high flow (FE-134-1) and low flow (FE 134-2) meter. The separate vent recovery system relief to the flare contains a low flow (FE 134-3) meter as well as low flow (FE 134-4) meter measuring the flow rate from the auxiliary distance pieces. The range of operations of the meters on the main line is from a maximum of 125 MMscfd to a minimum of 0.068 MMscfd while the vent recovery relief meter has a range of 0.56 to 0.001 MMscfd.

- *IP/LP Flare Tip* - Approximately a 49 psig pressure drop occurs across the existing Zink (Kaldair) Indair tip at a flow of approximately 125 MSCFD. The existing 40 psig rating of the tip bypass burst plate was increased to avoid nuisance replacements. The design of the existing flare tip provides a stable flame at all flow rates.
- *Meter* - The operation of the meters on the main line have a range from 0.068 MSCFD to 125 MSCFD.
- *Planned Flaring Scenarios*: Planned flaring events include, but are not limited to the following: pipeline blowdown, platform turnaround, BOEM safety tests, planned equipment shutdown and startup, well cleanup/blowdown and valve leakage. The four most common or routine planned flaring scenarios that occur on the platform are described below:
  - (1) During startup of specific units (i.e., the compression system), a manual purge may be performed to remove air from the system. This minimizes the possibility of having combustible gas mixtures in the process. This purge is performed with sweet fuel gas.
  - (2) During the shutdown of gas compressors and other pieces of equipment, Shut Down Valves (SDV's) close and automatic blow down valves (BDV's) open releasing pressure from the system. This is performed to augment safety as well as to comply with codes and regulations.
  - (3) During maintenance of specific equipment items, the systems are purged with nitrogen or sweet fuel gas and blown down to the flare system.
  - (4) During normal operations, sweet fuel gas is continuously used to purge the flare headers to prevent in-leakage of air.
- *Unplanned Flaring Scenarios*: Unplanned flaring events on the platform most commonly originate from platform safety trips and compressor safety trips that cause equipment shutdowns.
- *Temporary Flare Scrubbing System*: A gas scrubber system is used to control emissions of reactive organic compounds and hydrogen sulfide when the flare is shut down during platform turnarounds, or during other emergency situations when the flare must be shut down and blinded off. The gas scrubber system consists of one SulfaTreat canister for removal of H<sub>2</sub>S and two carbon canisters for removal of hydrocarbons. The canisters are connected in series.

## 2.2. **Support Systems**

2.2.1 Pipelines: Pipelines present on the platform are as follows:

- 12 inch export produced gas pipeline to Platform Harmony.
- 20 inch export emulsion pipeline to Platform Harmony.

2.2.2 Power Generation: Electrical power is provided to supply the platform electrical demand from the Las Flores Canyon Cogeneration facility or Southern California Edison (SCE) through a submarine cable from shore. The platform has a 900 kW, 480 Volt, 3 phase, 60 Hz, 1200 RPM diesel engine driven generator set to provide standby power for lighting, UPS system, control

room pressurization fans, survival capsules, quarters building, instrument/utility air compressor and firewater pump in case of a failure of power from shore.

The platform has a 120 Volt AC Uninterruptible Power Supply System (UPS). The system consists of two 125 Volt DC, 600 Amp battery chargers, one 125 Volt DC battery bank, one 50 KVA static inverter, one automatic static transfer switch, one manual bypass switch and various distribution panel boards.

The system supplies regulated and transient-free 120 volt AC power to the essential loads such as the Distributed Control System (DCS), fire and gas alarm system, nav-aids, platform emergency lights, communication equipment and crane obstruction lights. The system is sized to provide continuous power for eight (8) hours to the Nav-Aids system and for one (1) hour to all other loads after failure of normal power has occurred.

All loads are electrically driven with the exception of the following diesel driven equipment: one pedestal crane, one firewater pump, two air compressors used primarily for abrasive blasting, the emergency generator, and the auxiliary drilling generator and associated well service equipment. In addition, several air driven pumps are also operated on the platform.

- 2.2.3 Crew/Utility and Supply/Work Boats: Crew/Utility boats (hereinafter referred as “crew boats”) and Supply/Work boats (hereinafter referred to as “supply boats”) are used for a variety of purposes in support of the platform.

Crew boats typically average about 2-3 round trips per day between the platform and Ellwood or other piers or ports and are used for the following activities:

1. Load, transport (receipt, movement and delivery) and unload personnel, supplies, and equipment to and from the platforms and dock or pier locations for routine operations and special logistic situations, [Examples: transport of drilling/workover fluid, casing, specialty chemicals, cement or other supplies].
2. Support supply/work boat while it is working at the platforms, [Examples: hold supply boat in position and transfer equipment or supplies].
3. Operate boat engines to maintain boat positioning while working at the platforms, docks, or piers or in open waters.
4. Support operations in conjunction with maintenance and/or repairs on platform components, [Examples: mooring buoy, boat dock, structural supports, diving operations and cathodic protection equipment].
5. Support operations in conjunction with surveys of platform and subsea components including pipelines and power cables, [Examples: side scan sonar, ROV inspection, diving inspections and marine biological inspections].
6. Support operations in conjunction with drilling and workover operations, [Examples: perforation watch and marine safety zone surveillance].
7. Support/participate in oil spill drills and actual incidents. [Examples: deploying boom and recovery equipment, taking samples and personnel exposure measurements and other spill response activities].

8. Support/participate in safety, health, and emergency drills and actual incidents. [Examples: third party requests for assistance, medevac and platform evacuation as well as other safety and health activities,-fire and explosion, well control blowout, storm, vessel collision, bomb threat and terrorist and man overboard].
9. Provide standby boat services when required due to limitations of platform survival craft capabilities and/or platform personnel count.
10. Supply marine support services to accommodate activities by local, state and federal agencies and special industry / public interest groups when requested.
11. Conduct engine source compliance tests as required by the permits or other rules and regulations.
12. Perform vessel and boat maintenance as required.
13. Travel to safe harbor from platforms, dock or pier during extreme weather or other emergency situations.

Supply boats are also routinely used in support of platform activities. Supply boats make an average of 1 round trip per day between the platform and Port Hueneme or other ports during normal operations (i.e., no drilling or well repair). Supply boats may be use more frequently during periods of drilling or well repair: Supply boats may not use the Ellwood pier for transfer of personnel in place of a crew boat. Supply boats are used for the following activities:

1. Load, transport (receipt, movement and delivery) and unload personnel, equipment and supplies to and from the platforms and Port Hueneme or other ports during routine operations and to accommodate special logistic situations, [Examples: transport of drilling/workover fluid, casing, specialty chemicals, cement or other supplies to a dock or pier to accommodate special needs of a vendor].
2. Support supply/work boat while it is working at the platforms, [Examples: hold supply boat in position and transfer equipment or supplies].
3. Operate boat engines to maintain boat positioning while working at the platforms, docks, or piers or in open waters.
4. Support operations in conjunction with maintenance and/or repairs on platform components, [Examples: mooring buoy, boat dock, structural supports, diving operations and cathodic protection equipment].
5. Support operations in conjunction with surveys of platform and subsea components including pipelines and power cables, [Examples: side scan sonar, ROV inspection, diving inspections and marine biological inspections].
6. Support operations in conjunction with drilling and workover operations, [Examples: perforation watch and marine safety zone surveillance].
7. Support/participate oil spill incident drills and actual incidents, [Examples: deploying boom and recovery equipment, taking samples and personnel exposure measurements as well as other spill response activities].
8. Support/participate in safety, health, and emergency drills and actual incidents, [Examples: third party requests for assistance, medevac and platform evacuation, safety and health activities, third party requests, fire and explosion, well control blowout, storm, vessel collision, bomb threat and terrorist and man overboard].

9. Provide standby boat services when required due to limitations of platform survival craft capabilities and/or platform personnel count.
10. Supply marine support services to accommodate activities by local, state and federal agencies and special industry/public interest groups when requested.
11. Conduct engine source compliance tests as required by the permits or other rules and regulations.
12. Perform vessel and boat maintenance as required.
13. Travel to safe harbor from platforms, dock or pier during extreme weather or other emergency situations.

2.2.4 Helicopters: Helicopter use currently averages about 2-3 round trips per day between the platform and the Santa Barbara Airport.

### **2.3. *Drilling Activities***

2.3.1 Drilling: The drill rig on the platform is being used to complete the initial development drilling program that began in 1993. The rig is also used to perform well workover procedures. The rig, and related equipment, such as the drilling mud system, was specially designed for use on the platform. The mud equipment includes pumps, degasser, mud pits and related components. The mud fluid has an ROC content of less than 10 percent by weight. The major components on the drill rig, including the derrick and the superstructure, are maintained on the platform and are idle during non-drilling periods. The drilling rig and much of the associated equipment required for drilling are powered by electrical motors supplied from the platform systems. Emergency power is supplied from the 2,307 bhp diesel engine driven Auxiliary Drilling Generator. Drilling activities also include use of a 450 bhp, Tier 3, diesel-fired cuttings reinjection pump.

2.3.2 Well Workover: The permittee periodically performs well workovers.

2.3.3 Enhanced Recovery: Enhanced oil recovery techniques are not currently employed on the platform.

### **2.4. *Maintenance/Degreasing Activities***

2.4.1 Paints and Coatings: Maintenance painting on the platform is conducted on a continuing basis. Normally only touch-up and equipment labeling/tagging is done with cans of spray paint. Solvents are also used as coating thinners.

2.4.2 Solvent Usage: Solvents not used for surface coating thinning may be used on the platform for daily operations. Usage includes cold solvent degreasing and wipe cleaning with rags.

### **2.5. *Planned Process Turnarounds***

Process turnarounds on platform equipment are normally scheduled to occur as part of an integrated SYU operation that takes into account both offshore and onshore requirements. Major pieces of equipment such as gas compressors undergo maintenance as specified by the manufacturer. Maintenance of critical components is carried out during planned turnarounds according to the requirements of Rule 331 (*Fugitive Emissions Inspection and Maintenance*). The emissions associated with planned process turnarounds are incorporated in the emissions category for planned flaring.



During process turnarounds, a gas scrubber system may be used to control emissions from the flare gas header when there is no active production on the platform and the flare is out of service for maintenance and repair. The gas scrubber system is designed to control any residual vapors after equipment has been depressurized and the flare has been shut down. Two carbon canisters in series are used to remove hydrocarbons and one SulfaTreat canister is used to remove hydrogen sulfide.

**2.6. Other Processes**

The permittee has stated that no other processes exist that would be subject to permit.

**2.7. Detailed Process Equipment Listing**

Refer to Attachment 10.4 for a complete listing of all permitted and exempt emission units.

### 3.0 Regulatory Review

This Section identifies the federal, state and local rules and regulations applicable to Platform Heritage.

#### 3.1. Rule Exemptions Claimed

⇒ District Rule 202 (*Exemptions to Rule 201*): The permittee qualifies for a number of exemptions under this rule. An exemption from permit, however, does not necessarily grant relief from any applicable prohibitory rule. The following exemptions were approved by the District:

Rule Section	Equipment Description	Operator ID	District Device No
L.1	11 Cellar Deck Heat Exchangers		107690
L.1	12 Cellar Mezzanine Heat Exchangers		107691
L.1	8 Production Deck Heat Exchangers		107692
L.1	2 STV Compressor Suction Coolers	HBG-219, -220	107693
L.1	2 Production Mezzanine BX Heat Exchangers	HBG-231, -234	107694
L.3	Refrigerant compressors	CZZ-328, 329	102543
U.2.a	Remote reservoir cold solvent cleaner		108169
V.1	Anti-foam storage tank	ABJ-415	102541
V.2	Diesel fuel #2 storage tank	ABJ-401	102537
V.3	Compressor lube oil storage tank	ABJ-421	103964
V.3	Compressor lube oil storage tank	ABJ-424	102542
V.3	Compressor lube oil storage tank	ABJ-427	103963

- As of April 10, 2024, the *de minimis* increases (per Section D.6) are:

	ROC (lb/day)
POPCO	0.3999
LFC	0.0050
Platform Harmony	2.1734
Platform Heritage	5.7401
Platform Hondo	1.0476
<b>Entire Source:</b>	<b>9.3660</b>

- Specialty equipment such as temporary engines are used to support drilling and well workover activities. These engines are typically operated under the provisions of Rule 202.F.2 or 202.F.5. Applicability of permit requirements and associated controls for temporary engines are determined according to the rules in effect at the time of use.

⇒ District Rule 331 (*Fugitive Emissions Inspection and Maintenance*): The following exemptions were applied for and approved by the District:

- Section B.2(c) for one-half inch and less stainless steel tubing fittings.
- Section B.3(c) for PRDs vented to a closed system.
- Section B.3(c) for components totally enclosed or contained.
- Section B.2.b for components buried below the ground.

- Section B.3.b for components handling liquids or gases with ROC concentrations less than 10 percent by weight.
- Sections F.1, F.2 and F.7 for components that are unsafe-to-monitor, as documented and established in a safety manual or policy, and with prior written approval of the Control Officer.

⇒ District Rule 325 (*Crude Oil Production and Separation*): The following equipment are exempt from the requirements of Sections D.1 and D.2 pursuant to Section B.3:

- Drill Deck Drains Settling Tank (ABJ-417, District Device No 5368)
- Wellbay Drain Sump (ABH-405, District Device No 5365)
- Open Drain Sump (ABH-406, District Device No 5364)
- Skim Pile (ABH-416, District Device No 5367)

The following equipment are exempt from the requirements of Sections D, E, F.4 and H pursuant to Section B.5:

- Closed Drain Sump (MBH-132, District Device No 5363)
- Emulsion Surge Tank (MBH-110, District Device No 107171)
- Amine Sump (MBH-170, District Device No 5366)

⇒ District Rule 359 (*Flares and Thermal Oxidizers*): Under Section D.1.b, the permittee has obtained District approval to comply with the exemption from Section D.1.a requirements and has offset all excess SO<sub>x</sub> emissions at a ratio of 1:1. Unplanned flaring is exempt from the sulfur standards of this rule.

### 3.2. **Compliance with Applicable Federal Rules and Regulations**

3.2.1 40 CFR Parts 51/52 {New Source Review (Nonattainment Area Review and Prevention of Significant Deterioration)}: Platform Heritage was constructed and permitted prior to the applicability of these regulations. However, all permit modifications as of September 4, 1992 are subject to District NSR requirements. Compliance with District Regulation VIII (*New Source Review*), ensures that future modifications to the facility will comply with these regulations.

3.2.2 40 CFR Part 55 {OCS Air Regulation}: The permittee is operating Platform Heritage in compliance with the requirements of this regulation.

3.2.3 40 CFR Part 60 {New Source Performance Standards}: The following engines on the platform are subject to 40 CFR 60 Subpart IIII: B-Side Cement Pump, the C-Side Cement Pump, and the Cuttings Reinjection Pump. The B-Side and C-Side Cement Pumps are 2006 model year Tier 3 IC engines. The use of tier-certified IC engines demonstrates compliance with the emission limits of the NSPS. For the Cuttings Reinjection Pump compliance with 40 CFR 60.4201(a), 60.4204(b), and 60.4211(c) is demonstrated through the installation of a new, 2012 model, Tier 3 compression ignited engine which meets the performance requirements of 40 CFR 89.112 and 89.113. The permittee has stated that CARB ultra-low sulfur diesel fuel will continue to be used in order to comply with 40 CFR 60.4207(b). The engines must be operated and maintained according to the manufacturer's emission-related written instructions. Only emission-related settings permitted by the manufacturer may be changed.

- 3.2.4 CFR 60 Subpart OOOO {Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution} This subpart does not apply to operations in the outer continental shelf (OCS). As defined in 60.5365, this regulation applies to owners and operators of “onshore affected facilities”. The OCS is specifically excluded from the definition of onshore as found in section 60.5430.
- 3.2.5 40 CFR Part 61 {NESHAP}: None of the equipment in this permit are subject NESHAP requirements.
- 3.2.6 40 CFR Part 63 {MACT}: On June 17, 1999, EPA promulgated Subpart HH, a National Emission Standards for Hazardous Air Pollutants (NESHAP) for Oil and Natural Gas Production and Natural Gas Transmission and Storage. The permittee has submitted HAP calculations that show each of these facilities qualifies an area source (not a major source), and thus are not subject to the MACT. This is based on the definitions of “facility” and “major source” in the MACT. The data shows that each platform has less than 10 TPY combined HAPs.
- 3.2.7 40 CFR Part 63 Maximum Achievable Control Technology (MACT) Standards Subpart ZZZZ - The revised National Emission Standard for Hazardous Air Pollutants (NESHAP) for reciprocating internal combustion engines (RICE) was published in the Federal Register on January 18, 2008. An affected source under the NESHAP is any existing, new, or reconstructed stationary RICE located at a major source or area source.

Existing non-emergency non-black start compression ignition RICE were required to comply with the applicable emission and operating limits by May 3, 2013. The East Pedestal Crane is subject to this requirement.

The following operating requirements apply to the East Crane engine (ID 5350) which is rated between 300 and 500 bhp:

- (1) Limit concentration of CO in the exhaust to 49 ppm<sub>vd</sub> @ 15 percent O<sub>2</sub>; or
- (2) Reduce CO emissions by 70 percent or more.

The permittee installed oxidation catalysts under Authority to Construct Nos. 14010-01, 14010-02 and 14010-03 to comply with the 49 ppm<sub>vd</sub> at 15 percent oxygen limit. A closed crankcase ventilation system was also installed to further control engine emissions in order to demonstrate compliance with the RICE MACT.

The following applies to the Cuttings Reinjection Pump engine on Platform Heritage: According the RICE NESHAP, the cutting reinjection pump engine is a new, non-emergency, non-black start CI stationary engine rated between 300 and 500 bhp that is located at an area source of HAP emissions. As specified in 40 CFR 63 Subpart ZZZZ 63.6590(c), an affected source which meets the criteria of 40 CFR 60 Subpart III is not subject to further requirements under Subpart ZZZZ.

Notifications are not required for existing stationary emergency RICE.

Existing emergency standby compression ignition RICE must comply with the applicable operating limits. The following engines on the platform are subject to this requirement: Emergency Production Generator (ID 5371), Emergency Drilling Generator (ID 5370),

Emergency Firewater Pump PBE-357 (ID 5372), and Emergency Firewater Pump PBE-367 (ID 007143). The following operating requirements apply:

- (1) Change the oil and filter every 500 hours of operation or annually, whichever comes first;
- (2) Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first;
- (3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first.

For any engine subject to oil change requirements, the owner or operator has the option of utilizing an oil analysis program in order to extend the specified oil change interval.

New stationary RICE that are subject to 40 CFR 60 Subpart IIII are not subject to any further requirements under 40 CFR 63 Subpart ZZZZ. The following engines on the platform are subject to 40 CFR 60 Subpart IIII, so they are not subject to any further requirements under this NESHAP: B-Side Cement Pumping Skid (ID 112508) and the C-side Cement Pumping Skid (ID 112507).

- 3.2.8 40 CFR Part 64 {Compliance Assurance Monitoring}: This rule became effective on April 22, 1998. At the time of this Part 70 permit renewal the requirements of Part 64 were not applicable to Platform Heritage. The platform does not have any equipment, which uncontrolled would exceed 100 TPY of any criteria pollutant.
- 3.2.9 40 CFR Part 70 {Operating Permits}: This Subpart is applicable to Platform Heritage. Table 3.1 lists the federally-enforceable District promulgated rules that are “generic” and apply to Platform Heritage. Table 3.2 lists the federally-enforceable District promulgated rules that are “unit-specific”. These tables are based on data available from the District’s administrative files and from the permittee’s Part 70 Operating Permit application.

In its Part 70 permit application (Forms I and J), the permittee certified compliance with all existing District rules and permit conditions. This certification is also required of the permittee semi-annually. Issuance of this permit and compliance with all its terms and conditions will ensure that the permittee complies with the provisions of all applicable Subparts.

### **3.3. Compliance with Applicable State Rules and Regulations**

- 3.3.1 Division 26. Air Resources {California Health & Safety Code}: The administrative provisions of the Health & Safety Code apply to this facility and will be enforced by the District. These provisions are District-enforceable only.
- 3.3.2 California Administrative Code Title 17 {Sections 92000 – 92450}: These sections specify the standards by which abrasive blasting activities are governed throughout the State. All abrasive blasting activities at Platform Heritage are required to conform to these standards. Compliance will be assessed through onsite inspections. These standards are District-enforceable only. However, CAC Title 17 does not preempt enforcement of any SIP-approved rule that may be applicable to abrasive blasting activities.
- 3.3.3 Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition (CI) Engines (CCR Section 93115, Title 17): This ATCM applies for all stationary diesel-fueled engines rated over 50 brake horsepower (bhp) at this facility. On March 17, 2005, District Rule 202 was revised to remove the compression-ignited engine (e.g. diesel) permit exemption for units rated over 50 bhp to allow the District to implement the State’s ATCM for Stationary Compression

Ignition Engines. Compliance shall be assessed through onsite inspections and reporting. The operating requirements and emission standards outlined in the ATCM do not apply to stationary diesel-fueled engines solely used on the OCS. However these OCS engines are required to meet fuel, recordkeeping, reporting, and monitoring requirements outlined in the ATCM. On January 30, 2006 the DICE ATCM was incorporated into 40 CFR Part 55, making the requirements of the DICE ATCM federally enforceable in the OCS.

- 3.3.4 California Administrative Code Title 17 {Sections 93118.5}: This section requires diesel-powered harborcraft to meet certain emission standards and operational requirements. New vessels brought into California must comply with this regulation immediately, while existing vessels must meet the compliance dates specified in the regulation.

### **3.4. Compliance with Applicable Local Rules and Regulations**

- 3.4.1 Applicability Tables: In addition to Tables 3.1 and 3.2, Table 3.3 lists the non-federally enforceable District promulgated rules that apply to Platform Heritage.
- 3.4.2 Rules Requiring Further Discussion: This section provides a more detailed discussion regarding the applicability and compliance of certain rules.

The following is a rule-by-rule evaluation of compliance for Platform Heritage:

*Rule 201 - Permits Required*: This rule applies to any person who builds, erects, alters, replaces, operates or uses any article, machine, equipment, or other contrivance which may cause the issuance of air contaminants. The equipment included in this permit is listed in Attachment 10.4. An Authority to Construct is required to return any de-permitted equipment to service.

*Rule 210 - Fees: Pursuant to Rule 201.G*: District permits are reevaluated every three years. This includes the re-issuance of the underlying permit to operate. Fees for this facility are recovered under the cost reimbursement provisions of this rule.

*Rule 301 - Circumvention*: This rule prohibits the concealment of any activity that would otherwise constitute a violation of Division 26 (Air Resources) of the California H&SC and District rules and regulations. To the best of the District's knowledge, the permittee is operating in compliance with this rule.

*Rule 302 - Visible Emissions*: This rule prohibits the discharge from any single source any air contaminants for which a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade than a reading of 1 on the Ringelmann Chart or of such opacity to obscure an observer's view to a degree equal to or greater than a reading of 1 on the Ringelmann Chart. Sources subject to this rule include: the flare, the Central Process Heater and all diesel-fired piston internal combustion engines on the platform. Improperly maintained diesel engines have the potential to violate this rule. Compliance will be assured through Visible Emissions Monitoring per condition 9.B.2 by facility staff and requiring all engines to be maintained according to manufacturer maintenance schedules per the District-approved *IC Engine Particulate Matter Operation and Maintenance Plan*.

*Rule 303 - Nuisance*: This rule prohibits the OCS operator from causing a public nuisance due to the discharge of air contaminants. This rule does not apply to the platform since it is not included in the OCS Air Regulation.

*Rule 305 - Particulate Matter - Southern Zone:* Platform Heritage is considered a Southern Zone source. This rule prohibits the discharge into the atmosphere from any source particulate matter in excess of specified concentrations measured in gr/scf. The maximum allowable concentrations are determined as a function of volumetric discharge, measured in scfm, and are listed in Table 305(a) of the rule. Sources subject to this rule include: the flare, the Central Process Heater and all diesel-fired IC engines on the platform. Improperly maintained diesel engines have the potential to violate this rule. Compliance will be assured by requiring all engines to be maintained according to manufacturer maintenance schedules. Rule 359 addresses the need for the flare to operate in a smokeless fashion.

*Rule 309 - Specific Contaminants:* Under Section "A", no source may discharge sulfur compounds and combustion contaminants in excess of 0.2 percent as SO<sub>2</sub> (by volume) and 0.3 gr/scf (at 12% CO<sub>2</sub>) respectively. Sulfur emissions due to flaring of sweet gas will comply with the SO<sub>2</sub> limit. All diesel powered piston IC engines have the potential to exceed the combustion contaminant limit if not properly maintained (see discussion on Rule 305 above for compliance).

*Rule 310 - Odorous Organic Sulfides:* This rule prohibits the discharge of H<sub>2</sub>S and organic sulfides that result in a ground level impact beyond the property boundary in excess of either 0.06 ppmv averaged over 3 minutes and 0.03 ppmv averaged over 1 hour. No measured data exists to confirm compliance with this rule, however, all produced gas from Platform Heritage is collected for sales, re-injection or is collected by vapor recovery (i.e., no venting occurs). As a result, it is expected that compliance with this rule will be achieved. Further, the District has not recorded any odor complaints from this facility.

*Rule 311 - Sulfur Content of Fuels:* This rule limits the sulfur content of fuels combusted on Platform Heritage to 0.5 percent (by weight) for liquids fuels and 15 gr/100 scf (calculated as H<sub>2</sub>S) {or 239 ppmvd} for gaseous fuels. All piston IC engines on the Platform Heritage and on the crew and supply boats are expected to be in compliance with the liquid fuel limit since they are required to use CARB diesel fuel with 0.0015% sulfur content. The Central Process Heater is expected to be in compliance with the gaseous fuel limit as determined by an in-line hydrogen sulfide analyzer for the natural gas and fuel analysis documentation for the propane. The flare relief system is not subject to this rule (see discussion under Rule 359).

*Rule 317 - Organic Solvents:* This rule sets specific prohibitions against the discharge of emissions of both photochemically and non-photochemically reactive organic solvents (40 lb/day and 3,000 lb/day respectively). Solvents may be used on the platform during normal operations for degreasing by wipe cleaning and for use in paints and coatings in maintenance operations. There is the potential to exceed the limits under Section B.2 during significant surface coating activities. The permittee will be required to maintain records to ensure compliance with this rule.

*Rule 318 - Vacuum Producing Devices or Systems – Southern Zone:* This rule prohibits the discharge of more than 3 pounds per hour of organic materials from any vacuum producing device or system, unless the organic material emissions have been reduced by at least 90 percent. The permittee has stated that there is no equipment subject to this rule.

*Rule 321 - Solvent Cleaning Operations:* This rule sets equipment and operational standards for degreasers using organic solvents. There is one remote reservoir degreasing unit (cold solvent cleaning) on the platform. This unit is exempt from all provisions of this rule with the exception of Section G.2 (requirement to keep the unit covered at all times when not in use). Degreaser compliance and solvent use will be determined through District inspection and the operating and recordkeeping requirements of the rule.

*Rule 322 - Metal Surface Coating Thinner and Reducer:* This rule prohibits the use of photochemically reactive solvents for use as thinners or reducers in metal surface coatings. The permittee will be required to maintain records during maintenance operations to ensure compliance with this rule.

Rule 323.1 (Architectural Coatings): This rule sets the standards for any architectural coating that is supplied, sold, offered for sale, or manufactured for use within the District.

*Rule 324 - Disposal and Evaporation of Solvents:* This rule prohibits any source from disposing more than one and a half gallons of any photochemically reactive solvent per day by means that will allow the evaporation of the solvent to the atmosphere. The permittee will be required to maintain records to ensure compliance with this rule. Solvents used during operations (e.g., for degreasing and wipe cleaning) will be limited to the non-photochemically reactive type.

*Rule 325 - Crude Oil Production and Separation:* This rule, adopted January 25, 1994, applies to equipment used in the production, processing, separation, gathering, and storage of oil and gas prior to custody transfer. The primary requirements of this rule are under Sections D and E. Section D requires the use of vapor recovery systems on all tanks and vessels, including waste water tanks, oil/water separators and sumps. Section E requires that all produced gas be controlled at all times, except for wells undergoing routine maintenance. Production and test separators are all connected to gas gathering systems and relief valves are connected to the flare relief system. Compliance with Section E is met by directing all produced gas to sales, injection, gas lift or to the flare relief system.

*Rule 326 - Storage of Reactive Organic Compound Liquids:* This rule applies to equipment used to store reactive organic compound liquids with a vapor pressure greater than 0.5 psia. There is no platform equipment subject to this rule.

*Rule 327 - Organic Liquid Cargo Tank Vessel Loading:* There are no organic liquid cargo tank loading operations associated with Platform Heritage.

*Rule 328 - Continuous Emissions Monitoring:* This rule details the applicability and standards for the use of continuous emission monitoring systems (CEMS). Per Section B.2, the SYU stationary source emits to the atmosphere more than 5 lb/hr of non-methane hydrocarbons, oxides of nitrogen and sulfur oxides and more than 10 lb/hr of particulate matter, thereby triggering the Section C.2 requirement that the need and application of CEMs be evaluated. An in-line hydrogen sulfide analyzer is required on the fuel gas line to the Central Process Heater to ensure compliance with permitted emission limits and Rule 311.



*Rule 330 - Surface Coating of Metal Parts and Products:* This rule sets standards for many types of coatings applied to metal parts and products. In addition to the ROC standards, this rule sets operating standards for application of the coatings, labeling and recordkeeping. It is not anticipated that the permittee will trigger the requirements of this rule. Compliance shall be based on site inspections.

*Rule 331 - Fugitive Emissions Inspection and Maintenance:* This rule applies to components in liquid and gaseous hydrocarbon service at oil and gas production fields. The permittee has submitted and received final approval for a *Fugitive Inspection and Maintenance Plan*. Ongoing compliance with the many provisions of this rule will be assessed via platform inspection by District personnel using an organic vapor analyzer and through analysis of operator records. Platform Heritage does not perform any routine venting of hydrocarbons to the atmosphere.

*Rule 333 - Control of Emissions from Reciprocating Internal Combustion Engines:* This rule applies to all engines with a rated brake horsepower of 50 or greater. The emergency standby IC engines at the facility include two firewater pump engines and one generator that are no longer exempt from permit. However, they are compression ignition emergency standby engines and are exempt from the provisions of the Rule per Section B.1.d. The diesel-fired pedestal crane engine, the diesel fired cement pumps and the cuttings reinjection pump engines are subject to the NO<sub>x</sub>, ROC, and CO standards under Section E.4. The revised Rule became effective on the OCS on November 21, 2008. Ongoing compliance will be achieved through implementation of the District-approved *Maintenance Plan* required under Section F and through source testing as applicable.

*Rule 342 - Boilers, Steam Generators, and Process Heaters (5MMBtu/hr and greater):* This rule sets emission standards for external combustion units with a rated heat input greater than 5.0 MMBtu/hr. Platform Heritage has a Central Process Heater rated at 27.200 MMBtu/hr. The NO<sub>x</sub> and CO emission standards of this rule are 30 ppmv and 400 ppmv (or 0.036 lb/MMBtu and 0.297 lb/MMBtu) respectively. Compliance is met by the use of low-NO<sub>x</sub> burners. Ongoing compliance is achieved through biennial source testing.

*Rule 343 - Petroleum Storage Tank Degassing:* This rule applies to the degassing of any above-ground tank, reservoir or other container of more than 40,000 gallons capacity containing any organic liquid with a vapor pressure greater than 2.6 psia or between 20,000 gallons and 40,000 gallons capacity containing any organic liquid with a vapor pressure greater than 3.9 psia. The only vessel to which this rule applies is the emulsion surge tank. Ongoing compliance with this rule will be achieved through the section F and G reporting and recordkeeping requirements of the rule.

*Rule 346 - Loading of Organic Liquid Cargo Vessels:* This rule applies to the transfer of organic liquids into an organic liquid cargo vessel. For this rule only, an organic liquid cargo vessel is defined as a truck, trailer or railroad car and, as such, this rule does not affect OCS sources.

*Rule 353 - Adhesives and Sealants:* This rule applies to the use of adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, or any other primers. Compliance shall be based on site inspections.

*Rule 359 - Flares and Thermal Oxidizers:* This rule applies to flares for both planned and unplanned flaring events. Compliance with this rule has been documented. A detailed review of compliance issues is as follows:

§ D.1 - Sulfur Content in Gaseous Fuels: Part (a) limits the total sulfur content of all planned flaring from South County flares to 15 gr/100 cubic feet (239 ppmv) calculated as H<sub>2</sub>S at standard conditions. A methyl diethanolamine sulfur treating unit which reduces the sulfur content of a portion of the platform produced gas will provide the flare with purge and pilot gas (445 scfh - planned flaring) that is within the limits of this rule (sulfur is limited to 30 ppmv by prior agreements). For all other planned emissions associated with platform flaring volumes, the permittee has obtained District approval to comply with the part (b) exemption of this rule that requires excess SO<sub>x</sub> emissions to be offset at a ratio of 1:1. Unplanned flaring is exempt from the sulfur standards of this rule.

§ D.2 - Technology Based Standard: Requires all flares to be smokeless and sets pilot flame requirements. The flare on Platform Heritage is in compliance with this section.

§ D.3 - Flare Minimization Plan: This section requires sources to implement flare minimization procedures so as to reduce SO<sub>x</sub> emissions. The Planned Flaring volume is 66 million standard cubic feet per month. The permittee has fully implemented their *Flare Minimization Plan*.

*Rule 360 - Boilers, Water Heaters, and Process Heaters (0.075 – 2 MMBtu/hr):* The permittee shall comply with the requirements of this rule whenever a new boiler, process heater or other external combustion device is added or an existing unit is replaced. An ATC/PTO permit shall be obtained prior to installation of any grouping of Rule 360 applicable boilers or hot water heaters whose combined system design heat input rating exceeds 2.000 MMBtu/hr. An ATC shall be obtained for any size boiler or water heater if the unit is not fired on natural gas or propane.

*Rule 361 - Boilers, Steam Generators, and Process Heaters (Between 2 – 5 MMBtu/hr):* The permittee shall comply with the requirements of this rule whenever a new boiler, process heater or other external combustion device is added or an existing unit is replaced. An ATC permit shall be obtained prior to installation, replacement, or modification of any existing Rule 361 applicable boiler or water heater rated over 2.000 MMBtu/hr. An ATC shall be obtained for any size boiler or water heater if the unit is not fired on natural gas or propane.

*Rule 505 - Breakdown Conditions:* This rule describes the procedures that the permittee must follow when a breakdown condition occurs to any emissions unit associated with Platform Heritage. A breakdown condition is defined as an unforeseeable failure or malfunction of (1) any air pollution control equipment or related operating equipment which causes a violation of an emission limitation or restriction prescribed in the District Rules and Regulations, or by State law, or (2) any in-stack continuous monitoring equipment, provided such failure or malfunction:

- a. Is not the result of neglect or disregard of any air pollution control law or rule or regulation;
- b. Is not the result of an intentional or negligent act or omission on the part of the owner or operator;
- c. Is not the result of improper maintenance;
- d. Does not constitute a nuisance as defined in Section 41700 of the Health and Safety Code;
- e. Is not a recurrent breakdown of the same equipment.

*Rule 603 - Emergency Episode Plans:* Section "A" of this rule requires the submittal of *Stationary Source Curtailment Plan* for all stationary sources that can be expected to emit more than 100 tons per year of hydrocarbons, nitrogen oxides, carbon monoxide or particulate matter. The permittee submitted such a plan on July 23, 1994. This Plan was updated on January 24, 1997.

*Rule 810 – Federal Prevention of Significant Deterioration (PSD):* This rule was adopted January 20, 2011 to incorporate the federal Prevention of Significant Deterioration rule requirements into the District’s rules and regulations. Future projects at the facility will be evaluated to determine whether they constitute a new major stationary source or a major modification.

**3.5. Compliance History**

This section contains a summary of the compliance history for this facility and was obtained from documentation contained in the District’s administrative files.

3.5.1 Variances: Since the last permit reevaluation the permittee has not received any new variances.

3.5.2 Violations: The following compliance actions have been documented since PTO/Part70 9102-R7 was issued on February 15, 2023.

VIOLATION TYPE	NUMBER	ISSUE DATE	DESCRIPTION OF VIOLATION
MIN	13438	06/21/2023	The violation documents a violation of District Rule 206. This violation resulted from failing to perform the source test of an equipment item on the scheduled test day.  District Rule 206 was violated for not adhering to condition 9.C.12 (d) of PT 70 PTO 09102-R7. Condition 9.C.12 (d) states, “Failing to perform the source test of an equipment item on the scheduled test day without a valid reason and without District’s authorization; shall constitute a violation of this permit.” The scheduled source test date was 02/21/2023 and the source test was completed on 04/02/2023 without notification or authorization from the District.

3.5.3 Significant Historical Hearing Board Actions/NOVs: There have been no significant *historical* Hearing Board actions since the initial Part 70 permit was issued.

**Table 3.1 Generic Federally Enforceable District Rules**

Generic Requirements	Affected Emission Units	Basis for Applicability	Adoption Date
<u>RULE 101:</u> Compliance by Existing Installations: Conflicts	All emission units	Emission of pollutants	June 1981
<u>RULE 102:</u> Definitions	All emission units	Emission of pollutants	August 25, 2016

<b>Generic Requirements</b>	<b>Affected Emission Units</b>	<b>Basis for Applicability</b>	<b>Adoption Date</b>
<u>RULE 103</u> : Severability	All emission units	Emission of pollutants	October 23, 1978
<u>RULE 201</u> : Permits Required	All emission units	Emission of pollutants	June 19, 2008
<u>RULE 202</u> : Exemptions to Rule 201	Applicable emission units, as listed in form 1302-H of the Part 70 application	Insignificant activities/emissions, per size/rating/function	August 25, 2016
<u>RULE 203</u> : Transfer	All emission units	Change of ownership	April 17, 1997
<u>RULE 204</u> : Applications	All emission units	Addition of new equipment of modification to existing equipment.	August 25, 2016
<u>RULE 205</u> : Standards for Granting Permits	All emission units	Emission of pollutants	April 17, 1997
<u>RULE 206</u> : Conditional Approval of Authority to Construct or Permit to Operate	All emission units	Applicability of relevant Rules	October 15, 1991
<u>RULE 207</u> : Denial of Applications	All emission units	Applicability of relevant Rules	October 23, 1978
<u>RULE 208</u> : Action on Applications – Time Limits	All emission units. Not applicable to Part 70 permit applications.	Addition of new equipment of modification to existing equipment.	April 17, 1997
<u>RULE 212</u> : Emission Statements	All emission units	Administrative	October 20, 1992
<u>RULE 301</u> : Circumvention	All emission units	Any pollutant emission	October 23, 1978
<u>RULE 302</u> : Visible Emissions	All emission units	Particulate matter emissions	June 1981
<u>RULE 305</u> : PM Concentration – South Zone	Each PM source	Emission of PM in effluent gas	October 23, 1978
<u>RULE 309</u> : Specific Contaminants	All emission units	Combustion contaminants	October 23, 1978
<u>RULE 310</u> : Odorous Organic Sulfides	All emission units	Emission of organic sulfides	October 23, 1978
<u>RULE 311</u> : Sulfur Content of Fuel	All combustion units	Use of fuel containing sulfur	October 23, 1978
<u>RULE 317</u> : Organic Solvents	Emission units using solvents	Solvent used in process operations.	October 23, 1978
<u>RULE 318</u> : Vacuum Producing Devices – Southern Zone	All systems working under vacuum	Operating pressure	October 23, 1978
<u>RULE 321</u> : Solvent Cleaning Operations	Cold solvent cleaning unit EQ No. 14-2	Solvent used in process operations.	June 21, 2012

<b>Generic Requirements</b>	<b>Affected Emission Units</b>	<b>Basis for Applicability</b>	<b>Adoption Date</b>
<u>RULE 322</u> : Metal Surface Coating Thinner and Reducer	Emission units using solvents	Solvent used in process operations.	October 23, 1978
<u>RULE 323.1</u> : Architectural Coatings	Paints used in maintenance and surface coating activities	Application of architectural coatings.	June 19, 2014
<u>RULE 324</u> : Disposal and Evaporation of Solvents	Emission units using solvents	Solvent used in process operations.	October 23, 1978
<u>RULE 353</u> : Adhesives and Sealants	Emission units using adhesives and sealants	Adhesives and sealants use.	June 21, 2012
<u>RULE 505.A, B1, D</u> : Breakdown Conditions	All emission units	Breakdowns where permit limits are exceeded or rule requirements are not complied with.	October 23, 1978
<u>RULE 603</u> : Emergency Episode Plans	Stationary sources with PTE greater than 100 tpy	Sable Offshore – SYU Project is a major source.	June 15, 1981
<u>REGULATION VIII</u> : New Source Review	All emission units	Addition of new equipment of modification to existing equipment. Applications to generate ERC Certificates.	August 25, 2016
<u>RULE 810</u> : Federal Prevention of Significant Deterioration	New or modified emission units	Major modifications	June 20, 2013
<u>RULE 901</u> : New Source Performance Standards (NSPS)	All emission units	Sable Offshore – SYU Project is a major source.	September 20, 2010
<u>RULE 1001</u> : National Emission Standards for Hazardous Air Pollutants (NESHAP)	All emission units	Sable Offshore – SYU Project is a major source.	October 26, 1993
<u>RULE 1301</u> : General Information	All emission units	Sable Offshore – SYU Project is a major source.	August 25, 2016
<u>RULE 1302</u> : Permit Application	All emission units	Sable Offshore – SYU Project is a major source.	November 9, 1993
<u>RULE 1303</u> : Permits	All emission units	Sable Offshore – SYU Project is a major source.	January 18, 2001
<u>RULE 1304</u> : Issuance, Renewal, Modification and Reopening	All emission units	Sable Offshore – SYU Project is a major source.	October 18, 2018
<u>RULE 1305</u> : Enforcement	All emission units	Sable Offshore – SYU Project is a major source.	November 9, 1993

**Table 3.2 Unit-Specific Federally Enforceable District Rules**

<b>Unit-Specific Requirements</b>	<b>Affected Emission Units (District Device No)</b>	<b>Basis for Applicability</b>	<b>Adoption Date</b>
<u>RULE 325</u> : Crude Oil Production and Separation	5363, 5364, 6366, 102539, 102540	All pre-custody production and processing emission units	July 19, 2001
<u>RULE 331</u> : Fugitive Emissions Inspection & Maintenance	102526 – 102536, and 102516 - 102525	Components emit fugitive hydrocarbons.	December 10, 1991
<u>RULE 333</u> : Control of Emissions from Reciprocating IC Engines	5350, 5370, 5371, 5372, 7143	IC engines exceeding 50 bhp rating.	June 19, 2008
<u>RULE 359</u> : Flares and Thermal Oxidizers	102383 - 102385	Flaring	June 28, 1994
<u>RULE 360</u> : Boilers, Water Heaters, and Process Heaters (0.075 – 2 MMBtu/hr)	No units are currently subject to this rule.	Rated between 75,000 and 2,000,000 Btu/hr	March 15, 2018
<u>RULE 361</u> : Boilers, Steam Generators, and Process Heaters (Between 2 – 5 MMBtu/hr)	No units are currently subject to this rule.	Rated between 2.000 and 5.000 MMBtu/hr	June 20, 2019

**Table 3.3 Non-Federally-Enforceable District Rules**

<b>Requirement</b>	<b>Affected Emission Units</b>	<b>Basis for Applicability</b>	<b>Adoption Date</b>
<u>RULE 210</u> : Fees	All emission units	Administrative	March 17, 2005
<u>RULE 310</u> : Odorous Organic Sulfides	All emission units	Odorous sulfide emissions	October 23, 1978
<u>RULE 352</u> : Natural Gas-Fired Fan-Type Central Furnaces and Small Water Heaters	New water heaters and furnaces	Upon installation	October 20, 2011
<u>RULES 501-504</u> : Variance Rules	All emission units	Administrative	October 23, 1978
<u>RULE 505.B2, B3, C, E, F, G</u> : Breakdown Conditions	All emission units	Breakdowns where permit limits are exceeded or rule requirements are not complied with.	October 23, 1978
<u>RULES 506-519</u> : Variance Rules	All emission units	Administrative	October 23, 1978

## 4.0 Engineering Analysis

### 4.1. General

The engineering analyses performed for this permit were limited to the review of:

- Emission factors and calculation methods for each emissions unit
- Emission control equipment (including RACT, BACT, NSPS, NESHAP, MACT)
- Emission source testing, sampling, CEMS, CAM
- Process monitors needed to ensure compliance

Unless noted otherwise, default ROC/THC reactivity profiles from the District's document titled "VOC/ROC Emission Factors and Reactivities for Common Source Types" dated 7/13/98 (ver 1.1) was used to determine non-methane, non-ethane fraction of THC.

### 4.2. Stationary Combustion Sources

The stationary combustion sources associated with Platform Heritage consist of diesel-fired piston internal combustion engines, the flare relief system and the Central Process Heater. Primary power on the platform is supplied by an onshore cogeneration plant via a subsea power cable to the platform.

- 4.2.1 Piston Internal Combustion Engines: All platform internal combustion engines are diesel-fuel fired. The largest source of IC engine emissions is the pedestal crane. Other stationary IC engines on the platform rated over 50-bhp include two cement pump engines, one cuttings reinjection pump engine, one drilling rig emergency electrical generator, one production emergency generator, two emergency firewater pumps, and two escape capsules. Platform Heritage has one escape capsule which is rated at less than 50 bhp. The following calculation methodology is similar for all stationary IC engines:

$$ER = \left( \frac{EF * BHP * BSFC * LCF * HPP}{10^6} \right)$$

where: ER = emission rate (lb/period)  
EF = pollutant specific emission factor (lb/MMBtu)  
BHP = engine rated max brake-horsepower (bhp)  
BSFC = engine brake specific fuel consumption (Btu/bhp-hr)  
LCF = liquid fuel correction factor, LHV to HHV  
HPP = operating hours per time period (hrs/period)

The emission factor is an energy based value using the higher heating value (HHV) of the fuel. As such, an energy based BSFC value must also be based on the HHV. Manufacturer BSFC data are typically based on lower heating value (LHV) data and thus require a conversion (LCF) to the HHV basis. For diesel fuel oil, the HHV values are typically 6 percent greater than the corresponding LHV data. Volume or mass based BSFC data do not require conversion.

- 4.2.2 Crane Engine: The East Pedestal Crane is driven by a Detroit Diesel Model 8V-92TA engine rated at 450 bhp. RICE NESHAP regulations (40 CFR 63 Subpart ZZZZ) requires the control of carbon monoxide emissions from diesel crane engines. Table 2d (§63.6603) of the subpart specifies that engines greater than or equal to 300 bhp and less than 500 bhp must either limit the

concentration of carbon monoxide in the exhaust to 49 ppmvd at 15 percent oxygen or reduce carbon monoxide emissions by 70 percent. The crane engine on Platform Heritage is subject to this regulation. The permittee installed oxidation catalysts under Authority to Construct Nos. 14010-01, 14010-02 and 14010-03 to comply with the 49 ppmvd at 15 percent oxygen limit. A closed crankcase ventilation system was also installed to further control engine emissions. This permit allows for the operation of the catalysts and the crankcase ventilation system. The emission factors for PM<sub>10</sub> and ROC are based on USEPA AP-42, Table 3.3-1 (10/96) and the SO<sub>x</sub> emission factor is based on mass balance. The NO<sub>x</sub> emission factor is based on Rule 333 limits. Per AP-42, PM<sub>10</sub> and PM<sub>2.5</sub> are assumed to equal PM. The engine complies with the Rule 333 NO<sub>x</sub> limit of 700 ppmv at 15 percent oxygen.

Drilling Support Engines: The cuttings reinjection pump is driven by a Tier 3, 450 bhp, turbocharged, Detroit Diesel model 6063HV36 diesel fired engine manufactured in 2012. This same engine serves drilling activities on all three Sable Platforms. Emission factors for the engine are documented in Attachment 10.1. The NO<sub>x</sub>, ROC, CO, PM, PM<sub>10</sub> and PM<sub>2.5</sub> emissions factors have been determined by multiplying Tier III emission factors by 1.25. Tier standards are based on weighted averages across a range of operating conditions. Therefore, the default emission factors are not always representative of the engine's worst case operating scenario. These new emission factors are called the not-to-exceed (NTE) factors (see 40 CFR 60 Subpart III §60.4212.b). The SO<sub>x</sub> emission factor is based on a mass balance calculation.

The two cement pumps are each driven by a Tier 3 Cummins model QSM11-C diesel-fired engine rated at 500 bhp. These two engines are model year 2006. Tier 3 emission factors were used in the emission calculations for these engines. The engines comply with the Rule 333 NO<sub>x</sub> limit of 700 ppmv at 15 % O<sub>2</sub> and ROC limit of 750 ppmv at 15% O<sub>2</sub>, as well as the Tier 1 requirements of NSPS III.

The IC engines on the platform are not equipped with diesel fuel flow metering devices. All IC engines are equipped with non-resettable hour meters. The actual engine usage is logged during each time the engine is fired. Emissions are calculated using total elapsed run time, the maximum rated engine bhp rating and BSFC data (from Table 5.1) to determine the number of gallons consumed per unit time.

- 4.2.2 External Combustion Equipment: The only external combustion equipment on Platform Heritage is the Central Process Heater. The ROC and PM emission factors are based on USEPA, AP-42 Table 1.4-2 (3/98). Per AP-42, PM<sub>10</sub> and PM<sub>2.5</sub> is assumed to equal PM. The SO<sub>x</sub> emission factor is based on mass balance. The NO<sub>x</sub> and CO emission factor is based on the Rule 342 limits of 30 ppmv and 400 ppmv at 3 percent oxygen (0.036 lb/MMBtu and 0.297 lb/MMBtu). This unit is equipped with an orifice meter connected to the Distributed Control System for fuel monitoring purposes. The pollutant emission rates for this equipment will be determined by the permitted emission factors (lb/MMBtu) and fuel usage rates. Periodic analysis of the fuel gas will be conducted to determine the HHV and sulfur content of the fuel gas.

The sweet gas produced from the sandstone formation may also be used as fuel gas to the Central Process Heater. The produced gas is ~30 ppmv H<sub>2</sub>S, meeting the sulfur content requirement of District Rule 311.

Propane (HD-5 specification) fuel may also be fired as a backup fuel when the natural gas supply has been interrupted. The NO<sub>x</sub> and CO emission factors are based on Rule 342 limits. ROC and PM emission factors are based on USEPA, AP-42 Table 1.4-1 (3/98) – the emission factor basis



is the same as natural gas on a heat input basis. Per AP-42, PM<sub>10</sub> and PM<sub>2.5</sub> is assumed to equal PM. The SO<sub>x</sub> emission factor is based on mass balance using the Gas Processors Association standard for HD-5 (123 ppmw).

4.2.3 Flare Relief System: The flare relief system consists of a header that connects to various PSVs on production and test vessels, compressors, glycol system and pigging vessels. The flare is a Kaldair model EAL-602 with a design heat release of 3820 MMBtu/hr.

Planned and unplanned flaring events occur on the platform. Planned events include purge and pilot requirements. NO<sub>x</sub>, CO and ROC emission factors are based on USEPA AP-42, Section 13.5 (9/91). SO<sub>x</sub> emissions are based on mass balance calculations. The PM emission factor is based on District Flare Study – Phase I Report (7/91). The PM<sub>10</sub>/PM and PM<sub>2.5</sub>/PM ratios are assumed to equal 1.0. The ROC/TOC ratio is assumed to equal 0.86.

- *Purge and Pilot* - The H<sub>2</sub>S concentration of the purge and pilot gas is continuously monitored by a Houston Atlas H<sub>2</sub>S detector located on the amine sweetening unit.
- *Planned – Continuous* - The flare header is equipped with a Fluid Components LT81A Gas Mass Flow Meter that is capable of detecting a minimum flow rate of 1,503 scfh. As such, there is no practical method for assessing flow rates below 1,503 scfh. Based on EPA and CARB's data reporting guidelines, a value of half the minimum detection limit is assumed to be "continuous" planned flaring. The H<sub>2</sub>S concentration of the "continuous" planned flare gas is assumed to be 20,000 ppmv which corresponds to the anticipated average H<sub>2</sub>S concentration of the platform produced gas.
- *Planned and Unplanned Other* - Other planned flaring sulfur levels will be determined by gas detector tubes (or equivalent District-approved method). Unplanned flaring is exempt from the sulfur standards of Rule 359.

The emissions for both planned and unplanned flaring events are calculated. The SO<sub>x</sub> emission factor is determined using the equation: (0.169)(ppmv S)/(HHV). The calculation methodology for the flare emissions is:

$$ER = \frac{EF * SCFPP * HHV}{10^6}$$

where: ER = emission rate (lb/period)  
 EF = pollutant specific emission factor (lb/MMBtu)  
 SCFPP = gas flow rate per operating period (scf/period)  
 HHV = gas higher heating value (Btu/scf)

To meet the requirements of Rule 359, the permittee uses purge and pilot gas that complies with the rule limit of 239 ppmv and has obtained exemption approval to exceed the sulfur limits for all other planned flaring activities. The sweet gas produced from the sandstone formation may also be used as fuel gas to the flare relief system. The produced gas is ~30 ppmv H<sub>2</sub>S, meeting the sulfur content requirement of District Rule 311.

### 4.3. Fugitive Hydrocarbon Sources

4.3.1 General: Fugitive hydrocarbon emissions occur from leaks in process components such as valves, connections, pumps, compressors and pressure relief devices. Each of these component types may be comprised of several potential "leak paths" at the facility. For example, leak paths associated with a valve include the valve stem, bonnet and the upstream and downstream flanges. The total number of leak paths at the facility must be determined to perform fugitive emission calculations.

4.3.2 Emission Factors: Emissions of reactive organic compounds from piping components such as valves, flanges and connections have been quantified using empirical models (Tecolote Report, 1986). The equation from Model B is utilized. The uncontrolled emission factors are taken from District Policy & Procedure 6100.061 (9/25/98). The number of emission leak-paths (including pump and compressor seals and excluding all exempt components) were determined by the operator and verified by District staff by a site check of a representative number of P&IDs. Emissions are based on a total of 16,939 gas/condensate component-leakpaths and 10,052 oil/emulsion component-leakpaths. The calculation methodology for the fugitive emissions is:

$$ER = \left( \frac{EF * CLP}{24} \right) * (1 - CE) * HPP$$

where: ER = emission rate (lb/period)  
EF = ROC emission factor (lb/clp-day)  
CLP = component leak-path (clp)  
CE = control efficiency  
HPP = operating hours per time period (hrs/period)

4.3.3 Emission Controls: Differing emission control efficiencies are credited to all components that are safe to monitor (as defined per Rule 331) due to the implementation of a District-approved Inspection and Maintenance program for leak detection and repair consistent with Rule 331 requirements. The control efficiencies vary based on component design, monitoring frequency, and leak detection threshold. This facility operates Category B valves and flanges/connections (85% control), Category F valves and flanges/connections (90% control) which are subject to BACT, and 80% for the remainder of the safe-to-monitor components. Unsafe to monitor components are not eligible for I&M control credit. (See Permit Guideline Document 15 – *Fugitive Emissions from Valves, Fittings, Flanges, Pressure Relief Devices, Seals, and Other Components – Component-Leakpath Method* for a detailed discussion of the various categories defined for valves and flanges/connections).

The permittee has classified a large number of components as “emitters less than 500 ppmv” (Category B) and “emitters less than 100 ppmv” (Category F). Category B component-leakpaths are maintained at or below 500 ppmv as methane, monitored quarterly per EPA Reference Method 21. For such Category B component-leakpaths, screening values above 500 ppmv trigger the Rule 331 repair process per the minor leak schedule. Category C component-leakpaths are maintained at or below 100 ppmv as methane, monitored quarterly per EPA Reference Method 21. Category F component-leakpaths are subject to NSR BACT provisions of Rule 331. Category F components are maintained at or below 100 ppmv as methane, monitored quarterly per EPA Reference Method 21. Screening values above 100 ppmv trigger the Rule 331 repair process per the minor leak schedule for Category C and F component-leakpaths. Table 4.2 (*Rule 331 BACT Requirements*) lists the specific BACT requirements for these components.

Ongoing compliance is determined in the field by inspection with a Method 21 compliance monitoring device and verification of operator records.

#### 4.4. **Crew and Supply Boats**

The permittee uses crew and supply boats in support of Platform Heritage. For these boats, two categories of boats may be used. One type is for dedicated project usage (DPV) that is controlled for NO<sub>x</sub> and the other is used as a spot-charter and may be uncontrolled for NO<sub>x</sub>. The spot-charter usage is limited to 10 percent of actual (DPV) boat usage

##### 4.4.1 Supply Boat: The supply boat now used to establish the potential to emit is the *M/V Santa Cruz*.

- *Main Engines* - This boat is equipped with two main propulsion diesel-fired IC engines (CAT 3516B). These engines are rated at 2,000 bhp at 1600 rpm for continuous duty (“A” rating). These engines are optimized for low emissions (NO<sub>x</sub>) through use of Dual Advanced Diesel Engine Management (ADEMII) modules with electronically controlled unit injectors, as well as dual turbochargers and a separate circuit aftercooler core. The NO<sub>x</sub> emission factor is based on the existing operating permit limit of 8.4 g/bhp-hr (337 lb/1000 gallons). ROC and CO emission factors have been updated to reflect the larger size of these engines and are taken from Table II-3.3 of USEPA, AP-42 (Volume II). Sulfur oxide emissions are based on mass balance calculations assuming 0.0015 weight percent sulfur diesel fuel (CARB diesel).
- *Auxiliary Engines* - Auxiliary diesel-fired engines on this vessel include two-170 kW CAT 3306B DIT generator sets each powered by identical 245 bhp engines and one bow thruster powered by a CAT 3408C DITA 500 bhp engine. These auxiliary engines are not controlled. The same USEPA AP-42 emissions factors used in the original operating permit are still applicable. Sulfur oxide emissions are based on mass balance calculations assuming 0.0015 weight percent sulfur diesel fuel (CARB diesel).

##### 4.4.2 Crew Boat: The crew boat now used to establish the potential to emit is the *M/V Callie Jean*.

- *Main Engines* - This boat is equipped with four main propulsion diesel-fired IC engines (DDC/MTU 12V-2000). These engines are rated at 965 bhp each for continuous duty for a total of 3,860 bhp. These engines are optimized for low emissions (NO<sub>x</sub>) through use of DDEC electronic control systems, as well as dual turbochargers and intercooling. The NO<sub>x</sub> emission factor is based on the existing OCS operating permit limit of 8.4 g/bhp-hr (337 lb/1000 gallons). ROC and CO emission factors have been updated to reflect the larger size of these engines and are taken from Table II-3.3 of USEPA, AP-42 (Volume II). Sulfur oxide emissions are based on mass balance calculations assuming 0.0015 weight percent sulfur diesel fuel (CARB diesel).
- *Auxiliary Engines* - Auxiliary diesel-fired engines on this boat include two 131 bhp diesel-driven generators (Detroit Diesel 3-71). These auxiliary engines are not controlled for NO<sub>x</sub>.

The permit is assessing emission liability based on a single emission factor (the cruise mode). For engines with the controls listed above, a full load NO<sub>x</sub> emission factor of 8.4 g/bhp-hr (337 lb/1000 gallons) is used. Sulfur oxide emissions are based on mass balance calculations assuming 0.0015 weight percent sulfur diesel fuel. Other main engine vessel emission factors are taken from USEPA, AP-42 (Volume II). For the auxiliary and bow thruster engines, emission factors are taken from USEPA, AP-42 (Volume I). Uncontrolled NO<sub>x</sub> main engine emission factors for spot-charter supply boat usage are assumed to be 14 g/bhp-hr (561 lb/1000 gallons).

Per DOI No. 0042 Mod - 01, the permittee installed new Tier II engines on the *M/V Broadbill*. The four main propulsion engines are Tier II Detroit Diesel Series 60 engines (each rated at 600 bhp). The two auxiliary engines are Tier II Northern Lights Model M40C2 engines (each rated at 62 bhp). The main propulsion engines are optimized for low emissions (NO<sub>x</sub>) through use of DDEC electronic control systems, as well as turbochargers.

On October 2, 2020, the District received an application for DOI No. 0042 Mod - 02, to replace the *M/V Broadbill* with the *M/V Ryan T*. The *M/V Ryan T* has four (4) Tier III main propulsion engines and two (2) Tier III auxiliary engines. The four (4) main propulsion engines are Tier III John Deere PowerTech 6135AFM85 engines (each rated at 575 bhp). The two (2) auxiliary engines are Tier III Northern Light M30CW3.2 engines (each rated at 40.2 bhp). The main propulsion engines are equipped with turbochargers and are air-to-coolant aftercooled. The District determined that the use of the *M/V Ryan T* instead of the *M/V Broadbill* maintained the validity of the Emission Reduction Credits associated with DOI 0042-01. The *M/V Broadbill* remains as the emissions basis for the DOI as listed in Table 5.1 – 5.4.

On August 16, 2021 the District received an application for DOI No. 0042 Mod - 03, to replace the *M/V Broadbill* with the *M/V Capt T Le* in addition to the *M/V Ryan T*. The *M/V Capt T Le* has three (3) Tier III main propulsion engines and two (2) Tier III auxiliary engines. The three (3) main propulsion engines are Tier III John Deere PowerTech 6135SFM85 engines (each rated at 575 bhp). The two (2) auxiliary engines are Tier III Kohler 32EOZD engines (each rated at 42.9 bhp). The main propulsion engines are equipped with turbochargers and are air-to-coolant aftercooled. The District determined that the use of the *M/V Ryan T* and the *M/V Capt T Le* alternative crew boats for the *M/V Broadbill* ensures validity of the validity of the Emission Reduction Credits associated with DOI 0042-01. There is no change to the amount of emission reduction credits that may be created by this DOI and the *M/V Broadbill* remains as the emissions basis for the DOI as listed in Table 5.1 – 5.4.

4.4.3 Calculation Methods: The permit assesses emission liability based solely on a single emission factor (the cruise mode). The calculation methodology for the crew and supply boat main engine emissions is:

$$ER = \left( \frac{EF * EHP * BSFC * EL * TM}{10^3} \right)$$

where:

- ER = emission rate (lbs per period)
- EF = full load pollutant specific emission factor (lb/1000 gallons)
- EHP = engine max rated horsepower (bhp)
- BSFC = engine brake specific fuel consumption (gal/bhp-hr)
- EL = engine load factors (percent of max fuel consumption)
- TM = time in mode (hours/period)

The calculations for the auxiliary engines are similar, except that a 50 percent engine load factor for the generators is utilized. Compliance with the main engine controlled emission rates are assessed through emission source testing). Ongoing compliance will be assessed through implementation of the District-approved *Boat Monitoring and Reporting Plan*.

In addition, there is a permanently assigned emergency response vessel, which is one of four emergency vessels operated by Clean Seas LLC. These boats are the *Ocean Guardian*, *Ocean*

*Scout, Ocean Sentinel, and Ocean Defender.* During normal operations, only one boat is operated at a time at this stationary source. Each boat is equipped with identical low-emission engines: two CAT C32 1,450 bhp main engines and two CAT 2.2 44.5 bhp auxiliary engines. The main engines are EPA certified Marine Tier 2 engines and the auxiliary engines are EPA certified non-road interim Tier 4 engines. The total engine horsepower for each boat, including auxiliary engines, is 2,989 bhp. Emissions liability is assigned in a prorated fashion among the eleven OCS platforms that utilize the vessels off the Santa Barbara coast. If used, other emergency response boat fuel usage (and resulting emissions) shall be assessed against this emissions category.

Emission Factors: For the main engines, the engine manufacturer Not-to-Exceed (NTE) emission factors were compared with Tier 2 emission factors (*Table 2: U.S. EPA Marine Engine Emission Standards*) to determine which would result in the worst case emissions rate. The greater of the emission factors was used in the emissions calculations. NTE emission factors were provided by the engine manufacturer. NO<sub>x</sub> was the only NTE emission factor that exceeded the table emission factors and therefore was the only NTE factor used in the calculations. Tier 2 emission factors were used for the remaining pollutants. A five percent factor was applied to the NO<sub>x</sub>+HC Tier 2 emission standard to obtain the ROC emission factor.

The auxiliary engines are interim Tier 4 engines, however, Tier 2 non-road compression-ignition engine emission factors were used to establish the PTE of the auxiliary engines to provide flexibility for circumstances which may require use of a different boat in the future. The applicable NO<sub>x</sub>+HC emission factor is 5.6 g/hp-hr for the auxiliary engine (0.55 li/cyc). A five percent factor for the HC component was applied to obtain the NO<sub>x</sub> and ROC emission factors. All emission factors (g/bhp-hr) for the main and auxiliary engines were converted to lb/1,000 gal and are provided in Table 5.1-2.

Reasonable Worst Case Emission Scenario: Engine data in Table 5.1 define the operational characteristics that comprise the reasonable worst case-operating scenario for this permit. Use of the NTE and Tier 2 emission factors listed in Table 5.2, as described above, were applied in conjunction with the operational data to establish the worst case emissions scenario.

#### **4.5. Sulfur Treating/Gas Sweetening Unit**

Platform Heritage is equipped with a methyl diethanolamine gas sweetening unit. The purpose of this unit is to remove hydrogen sulfide from the produced gas for use in the Central Process Heater and the flare purge and pilot. The maximum treating capacity of this unit is 1.5 MMscfd at 1.5 percent H<sub>2</sub>S (or 0.75 MMscfd at 3.0 percent H<sub>2</sub>S). This is adequate to supply the flare purge and pilot (445 scfh) and the Central Process Heater maximum fuel requirement (650,000 scfh). The acid gas from this system is recycled to the STV compressors. This system is equipped with a Houston Atlas H<sub>2</sub>S analyzer and process controls to ensure that compliance with Rules 311 and 359 is achieved, as well as the permit limit of 30 ppmv H<sub>2</sub>S.

#### **4.6. Tanks/Vessels/Sumps/Separators**

- 4.6.1 Tanks: Platform Heritage has one diesel fuel storage tank, a drilling deck drains settling tank and several chemical storage tote tanks (e.g., corrosion inhibitor storage tank, methanol storage tank, etc.) of various sizes (250-1500 gallons each). The portable tote tanks are used in lieu of 55-gallon drums to deliver various chemicals to the platform including xylene, de-emulsifiers, corrosion inhibitors, and anti-foam. The diesel storage tank services the various IC engines on the platform and is not controlled. All these tank emissions are very small and are assumed to be

less than 0.10 tpy (200 lb/yr). The detailed tank calculations for compliance will be performed using the methods presented in USEPA AP-42, Chapter 7.

The drill deck drains settling tank collect liquids from the drill deck and the wellbay sump and separates the solids from liquids and oil from water. The oil is routed to the open drain sump and the water to the skim pile. The skim pile vessel is covered but not connected to the vapor gathering system.

- 4.6.2 **Vessels:** Platform Heritage has many pressure vessels (e.g., production separators, a test separator, clean-up separator, test treater, emulsion surge tank, vent scrubber, and suction scrubbers). All pressure vessels are connected to the platform's gas gathering system. All PSVs are connected to the flare relief system header. Emissions from pressure vessels are a result of fugitive hydrocarbon leaks from valves and connections.
- 4.6.3 **Sumps:** There is an open and closed drain sump, a skim pile, amine sump and a wellbay drain sump on the platform. The closed drain sump and the amine sump are connected to the vapor recovery system. The remaining tanks are covered.

The tank and sump tank emissions are based on the CARB/KVB Report (*Emissions Characteristics of Crude Oil Production in California*, January 1983). The calculation is:

$$ER = \left[ \left( \frac{EF * SAREA}{24} \right) * CE * HPP \right]$$

where: ER = emission rate (lb/period)  
 EF = ROC emission factor (lb/ft<sup>2</sup>-day)  
 SAREA = unit surface area (ft<sup>2</sup>)  
 CE = control efficiency  
 HPP = operating hours per time period (hrs/period)

The emission factors are documented in the District's P&P 6100.060. For open top tanks, no control efficiency is assigned. A leak free cover with PVRVs is approximately 85 percent efficient and hookup to vapor recovery is assigned a 95 percent control efficiency.

#### 4.7. **Vapor Recovery Systems**

The platform vapor recovery system is equipped with one electrically driven 50 bhp A-C Compressor Corp. compressor (Model 10GB) with a design capacity of 0.5 MMscfd. The compressed vapors are routed to the STV compressor for sales, injection or gas lift. The following equipment is connected to the vapor recovery system: glycol still, amine sump, glycol sump, closed drain, compressor distance pieces, and STV compressor discharge. All remaining major vessels are vented to the flare header.

#### 4.8. **Helicopters**

Helicopters are primarily used for personnel transportation and emergencies. Each round trip usually originates and terminates at the Santa Barbara Airport and averages approximately forty-five minutes. Emission factors in units of "lb/hr" for different types of helicopters have been established for each operating mode based on the particular turbine engine used. These modes (idle, climb, cruise, and descent) make up the total cycle time for each trip segment. For Platform Heritage, there are two identical trip segments (Santa Barbara Airport to Platform Heritage and

Platform Heritage to the Santa Barbara Airport). The emission rate per trip segment is calculated as:

$$ER = \sum_{\text{mode}} (EF_{\text{mode}} * TIM)$$

where:

ER = Emission rate per trip segment (lb/segment)  
 EF = pollutant specific emission factor per mode (lb/engine-hr)  
 TIM = Time in Mode (hr)

From this data, a platform specific emission rate per trip segment is calculated. For platform Heritage, the one trip segment is simply doubled to obtain an emission rate per trip. Emission tracking will be accomplished by reporting the number of trips per helicopter.

#### 4.9. Other Emission Sources

The following is a brief discussion of other emission sources on Platform Heritage:

- 4.9.1 Pigging: Pipeline pigging operations occur on the platform. These consist of an emulsion pipeline pig launcher to Platform Harmony and a produced gas pipeline pig launcher to Platform Harmony. The pig launchers are connected to either the VRS or the flare header and are depressurized to this system after each use. The small amount of emissions which remain are vented to the atmosphere. The permittee has committed to maintain the remaining pressure at levels no greater than 1 psig. The calculation per time period is:

$$ER = V_1 * \rho * wt\% * EPP$$

where:

ER = emission rate (lb/period)  
 V<sub>1</sub> = volume of vessel (ft<sup>3</sup>)  
 ρ = density of vapor at actual conditions (lb/ft<sup>3</sup>)  
 wt % = weight percent ROC-TOC  
 EPP = pigging events per time period (events/period)

- 4.9.2 General Solvent Cleaning/Degreasing: Solvent usage (not used as thinners for surface coating) occurs on Platform Heritage as part of normal daily operations and includes small cold solvent degreasing and wipe cleaning. Mass balance emission calculations are used assuming all the solvent used evaporates to the atmosphere. Additionally, there is one cold solvent degreasing unit located on Platform Heritage.
- 4.9.3 Surface Coating: Surface coating operations typically include normal touch up activities. Entire platform painting programs are performed once every few years. Emissions are determined based on mass balance calculations assuming all solvents evaporate into the atmosphere. Emission of PM/PM<sub>10</sub>/PM<sub>2.5</sub> from paint overspray are not calculated due to the lack of established calculation techniques.
- 4.9.4 Abrasive Blasting: Abrasive blasting with CARB certified sands may be performed as a preparation step prior to surface coating. The engines used to power the two compressors are diesel driven. Particulate matter is emitted during this process. A general emission factor of 0.01 pound PM per pound of abrasive is used (SCAQMD - Permit Processing Manual, 1989) to estimate emissions of PM and PM<sub>10</sub>. PM<sub>10</sub>/PM and PM<sub>2.5</sub>/PM ratios of 1.0 is assumed.

#### **4.10. BACT/NSPS/NESHAP/MACT**

Except as described below, none of the emission units at Platform Heritage are subject to best available control technology (BACT), NSPS or NESHAP provisions.

BACT has been triggered pursuant to modifications authorized under ATC 9634 for the installation of a skid-mounted natural gas compressor unit and ATC 9099 for the Amine Fuel Gas System. As part of ATC 9828, the permittee voluntarily implemented BACT controls on the Heritage/Harmony gas pipeline topsides project in order minimize their offset liability. BACT for NO<sub>x</sub> and CO has been triggered for the Cuttings Reinjection Pump engine per ATC 14145. Table 4.1 detail the BACT requirements for Platform Heritage.

Pursuant to Rule 331.E.1.b, all leaks from critical components are required to be replaced with BACT in accordance with the District's NSR rule. Table 4.2 details the Rule 331 BACT requirements for Platform Heritage.

Existing engines on the platform are subject to NESHAP ZZZZ. New engines on the platform are subject to NSPS IIII.

#### **4.11. CEMS/Process Monitoring/CAM**

4.11.1 CEMS: There are no in-stack continuous emission monitoring systems used on Platform Heritage to measure criteria pollutant emissions. However, a hydrogen sulfide analyzer is required to assess compliance with the fuel gas sulfur limits. This analyzer is classified as a CEM by the District and is subject to the Districts' CEM Protocol document (dated October 22, 1992 and any subsequent updates). This data does not have to be telemetered to the District. For most platform operations, process monitors (e.g., fuel meters) provide adequate data to assess compliance.

4.11.2 Process Monitoring: In many instances, ongoing compliance beyond a single (snap shot) source test is assessed by the use of process monitoring systems. Examples of these monitors include: engine hour meters, fuel usage meters, water injection mass flow meters, flare gas flow meters and hydrogen sulfide analyzers. Once these process monitors are in place, it is important that they be well maintained and calibrated to ensure that the required accuracy and precision of the devices are within specifications. At a minimum, the following process monitors will be required to be operated, calibrated and maintained in good working order:

- Crane Engine Diesel Fuel Meter (if applicable)
- Supply Vessel Diesel Fuel Meters (main and auxiliary/bow thruster engines)
- Crew Vessel Diesel Fuel Meters (main and auxiliary engines)
- Flare Header Flow Meters
- Hour Meters (crane engine, emergency generator engines, firewater pump engines, compressor engines, and the cuttings reinjection pump engine)
- Hydrogen Sulfide Analyzer
- Central Process Heater Fuel Meter

To implement the above calibration and maintenance requirements, a *Process Monitor Calibration and Maintenance Plan* was required of the permittee. This Plan takes into consideration manufacturer recommended maintenance and calibration schedules. Where



manufacturer guidance is not available, the recommendations of comparable equipment manufacturers and good engineering judgement are utilized.

- 4.11.3 CAM: *Sable Offshore – SYU Project* is a major source that is subject to the USEPA’s Compliance Assurance Monitoring (CAM) rule (40 CFR 64). Any emissions unit at the facility with uncontrolled emissions potential exceeding major source emission thresholds for any pollutant is subject to CAM provisions. Currently no units at Platform Heritage are subject to a CAM Plan. The platform does not have any equipment, which uncontrolled would exceed 100 TPY of any criteria pollutant.

#### **4.12. Source Testing/Sampling**

Source testing and sampling are required in order to ensure compliance with permitted emission limits, prohibitory rules, control measures and the assumptions that form the basis of this operating permit. Table 4.3 details the pollutants, test methods and frequency of required testing. The permittee is required to follow the District *Source Test Procedures Manual* (May 24, 1990 and all updates). The following emission units are required to be source tested.

- Crane Engine
- Supply Boat Main Engines
- Crew Boat Main Engines
- Central Process Heater
- Cement Pump and Cuttings Reinjection Pump Engines (if triggered by Rule 333. I.8)

At a minimum, the process streams below are required to be sampled and analyzed on an annual basis. Duplicate samples are required:

- Produced Gas: Sample taken at production separator outlet. Analysis for: HHV, total sulfur, hydrogen sulfide, and composition.
- Fuel Gas: Sample taken at fuel gas header. Analysis for: HHV, total sulfur, hydrogen sulfide, and composition.
- Produced Oil: Sample taken at outlet from the production separator. Analysis for: API gravity; true vapor pressure (per Rule 325 methods).

All sampling and analyses are required to be performed according to District approved procedures and methodologies. Typically, the appropriate ASTM methods are acceptable. It is important that all sampling and analysis be traceable by chain of custody procedures. The permittee’s source test plan shall include the specific sampling and analytical methods required to obtain the process stream data above.

**Table 4.1 BACT Requirements for Specific Systems**

<b>Equipment/Component Type</b>	<b>Technology</b>	<b>Performance Standard</b>	<b>System Subject to Emission Control Requirements</b>
<i>Cuttings Reinjection Pump Engine</i>	EPA Tier III certified engine	3.50 g/bhp-hr or 260 ppmv NO <sub>x</sub> @ 15% O <sub>2</sub> 3.25 g/bhp-hr or 396 ppmv CO @ 15% O <sub>2</sub>	ATC 14147
<i>Valves</i>	Low Emission Design Valves (e.g., bellows seal valves, valves with graphite or Teflon packing, machined stems or “stem finish”, injectable valve stem packing with Teflon or graphite rings).	100 ppm as methane above ambient, monitored per EPA Reference Method 21.	*Gas Compressor Skid Unit No. CZZ-306 *ATC 9828 Topsides Installation
	NSPS KKK standards apply	1000 ppm as methane above ambient, monitored per EPA Reference Method 21.	*Amine Fuel Gas Treating System
<i>Connectors (Flanges/Connections)</i>	Flanges: graphitic gaskets rated at 150% of actual process pressure and process temperature; Non-flange connections: none specified.	100 ppm as methane above ambient, monitored per EPA Reference Method 21.	*Gas Compressor Skid Unit No. CZZ-306 *ATC 9828 Topsides Installation
	NSPS KKK standards apply	1000 ppm as methane above ambient, monitored per EPA Reference Method 21.	*Amine Fuel Gas Treating System
<i>Compressor Seals</i>	Each compressor cylinder is equipped with two sealed compartment distance pieces which surround the reciprocating compressor cylinder’s power-shaft. The inner distance piece is purged with blanket gas and connected to vapor recovery; the outer distance piece is connected to the flare, with no supplemental blanket gas purge. The outer distance piece has an atmospheric seal system surrounding the reciprocating power-shaft.	100 ppm as methane above ambient, monitored per EPA Reference Method 21, if possible to monitor.	Gas Compressor Skid Unit No. CZZ-306
	NSPS KKK standards apply	1000 ppm as methane above ambient, monitored per EPA Reference Method 21.	*Amine Fuel Gas Treating System
<i>Relief Valves</i>	Routed to vapor recovery or flare.	Vapor recovery or flare/thermal oxidation system to have a capture/destruction efficiency of ≥ 98% by weight.	Gas Compressor Skid Unit No. CZZ-306
	NSPS KKK standards apply	500 ppm as methane above ambient, monitored per EPA Reference Method 21.	*Amine Fuel Gas Treating System

Component Type	Technology	Performance Standard	System Subject to Emission Control Requirements
<i>Repairs Timelines</i>	Repairs to any BACT valve, flange/connection or compressor seal (if monitoring possible) showing between 100 ppm and 10,000 ppm above ambient to be made on the schedule detailed in Rule 331 for minor leaks. Repairs to any BACT valve, flange/connection or compressor seal (if monitoring possible) showing above 10,000 ppm above ambient to be made on the schedule(s) detailed in Rule 331.		*Gas Compressor Skid Unit No. CZZ-306
			*ATC 9828 Topsides Installation
			*Amine Fuel Gas Treating System
<i>Fugitive I&amp;M Program</i>	Leak detection and repair program consistent with the requirements of the <i>Fugitive Hydrocarbon Emissions Components</i> condition of this permit.		*Gas Compressor Skid Unit No. CZZ-306
			*ATC 9828 Topsides Installation
			*Amine Fuel Gas Treating System

**Table 4.2 Rule 331 BACT Requirements for Specific Components**

Tag No.	Component Type	Component Location	Plant/P&ID	BACT Install Date	BACT Performance Standard
HE-7142	Compressor Seal	Gasket between cylinder #2 and first distance piece on main gas compressor (CZZ-303). Gasket rated at 150% of actual process pressure at process temperature.	HE X-93	1/22/1996	100 ppmv
HE-23086	Compressor Seal	Cylinder to distance piece on CZZ-304 Main Gas Compressor CZZ-304 Cyl. #6	HE X-93	3/3/2009	100 ppmv
HE-7961	Compressor Seal	On injection gas compressor CZZ-311 Cyl. #1 discharge valve cover. Low emission compressor seal design.	HE X-45	11/16/1998	100 ppmv
HE-7962	Compressor Seal	On injection gas compressor CZZ-311 Cyl. #2 discharge valve cover. Low emission compressor seal design.	HE X-45	11/16/1998	100 ppmv
HE-7963	Compressor Seal	Compressor CZZ-311 at cover plate at bottom of cyl. 3.	HE-X45	11/11/1996	100 ppmv
HE-1877	Other	Flange on top of valve at depropanizer	HE X-39	3/9/1997	100 ppmv
HE-828	Other	1" Thr. Pipe Connection off of main gas compressor (stripping gas line to glycol regeneration section)	HE X-37	5/2/1995	100 ppmv
HE-8286	Other	(SA-1) Leaking packing on manual block valve for gas lift at Heritage.	HE X-1129	3/6/2012	100 ppmv
HE-917	Other	(FE-761) Leaking back cap on gas injection flow meter at Heritage.	HE X-46	5/6/2013	100 ppmv
HE-9322	Other	(FE-793) Leaking sealing bar gasket on sales gas flow meter at Heritage.	HE X-44	11/29/2010	100 ppmv
HE-10344	Valve	Stem on 3" flanged choke valve (FV-726) on injection gas line to HE-2	HE X-11	4/30/1995	100 ppmv
HE-1625	Valve	Packing	X-35	11/2/1999	100 ppmv
HE-1871	Valve	Fisher 4" flanged level device for flow control on line from MBD-121 to MBA-194. Low emissions packing design.	HE-X39	2/13/1996	100 ppmv

Tag No.	Component Type	Component Location	Plant/P&ID	BACT Install Date	BACT Performance Standard
HE-20041	Valve	3" shutdown Ball valve in GHX gas service at compressor CZZ-306 N. cylinder. Low emissions packing design.	HE X-42	2/22/1999	100 ppmv
HE-20827	Valve	SA-6 Gas Lift Header	HE X-11A	10/19/2003	100 ppmv
HE-23007	Valve	MBL-305C suction bottle west drain valve (1" 3000# ball valve)	HE X-42	5/4/2006	100 ppmv
HE-3728	Valve	4" level control valve LV 121 serving MBD 124	HA X-39	7/30/1998	100 ppmv
HE-5329	Valve	(BDV-799) Leaking stem seal of 2" remotely operated b/d valve on gas injection header at Heritage.	HE-X111B	8/23/2010	100 ppmv
HE-5403	Valve	2" Ball valve BAX 101 packing on main gas lift header to HE-02 well.	HE X-1102	7/10/1998	100 ppmv
HE-5418	Valve	BAX Ball Valve Stem Packing Gas Lift Manifold #707	HE X-1107	1/6/2003	100 ppmv
HE-5419	Valve	4" flanged AOV 707-2 wellbay diverter ball valve (FMC, formerly National Oil Well) API 3000 in sour service on production line from well HE-5 manifold in cellar deck mezzanine (west end); stem packing leak. Max allow work pressure 6000 psig at operating temp of 123 deg F.	HE X-11	3/9/1997	100 ppmv
HE-5433	Valve	BAX - G/L to HE-32 Gas Lift Manifold #712	HE X-1112	3/24/2003	100 ppmv
HE-5522	Valve	Plunger assembly on the 4" AOV 743-2 wellbay diverter valve on production line from well HE-1. Low emissions packing design.	HE X-11	1/21/1996	100 ppmv
Tag No.	Component Type	Component Location	Plant/P&ID	BACT Install Date	BACT Performance Standard
HE-5640	Valve	Seal on 3" Apollo ANSI 600 class ball valve on bypass line around PSV-362 off of pump PBA-362 (depropanizer bottoms pump).	HE X-40	11/27/1996	100 ppmv
HE-7113	Valve	Packing on AOV on CZZ-305 off Cylinder #1.	HE X-42	7/2/2000	100 ppmv
HE-7702	Valve	Packing on PSV-310-1 & BDV 310-2 Bypass	HE X-45	3/10/2001	100 ppmv
HE-7748	Valve	East flange on 6" orbit valve in sour service on the discharge line from the injection gas compressor CZZ-310 going from the discharge of the compressor to the injection gas cooler system. Low emissions packing design.	HE X-45	4/12/1996	100 ppmv
HE-7842	Valve	Stem packing leak on 2" blowdown valve #311-2 (Argus ball valve) on blowdown gas line from compressor CZZ-311. Low emissions packing design.	HE X-45	8/29/1995	100 ppmv
HE-8243	Valve	SS G/L Production Header	HE -X1124	3/24/2003	100 ppmv
HE-8328	Valve	Ball valve packing on HE-7 Gas Lift Header	HE X-1145	10/19/2003	100 ppmv
HE-8435	Valve	Packing on 4" Ball valve south of control panel upper mezzanine cellar. Low emissions packing design.	HE X-14	8/19/1998	100 ppmv
HE-8435	Valve	Block valve packing leak on G/L Manifold System	HE X-14	10/19/2003	100 ppmv
HE-8541	Valve	Ball valve on gas lift line to Heritage wells 741-760	HE X-15	2/23/2000	100 ppmv
HE-9577	Valve	Packing on Gas Lift Header on PT-746-2.	HE X-1148	1/8/2001	100 ppmv
HE-9577	Valve	HE-13 Gas Lift Header	HE X-1148	10/19/2003	100 ppmv

**Table 4.3 Source Test Requirements**

<b>SOURCE TEST REQUIREMENTS</b>			
<b>Emission &amp; Limit Test Points</b>	<b>Pollutants</b>	<b>Parameters<sup>(b)</sup></b>	<b>Test Methods<sup>(a),(c)</sup></b>
Crane Engines, Crew Boat Main Engines, Supply Boat Main Engines, Central Process Heater, Cement Pump Engines, & Cutting Reinjection Engine	NO <sub>x</sub>	ppmv, lb/hr	EPA Method 7E, ARB 1-100
	ROC	ppmv, lb/hr	EPA Method 18
	CO	ppmv, lb/hr	EPA Method 10, ARB 1-100
	Sampling Point Det. Stack Gas Flow Rate O <sub>2</sub> Moisture Content	Dry, Mol. Wt	EPA Method 1 EPA Method 2 or 19 EPA Method 3 EPA Method 4
Fuel Gas	Fuel Gas Flow Rate Higher Heating Value Total Sulfur Content <sup>(d)</sup>	BTU/scf	Fuel Gas Meter <sup>(f)</sup> ASTM D 1826-88 ASTM D 1072

**Notes:**

(a) All emissions tests to consist of three 40-minute runs. Crane engine tests to consist of three 20-minute runs performed at maximum safe load. Crew and supply boat main engines to be tested at cruise load. Crew boat test runs may be shortened based on prior approval by the APCD. The engine RPM and boat speed shall be recorded during each test run.

(b) The specific project crew and supply boat to be tested shall be determined by the APCD.

(c) USEPA methods 1-4 to be used to determine O<sub>2</sub>, dry MW, moisture content, CO<sub>2</sub>, and stack flow rate. Alternatively, USEPA 19 may be used to determine stack flow rate.

(d) SO<sub>x</sub> emissions to be determined by mass balance calculation.

(e) The main engines from one crew and one supply boat shall be tested annually. The crane engine and central process heater shall be tested biennially.

(f) Procedures to obtain the required operating loads shall be clearly defined in the source test plan.

(g) Source tests on the cement pumps and the cutting reinjection pump are only required if triggered by Rule 333.I.8.

## 5.0 Emissions

### 5.1. **General**

Emissions calculations are divided into "permitted" and "exempt" categories. Permit exempt equipment is determined by District Rule 202. The permitted emissions for each emissions unit is based on the equipment's potential-to-emit (as defined by Rule 102). Section 5.2 details the permitted emissions for each emissions unit. Section 5.3 details the overall permitted emissions for the facility based on reasonable worst-case scenarios using the potential-to-emit for each emissions unit. Section 5.4 provides the federal potential to emit calculation using the definition of potential to emit used in Rule 1301. Section 5.5 provides the estimated emissions from permit exempt equipment and also serves as the Part 70 list of insignificant emission. In order to accurately track the emissions from a facility, the District uses a computer database. Attachment 10.3 contains the District's documentation for the information entered into that database.

### 5.2. **Permitted Emission Limits – Emission Units**

Each emissions unit associated with the facility was analyzed to determine the potential-to-emit for the following pollutants:

- Nitrogen Oxides (NO<sub>x</sub>)<sup>2</sup>
- Reactive Organic Compounds (ROC)
- Carbon Monoxide (CO)
- Sulfur Oxides (SO<sub>x</sub>)<sup>3</sup>
- Particulate Matter (PM)<sup>4</sup>
- Particulate Matter smaller than 10 microns (PM<sub>10</sub>)
- Particulate Matter smaller than 2.5 microns (PM<sub>2.5</sub>)
- Greenhouse Gases (GHG)

Permitted emissions are calculated for both short term (hourly and daily) and long term (quarterly and annual) time periods. Section 4.0 (Engineering Analysis) provides a general discussion of the basic calculation methodologies and emission factors used. The reference documentation for the specific emission calculations may be found in Section 4 and Attachment 10.1. Table 5.1 provides the basic operating characteristics. Table 5.2 provides the specific emission factors. Tables 5.3 and 5.4 shows the permitted short-term and permitted long-term emissions for each unit or operation. In the table, the last column indicates whether the emission limits are federally enforceable. Those emissions limits that are federally enforceable are indicated by the symbol "FE". Those emissions limits that are District-only enforceable are indicated by the symbol "A". Emissions data that are shown for informational purposes only are not enforceable (District or federal) and are indicated by the symbol "NE".

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<sup>2</sup> Calculated and reported as nitrogen dioxide (NO<sub>2</sub>)

<sup>3</sup> Calculated and reported as sulfur dioxide (SO<sub>2</sub>)

<sup>4</sup> Calculated and reported as all particulate matter smaller than 100 μm

### 5.3. **Permitted Emission Limits – Facility Totals**

The total potential-to-emit for all emission units associated with the facility was analyzed. This analysis looked at the reasonable worst-case operating scenarios for each operating period. The equipment operating in each of the scenarios is revised from the previous Part 70/PTO 9102 to account for the new Tier II engines for the *M/V Broadbill*. Unless otherwise specified, the operating characteristics defined in Table 5.1 for each emission unit are assumed. Table 5.5 shows the total permitted emissions for the facility. The total permitted quarterly and annual emissions for the facility are decreased based on the *M/V Broadbill* being operated forty percent (40%) of the annual total DPV crew boat usage. Fugitive hydrocarbon emissions have also increased due to the permittee adding previously *de minimis* components to the permitted equipment list.

#### Hourly and Daily Scenarios:

- Pedestal crane engine
- Firewater Pump Engines
- Emergency Generator Engine
- Cement Pump and Cuttings Reinjection Pump Engines
- Emergency Drilling Engine
- Central Process Heater
- Flare Purge and Pilot
- Planned continuous flaring (minus the purge/pilot volumes)
- Spot charter uncontrolled crew and supply boats
- Generator engines on crew and supply boats provide half of maximum engine rating
- Bow thruster on supply boat does not operate during peak hour
- Survival Capsule Engines
- Fugitive components
- Oil pig launcher/receivers
- Gas pig launcher/receiver
- Open/Closed drain sumps, wellbay sump, skim pile, amine sump
- Drill deck settling tank, chemical storage tote tanks
- Solvent usage
- Degreaser usage

#### Quarterly and Annual Scenario:

- Pedestal crane engine
- Firewater Pump Engines
- Emergency Generator Engine
- Cement Pump and Cuttings Reinjection Pump Engines
- Emergency Drilling Engine
- Central process heater
- Flare Purge and Pilot
- Planned continuous flaring

- Planned intermittent (other) flaring
- Unplanned flaring
- Fugitive components
- Controlled and uncontrolled (spot-charter) supply boats
- Generator engines on crew and supply boats provide half of maximum engine rating
- Bow thruster on supply boat
- Survival Capsule Engines
- Oil pig launcher/receivers
- Gas pig launcher/receiver
- Open/Closed drain sumps, wellbay sump, skim pile, amine sump
- Drill deck settling tank, chemical storage tote tanks
- Solvent usage
- Degreaser usage

**5.4. Part 70: Federal Potential to Emit for the Facility**

Table 5.6 lists the federal Part 70 potential to emit. Being subject to the OCS Air Regulation, all project emissions, except fugitive emissions, are counted in the federal definition of potential to emit. However, fugitives are counted in the Federal PTE if the facility is subject to any applicable NSPS or NESHAP requirement.

**5.5. Exempt Emission Sources/Part 70 Insignificant Emissions**

Equipment/activities exempt pursuant to Rule 202 include maintenance operations involving surface coating. Insignificant emission units are defined under District Rule 1301 as any regulated air pollutant emitted from the unit, excluding HAPs, that are less than 2 tons per year based on the unit's potential to emit and any HAP regulated under section 112(g) of the Clean Air Act that does not exceed 0.5 ton per year based on the unit's potential to emit. The following emission units are exempt from permit per Rule 202, but are not considered insignificant emission units, since these exceed the insignificant emissions threshold.

Table 5.7 presents the estimated annual emissions from these exempt equipment items, including those exempt items not considered insignificant. This permit includes the Solvents/Surface coating activities during maintenance operations.

**5.6. Part 70: Hazardous Air Pollutant Emissions for the Facility**

Total emissions of hazardous air pollutants (HAP) are computed based on the factors listed in Table 5.8-1 for each emissions unit. Potential Facility HAP emissions are shown in Table 5.8-2. Stationary Source HAP emissions are shown in in Table 5.8-3. These are based on a combination of the worst-case scenario listed in Section 5.3. These totals are estimates only, they are not limitations.



### 5.7. **Entire Source Emissions (ESE)**

The permittee is required to mitigate all ozone precursor emissions (NO<sub>x</sub> and ROC) from emission units associated with the Santa Ynez Expansion Project <sup>5</sup>. Table 5.9 presents the ESE associated with the Santa Ynez Expansion Project. The ESE is calculated based on the following:

- Las Flores Canyon Permitted Emissions
- Las Flores Canyon Phase III Oil and Phase III Wastewater
- Las Flores Canyon Exempt Emissions
- Platform Harmony Permitted Emissions
- Platform Harmony Exempt Emissions
- Platform Heritage Permitted Emissions
- Platform Heritage Exempt Emissions

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<sup>5</sup> Platform Hondo and the POPCO gas plant emissions are not included in ESE emissions as they were not part of the SYU Expansion Project.

**Table 5.1 Operating Equipment Description**

Table 5.1: Operating Equipment Description  
Platform Heritage  
PT-70 Reeval 9102-R8

Equipment Item	Description			Device Specifications				Usage Data			Maximum Operating Schedule				References
	Operator ID #	District Device No		Fuel	%S	Size	Units	Capacity	Units	Load	hr	day	qtr	year	
Stationary Internal Combustion Engines (Table A)	Pedestal Crane East	ZZZ-507	005350	D2	0.0015	450	bhp	6,480	Btu/bhp-hr	--	1	24	1,095	4,380	A
	Emergency Production Generator	ZAN-515	005371	D2	0.0015	1,344	bhp	6,480	Btu/bhp-hr	--	1	2	200	200	
	Firewater Pump	PBE-357	005372	D2	0.0015	400	bhp	6,480	Btu/bhp-hr	--	1	2	200	200	
	Firewater Pump	PBE-367	007143	D2	0.0015	525	bhp	6,480	Btu/bhp-hr	--	1	2	200	200	
	Emergency Drilling Engine	ZAN-515	005370	D2	0.0015	2,307	bhp	8,200	Btu/bhp-hr	--	1	2	200	200	
	B - Side Cement Pumping Skid		112508	D2	0.0015	500	bhp	7,500	Btu/bhp-hr	--	1	24	2,190	8,760	
	C - Side Cement Pumping Skid		112507	D2	0.0015	500	bhp	7,500	Btu/bhp-hr	--	1	24	2,190	8,760	
Cuttings Reinjection Pump		386492	D2	0.0015	450	bhp	7,524	Btu/bhp-hr	--	1	24	2,190	8,760		
Combustion - External	Central Process Heater	EAP-603	005353	PG	0.0030	27.2	MMBtu/hr	--	--	--	1	24	2,190	8,760	B
	Central Process Heater (PR)	EAP-603	005353	PR	0.0165	27.2	MMBtu/hr	--	--	--	1	6	80	320	
Flare Relief System (Table J)	Purge and Pilot		102382	PG	0.0030	445	scfh	0.579	MMBtu/hr	--	1	24	2,190	8,760	C
	Planned - Continuous		102383	SG	2.0000	607	scfh	0.789	MMBtu/hr	--	1	24	2,190	8,760	
	Planned - Other		102384	SG	2.0000	3,820	MMBtu/hr	6.300	MMscf/yr	--	--	--	0	1	
	Unplanned		102385	SG	2.0000	3,820	MMBtu/hr	34.000	MMscf/yr	--	--	--	0	1	
Fugitive Components - Gas															
Valve/Connection	Accessible		102526	--	--	7,679	comp-lp	--	--	--	1	24	2,190	8,760	D
Valve/Connection	Category B		102527	--	--	6,112	comp-lp	--	--	--	1	24	2,190	8,760	
Valve/Connection	Category C		104948	--	--	488	comp-lp	--	--	--	1	24	2,190	8,760	
Valve/Connection	Category F		104943	--	--	3,168	comp-lp	--	--	--	1	24	2,190	8,760	
Valve/Connection	Unsafe		102529	--	--	81	comp-lp	--	--	--	1	24	2,190	8,760	
Valve/Connection	Exempt		102536	--	--	25	comp-lp	--	--	--	1	24	2,190	8,760	
						sub-total =	17,553								
Fugitive Components - Oil															
Valve/Connection	Accessible		102516	--	--	11,507	comp-lp	--	--	--	1	24	2,190	8,760	
Valve/Connection	Category B		102520	--	--	55	comp-lp	--	--	--	1	24	2,190	8,760	
Valve/Connection	Category F		102517	--	--	1,345	comp-lp	--	--	--	1	24	2,190	8,760	
Valve/Connection	Unsafe		104950	--	--	5	comp-lp	--	--	--	1	24	2,190	8,760	
Pump Seal	Dual/Tandem		102518	--	--	6	comp-lp	--	--	--	1	24	2,190	8,760	
Valve/Connection	Exempt		102525	--	--	20	comp-lp	--	--	--	1	24	2,190	8,760	
						sub-total =	12,938								

Equipment Item	Description			Device Specifications				Usage Data			Maximum Operating Schedule				References
		Operator ID #	District Device No	Fuel	%S	Size	Units	Capacity	Units	Load	hr	day	qtr	year	
Supply Boat	Main Engine - DPV		005357	D2	0.0015	4,000	bhp-total	0.055 gal/bhp-hr	0.65	1	22	422	1,687	E	
	Main Engine - Spot Charter		104959	D2	0.0015	4,000	bhp-total	0.055 gal/bhp-hr	0.65	1	22	42	169		
	Generator Engine - DPV		005358	D2	0.0015	400	bhp-total	0.055 gal/bhp-hr	0.50	1	22	534	2,137		
	Bow Thruster - DPV		005359	D2	0.0015	500	bhp-total	0.055 gal/bhp-hr	1.00	1	3	73	291		
	Winch - DPV		104962	D2	0.0015	409	bhp-total	0.055 gal/bhp-hr	1.00	1	3	73	291		
	Emergency Response (Main)		386556	D2	0.0015	2,900	bhp-total	0.055 gal/bhp-hr	0.65	--	--	18	72		
	Emergency Response (Aux)		386556	D2	0.0015	89	bhp-total	0.055 gal/bhp-hr	0.50	--	--	18	72		
Survival Capsules	Survival Capsule #1	ZZZ-514	103956	D2	0.0015	55	bhp	0.055 gal/bhp-hr	0.40	1	24	50	200		
	Survival Capsule #2	ZZZ-513	103957	D2	0.0015	55	bhp	0.055 gal/bhp-hr	0.40	1	24	50	200		
	Survival Capsule #3	ZZZ-509	103958	D2	0.0015	30	bhp	0.055 gal/bhp-hr	0.40	1	24	50	200		
Crew Boat	Main Engine - DPV		005361	D2	0.0015	3,860	bhp-total	0.055 gal/bhp-hr	0.85	1	22	197	790	F	
	Main Engines - DPV Broadbill		107900	D2	0.0015	2,400	bhp-total	0.055 gal/bhp-hr	0.85	1	22	212	847		
	Main Engine - Spot Charter		104960	D2	0.0015	3,860	bhp-total	0.055 gal/bhp-hr	0.85	1	22	33	132		
	Auxiliary Engine - DPV		005362	D2	0.0015	262	bhp-total	0.055 gal/bhp-hr	0.50	1	22	840	3,360		
	Auxiliary Engine - DPV Broadbill		107901	D2	0.0015	124	bhp-total	0.055 gal/bhp-hr	0.50	1	22	1,183	4,733		
Pigging Equipment (Table F)	Emulsion Pig Launcher	KAH-791	102539			48	acf	1	psig	1	5	40	175	G	
	Gas Pig Launcher	KAH-793	102540			20	acf	1	psig	1	5	26	104		
Sumps (Table N)	Closed Drain Sump	MBH-132	005363	--	--	90	ft <sup>2</sup>	--	--	--	1	24	2,190	8,760	H
	Open Drain Sump	ABH-406	005364	--	--	90	ft <sup>2</sup>	--	--	--	1	24	2,190	8,760	
	Wellbay Drain Sump	ABH-405	005365	--	--	90	ft <sup>2</sup>	--	--	--	1	24	2,190	8,760	
	Amine Sump	MBH-170	005366	--	--	42	ft <sup>2</sup>	--	--	--	1	24	2,190	8,760	
	Skim Pile	ABH-416	005367	--	--	16	ft <sup>2</sup>	--	--	--	1	24	2,190	8,760	
Storage Tanks (Table C-1)	Drilling Settling Tank	ABJ-417	005368	--	--	200	ft <sup>2</sup>	--	--	--	1	24	2,190	8,760	
	Chemical Storage Tote Tanks		102381	--	--	varies	gal	--	--	--	1	24	2,190	8,760	
Solvent Usage	Cleaning/degreasing		005369	--	--	various		various	--	--	1	24	2,190	8,760	I

**Table 5.2 Equipment Emission Factors**

Table 5.2: Equipment Emission Factors  
Platform Heritage  
PT-70 Reeval 9102-R8

Equipment Item	Description			Emission Factors								References	
	Operator ID #	District Device No		NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	GHG		Units
Stationary Internal Combustion Engines (Table A)	Pedestal Crane East	ZZZ-507	005350	2.696	0.302	0.116	0.0015	0.3100	0.3100	0.3100	163.60	lb/MMBtu	A
	Emergency Production Generator	ZAN-515	005371	14.061	1.120	3.030	0.0045	1.0000	1.0000	1.0000	556.58	g/bhp-hr	
	Firewater Pump	PBE-357	005372	14.061	1.120	3.030	0.0045	1.0000	1.0000	1.0000	556.58	g/bhp-hr	
	Firewater Pump	PBE-367	007143	14.061	1.120	3.030	0.0045	1.0000	1.0000	1.0000	556.58	g/bhp-hr	
	Emergency Drilling Engine	ZAN-515	005370	14.061	1.120	3.030	0.0057	1.0000	1.0000	1.0000	556.58	g/bhp-hr	
	B - Side Cement Pumping Skid		112508	2.800	0.200	2.600	0.0052	0.1500	0.1500	0.1500	556.58	g/bhp-hr	
	C - Side Cement Pumping Skid		112507	2.800	0.200	2.600	0.0052	0.1500	0.1500	0.1500	556.58	g/bhp-hr	
Cuttings Reinjection Pump		386559	3.500	0.250	3.250	0.0050	0.1875	0.1875	0.1875	556.58	g/bhp-hr		
Combustion - External	Central Process Heater	EAP-603	005353	0.036	0.0054	0.297	0.004	0.0075	0.0075	0.008	117.00	lb/MMBtu	B
	Central Process Heater (PR)	EAP-603	005353	0.036	0.0054	0.297	0.011	0.0075	0.0075	0.008	117.00	lb/MMBtu	
Flare Relief System (Table J)	Purge and Pilot		102382	0.068	0.12	0.37	0.004	0.020	0.020	0.020	117.00	lb/MMBtu	C
	Planned - Continuous		102383	0.068	0.12	0.37	2.600	0.020	0.020	0.020	117.00	lb/MMBtu	
	Planned - Other		102384	0.068	0.12	0.37	2.600	0.020	0.020	0.020	117.00	lb/MMBtu	
	Unplanned		102385	0.068	0.12	0.37	2.600	0.020	0.020	0.020	117.00	lb/MMBtu	
Fugitive Components - Gas													
Valve/Connection	Accessible		102526	--	0.0147	--	--	--	--	--	--	lb/day-clp	D
Valve/Connection	Category B		102527	--	0.0110	--	--	--	--	--	--	lb/day-clp	
Valve/Connection	Category C		104948	--	0.0096	--	--	--	--	--	--	lb/day-clp	
Valve/Connection	Category F		104943	--	0.0074	--	--	--	--	--	--	lb/day-clp	
Valve/Connection	Unsafe		102529	--	0.0736	--	--	--	--	--	--	lb/day-clp	
Valve/Connection	Exempt		102536	--	0.0000	--	--	--	--	--	--	lb/day-clp	
Fugitive Components - Oil													
Valve/Connection	Accessible		102516	--	0.0009	--	--	--	--	--	--	lb/day-clp	D
Valve/Connection	Category B		102520	--	0.0007	--	--	--	--	--	--	lb/day-clp	
Valve/Connection	Category F		102517	--	0.0004	--	--	--	--	--	--	lb/day-clp	
Valve/Connection	Unsafe		104950	--	0.0044	--	--	--	--	--	--	lb/day-clp	
Pump Seal	Dual/Tandem		102518	--	0.0000	--	--	--	--	--	--	lb/day-clp	
	Exempt		102525	--	0.0000	--	--	--	--	--	--	lb/day-clp	

Equipment Item	Description			Emission Factors									References
	Operator ID #	District Device No		NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	GHG	Units	
Supply Boat <sup>1, 2</sup>			005357	337.00	16.80	78.30	0.2073	33.00	31.68	31.68	22,309.60	lb/1000 gal	E
				561.00	16.80	78.30	0.2073	33.00	31.68	31.68	22,309.60	lb/1000 gal	
			005358	600.00	49.00	129.30	0.2073	42.20	40.51	40.51	22,309.60	lb/1000 gal	
			005359	600.00	49.00	129.30	0.2073	42.20	40.51	40.51	22,309.60	lb/1000 gal	
			104962	600.00	49.00	129.30	0.2073	42.20	40.51	40.51	22,309.60	lb/1000 gal	
			386556	271.00	10.76	149.51	0.2073	6.00	6.00	6.00	22,309.60	lb/1000 gal	
			386556	213.24	11.22	164.34	0.2073	18.00	18.00	18.00	22,309.60	lb/1000 gal	
Survival Capsules		ZZZ-514	103956	561.00	17.10	78.30	0.2073	33.00	31.68	31.68	22,309.60	lb/1000 gal	
		ZZZ-513	103957	561.00	17.10	78.30	0.2073	33.00	31.68	31.68	22,309.60	lb/1000 gal	
		ZZZ-509	103958	561.00	17.10	78.30	0.2073	33.00	31.68	31.68	22,309.60	lb/1000 gal	
Crew Boat <sup>1, 2</sup>			005361	337.00	17.10	80.90	0.2073	33.00	31.68	31.68	22,309.60	lb/1000 gal	F
			104960	218.98	17.10	80.90	0.2073	5.93	5.93	5.93	22,309.60	lb/1000 gal	
				561.00	17.10	80.90	0.2073	33.00	31.68	31.68	22,309.60	lb/1000 gal	
				600.00	48.98	129.26	0.2073	42.18	40.49	40.49	22,309.60	lb/1000 gal	
				217.87	48.98	129.26	0.2073	5.93	5.93	5.93	22,309.60	lb/1000 gal	
Pigging Equipment (Table F)		KAH-791	102539	--	0.018	--	--	--	--	--	--	lb/acf-evt	G
		KAH-793	102540	--	0.018	--	--	--	--	--	--	lb/acf-evt	
Sumps (Table N)		MBH-132	005363	--	0.001	--	--	--	--	--	--	lb/ft <sup>2</sup> -day	H
		ABH-406	005364	--	0.002	--	--	--	--	--	--	lb/ft <sup>2</sup> -day	
		ABH-405	005365	--	0.002	--	--	--	--	--	--	lb/ft <sup>2</sup> -day	
		MBH-170	005366	--	0.001	--	--	--	--	--	--	lb/ft <sup>2</sup> -day	
		ABH-416	005367	--	0.002	--	--	--	--	--	--	lb/ft <sup>2</sup> -day	
Storage Tanks (Table C-1)		ABJ-417	005368	--	0.002	--	--	--	--	--	--	lb/ft <sup>2</sup> -day	
			102381	--	0.100	--	--	--	--	--	--	tons per year	
Solvent Usage			005369	--	various	--	--	--	--	--	--	lb/gal	I

Notes:

<sup>1</sup> For emission calculations and fuel use reporting, the main engines on dedicated project vessels are treated as controlled engines.

<sup>2</sup> For emission calculations and fuel use reporting, all spot charter vessels are treated as uncontrolled engines.

**Table 5.3 Hourly and Daily Emissions**

Table 5.3: Hourly and Daily Emissions  
Platform Heritage  
PT-70 Reeval 9102-R8

Equipment Item	Description		NO <sub>x</sub>		ROC		CO		SO <sub>x</sub>		PM		PM <sub>10</sub>		PM <sub>2.5</sub>		GHG		Federal			
	Operator ID #	District Device No	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	Enforceability			
Stationary Internal Combustion Engines (Table A)	Pedestal Crane East	ZZZ-507	005350	8.33	200.00	0.93	22.37	0.36	8.61	0.00	0.11	0.96	23.00	0.96	23.00	0.96	23.00	505.68	12,136.35	FE		
	Emergency Production Generator	ZAN-515	005371	41.66	83.33	3.32	6.64	8.98	17.96	0.01	0.03	2.96	5.93	2.96	5.93	2.96	5.93	1,649.13	3,298.25	FE		
	Firewater Pump	PBE-357	005372	12.40	24.80	0.99	1.98	2.67	5.34	0.00	0.01	0.88	1.76	0.88	1.76	0.88	1.76	490.81	981.62	FE		
	Firewater Pump	PBE-367	007143	16.27	32.55	1.30	2.59	3.51	7.01	0.01	0.01	1.16	2.31	1.16	2.31	1.16	2.31	644.19	1,288.38	FE		
	Emergency Drilling Engine	ZAN-515	005370	71.52	143.03	5.70	11.40	15.41	30.82	0.03	0.06	5.09	10.17	5.09	10.17	5.09	10.17	2,830.75	5,661.51	FE		
	B - Side Cement Pumping Skid		112508	3.09	74.07	0.22	5.29	2.87	68.78	0.01	0.14	0.17	3.97	0.17	3.97	0.17	3.97	613.51	14,724.34	FE		
	C - Side Cement Pumping Skid		112507	3.09	74.07	0.22	5.29	2.87	68.78	0.01	0.14	0.17	3.97	0.17	3.97	0.17	3.97	613.51	14,724.34	FE		
Cuttings Reinjection Pump		386559	3.47	83.33	0.25	5.95	3.22	77.38	0.00	0.12	0.19	4.46	0.19	4.46	0.19	4.46	552.16	13,251.90	FE			
Combustion - External	Central Process Heater	EAP-603	005353	0.98	23.50	0.15	3.52	8.08	193.88	0.11	2.55	0.20	4.90	0.20	4.90	0.20	4.90	3,182.40	76,377.60	FE		
	Central Process Heater (PR)	EAP-603	005353	0.98	5.88	0.15	0.88	8.08	48.47	0.30	1.80	0.20	1.22	0.20	1.22	0.20	1.22	3,182.40	19,094.40	FE		
Flare Relief System (Table J)	Purge and Pilot		102382	0.04	0.94	0.07	1.67	0.21	5.14	0.00	0.05	0.01	0.28	0.01	0.28	0.01	0.28	67.68	1,624.43	FE		
	Planned - Continuous		102383	0.05	1.29	0.10	2.28	0.29	7.01	2.05	49.24	0.02	0.38	0.02	0.38	0.02	0.38	92.32	2,215.79	FE		
	Planned - Other		102384	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	NE		
	Unplanned		102385	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Fugitive Components - Gas																						
Valve/Connection	Accessible		102526	--	--	4.70	112.88	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Valve/Connection	Category B		102527	--	--	2.80	67.23	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Valve/Connection	Category C		104948	--	--	0.20	4.68	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Valve/Connection	Category F		104943	--	--	0.98	23.44	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Valve/Connection	Unsafe		102529	--	--	0.25	5.96	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Valve/Connection	Exempt		102536	--	--	0.00	0.00	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Subtotal:																						
						8.93	214.20															FE
Fugitive Components - Oil																						
Valve/Connection	Accessible		102516	--	--	0.432	10.36	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Valve/Connection	Category B		102520	--	--	0.002	0.04	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Valve/Connection	Category F		102517	--	--	0.022	0.54	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Valve/Connection	Unsafe		104950	--	--	0.001	0.02	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Pump Seal	Dual/Tandem		102518	--	--	0.000	0.00	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Pump Seal	Exempt		102525	--	--	0.000	0.00	--	--	--	--	--	--	--	--	--	--	--	--	NE		
Subtotal:																						
						0.46	10.95															FE

Equipment Item	Description			NO <sub>x</sub>		ROC		CO		SO <sub>x</sub>		PM		PM <sub>10</sub>		PM <sub>2.5</sub>		GHG		Federal	
	Operator ID #	District Device No		lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	Enforceability	
Supply Boat	Main Engine - DPV		005357	48.19	1,060.20	2.40	52.85	11.20	246.33	0.03	0.65	4.72	103.82	4.53	99.67	4.53	99.67	3,190.27	70,186.00	FE	
	Main Engine - Spot Charter			80.22	1,764.91	2.40	52.85	11.20	246.33	0.03	0.65	4.72	103.82	4.53	99.67	4.53	99.67	3,190.27	70,186.00		
	Generator Engine - DPV		005358	6.60	145.20	0.54	11.86	1.42	31.29	0.00	0.05	0.46	10.21	0.45	9.80	0.45	9.80	245.41	5,398.92	FE	
	Bow Thruster - DPV		005359	16.50	49.50	1.35	4.04	3.56	10.67	0.01	0.02	1.16	3.48	1.11	3.34	1.11	3.34	613.51	1,840.54	FE	
	Winch - DPV		104962	13.50	40.49	1.10	3.31	2.91	8.73	0.00	0.01	0.95	2.85	0.91	2.73	0.91	2.73	501.85	1,505.56	FE	
	Emergency Response (Main)		386556	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	FE
	Emergency Response (Aux)		386556	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	FE
Survival Capsules	Survival Capsule #1	ZZZ-514	103956	0.68	16.29	0.02	0.50	0.09	2.27	0.00	0.01	0.04	0.96	0.04	0.92	0.04	0.92	26.99	647.87	FE	
	Survival Capsule #2	ZZZ-513	103957	0.68	16.29	0.02	0.50	0.09	2.27	0.00	0.01	0.04	0.96	0.04	0.92	0.04	0.92	26.99	647.87	FE	
	Survival Capsule #3	ZZZ-509	103958	0.37	8.89	0.01	0.27	0.05	1.24	0.00	0.00	0.02	0.52	0.02	0.50	0.02	0.50	14.72	353.38	FE	
Crew Boat	Main Engine - DPV		005361	60.81	1,319.65	3.09	66.96	14.60	316.79	0.04	0.81	5.96	129.22	5.72	124.05	5.72	124.05	4,025.88	87,361.57	FE	
	Main Engine - DPV Broadbill		107900	24.57	540.54	1.92	42.21	9.08	199.69	0.02	0.51	0.67	14.63	0.67	14.63	0.67	14.63	2,503.14	55,069.02	FE	
	Main Engine - Spot Charter		106541	101.24	2,196.81	3.09	66.96	14.60	316.79	0.04	0.81	5.96	129.22	5.72	124.05	5.72	124.05	4,025.88	87,361.57		
	Auxiliary Engine - DPV		005362	4.32	93.81	0.35	7.66	0.93	20.21	0.00	0.03	0.30	6.59	0.29	6.33	0.29	6.33	160.74	3,488.07	FE	
	Auxiliary Engine - DPV Broadbill		107901	0.74	16.34	0.17	3.67	0.44	9.70	0.00	0.02	0.02	0.44	0.02	0.44	0.02	0.44	76.08	1,673.67	FE	
Pigging Equipment (Table F)	Emulsion Pig Launcher	KAH-791	102539	--	--	0.87	4.33	--	--	--	--	--	--	--	--	--	--	--	--	FE	
	Gas Pig Launcher	KAH-793	102540	--	--	0.36	1.80	--	--	--	--	--	--	--	--	--	--	--	--	FE	
Sumps (Table N)	Closed Drain Sump	MBH-132	005363	--	--	0.002	0.057	--	--	--	--	--	--	--	--	--	--	--	--	FE	
	Open Drain Sump	ABH-406	005364	--	--	0.007	0.170	--	--	--	--	--	--	--	--	--	--	--	--	FE	
	Wellbay Drain Sump	ABH-405	005365	--	--	0.007	0.170	--	--	--	--	--	--	--	--	--	--	--	--	FE	
	Amine Sump	MBH-170	005366	--	--	0.001	0.026	--	--	--	--	--	--	--	--	--	--	--	--	FE	
	Skim Pile	ABH-416	005367	--	--	0.001	0.030	--	--	--	--	--	--	--	--	--	--	--	--	FE	
Storage Tanks (Table C-1)	Drilling Settling Tank	ABJ-417	005368	--	--	0.016	0.378	--	--	--	--	--	--	--	--	--	--	--	--	FE	
	Chemical Storage Tote Tanks		102381	--	--	0.023	0.550	--	--	--	--	--	--	--	--	--	--	--	--	FE	
Solvent Usage	Cleaning/degreasing		005369	--	--	0.46	10.96	--	--	--	--	--	--	--	--	--	--	--	--	FE	

Notes:

FE = Federally enforceable

AE = APCD-only enforceable

NE = Not enforceable

**Table 5.4 Quarterly and Annual Emissions**

Table 5.4: Quarterly and Annual Emissions  
Platform Heritage  
PT-70 Reeval 9102-R8

Equipment Item	Description		NO <sub>x</sub>		ROC		CO		SO <sub>x</sub>		PM		PM <sub>10</sub>		PM <sub>2.5</sub>		GHG		Federal	
	Operator ID #	District Device No	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	Enforceability	
Stationary Internal Combustion Engines (Table A)	Pedestal Crane East	ZZZ-507	005350	4.56	18.25	0.51	2.04	0.20	0.79	0.00	0.01	0.52	2.10	0.52	2.10	0.52	2.10	276.86	1,107.44	FE
	Emergency Production Generator	ZAN-515	005371	4.17	4.17	0.33	0.33	0.90	0.90	0.00	0.00	0.30	0.30	0.30	0.30	0.30	0.30	164.91	164.91	FE
	Firewater Pump	PBE-357	005372	1.24	1.24	0.10	0.10	0.27	0.27	0.00	0.00	0.09	0.09	0.09	0.09	0.09	0.09	49.08	49.08	FE
	Firewater Pump	PBE-367	007143	1.63	1.63	0.13	0.13	0.35	0.35	0.00	0.00	0.12	0.12	0.12	0.12	0.12	0.12	64.42	64.42	FE
	Emergency Drilling Engine	ZAN-515	005370	7.15	7.15	0.57	0.57	1.54	1.54	0.00	0.00	0.51	0.51	0.51	0.51	0.51	0.51	283.08	283.08	FE
	B - Side Cement Pumping Skid		112508	3.38	13.52	0.24	0.97	3.14	12.55	0.01	0.03	0.18	0.72	0.18	0.72	0.18	0.72	671.80	2,687.19	FE
	C - Side Cement Pumping Skid		112507	3.38	13.52	0.24	0.97	3.14	12.55	0.01	0.03	0.18	0.72	0.18	0.72	0.18	0.72	671.80	2,687.19	FE
	Cuttings Reinjection Pump		386559	3.80	15.21	0.27	1.09	3.53	14.12	0.01	0.02	0.20	0.81	0.20	0.81	0.20	0.81	604.62	2,418.47	FE
Combustion - External	Central Process Heater	EAP-603	005353	1.07	4.29	0.16	0.64	8.85	35.38	0.12	0.46	0.22	0.89	0.22	0.89	0.22	0.89	3,484.73	13,938.91	FE
	Central Process Heater (PR)	EAP-603	005353	0.04	0.16	0.01	0.02	0.32	1.29	0.01	0.05	0.01	0.03	0.01	0.03	0.01	0.03	127.30	509.18	FE
Flare Relief System (Table J)	Purge and Pilot		102382	0.04	0.17	0.08	0.31	0.23	0.94	0.00	0.01	0.01	0.05	0.01	0.05	0.01	0.05	74.11	296.46	FE
	Planned - Continuous		102383	0.06	0.24	0.10	0.42	0.32	1.28	2.25	8.99	0.02	0.07	0.02	0.07	0.02	0.07	101.10	404.38	FE
	Planned - Other		102384	0.06	0.26	0.12	0.50	0.38	1.54	2.70	10.79	0.02	0.08	0.02	0.08	0.02	0.08	121.44	485.75	FE
	Unplanned		102385	0.35	1.39	0.61	2.46	1.89	7.55	13.26	53.04	0.10	0.41	0.10	0.41	0.10	0.41	596.70	2,386.80	FE
Fugitive Components - Gas																				
Valve/Connection	Accessible		102526	--	--	5.15	20.60	--	--	--	--	--	--	--	--	--	--	--	--	NE
Valve/Connection	Category B		102527	--	--	3.07	12.27	--	--	--	--	--	--	--	--	--	--	--	--	NE
Valve/Connection	Category C		104948	--	--	0.21	0.85	--	--	--	--	--	--	--	--	--	--	--	--	NE
Valve/Connection	Category F		104943	--	--	1.07	4.28	--	--	--	--	--	--	--	--	--	--	--	--	NE
Valve/Connection	Unsafe		102529	--	--	0.27	1.09	--	--	--	--	--	--	--	--	--	--	--	--	NE
	Exempt		102536	--	--	0.00	0.00	--	--	--	--	--	--	--	--	--	--	--	--	NE
	Subtotal:					9.77	39.09													FE
Fugitive Components - Oil																				
Valve/Connection	Accessible		102516	--	--	0.473	1.890	--	--	--	--	--	--	--	--	--	--	--	--	NE
Valve/Connection	Category B		102520	--	--	0.002	0.007	--	--	--	--	--	--	--	--	--	--	--	--	NE
Valve/Connection	Category F		102517	--	--	0.025	0.098	--	--	--	--	--	--	--	--	--	--	--	--	NE
Valve/Connection	Unsafe		104950	--	--	0.001	0.004	--	--	--	--	--	--	--	--	--	--	--	--	NE
Pump Seal	Dual/Tandem		102518	--	--	0.000	0.000	--	--	--	--	--	--	--	--	--	--	--	--	NE
	Exempt		102525	--	--	0.000	0.000	--	--	--	--	--	--	--	--	--	--	--	--	NE
	Subtotal:					0.50	2.00													FE



Equipment Category	Description			NO <sub>x</sub>		ROC		CO		SO <sub>x</sub>		PM		PM <sub>10</sub>		PM <sub>2.5</sub>		GHG		Federal Enforceability
				TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	
Supply Boat	Main Engine - DPV		005357	10.16	40.65	0.51	2.03	2.36	9.45	0.01	0.03	1.00	3.98	0.96	3.82	0.96	3.82	672.84	2,691.34	FE
	Main Engine - Spot Charter			1.69	6.77	0.05	0.20	0.24	0.94	0.00	0.00	0.10	0.40	0.10	0.38	0.10	0.38	67.28	269.13	FE
	Subtotal =			11.86	47.42	0.56	2.23	2.60	10.39	0.01	0.03	1.09	4.38	1.05	4.20	1.05	4.20	740.12	2,960.47	FE
	Generator Engine - DPV		005358	1.76	7.05	0.14	0.58	0.38	1.52	0.00	0.00	0.12	0.50	0.12	0.48	0.12	0.48	65.57	262.27	FE
	Bow Thruster - DPV		005359	0.60	2.40	0.05	0.20	0.13	0.52	0.00	0.00	0.04	0.17	0.04	0.16	0.04	0.16	22.35	89.41	FE
	Winch - DPV		104962	0.49	1.97	0.04	0.16	0.11	0.42	0.00	0.00	0.03	0.14	0.03	0.13	0.03	0.13	18.28	73.14	FE
	Emergency Response (Main)		386556	0.25	1.01	0.01	0.04	0.14	0.56	0.00	0.00	0.01	0.02	0.01	0.02	0.01	0.02	20.82	83.27	FE
Emergency Response (Aux)		386556	0.00	0.02	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.49	1.97	FE	
Survival Capsules	Survival Capsule #1	ZZZ-514	103956	0.02	0.07	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.67	2.70	FE
	Survival Capsule #2	ZZZ-513	103957	0.02	0.07	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.67	2.70	FE
	Survival Capsule #3	ZZZ-509	103958	0.01	0.04	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.37	1.47	FE
Crew Boat	Main Engine - DPV		005361	6.00	24.01	0.30	1.22	1.44	5.76	0.00	0.01	0.59	2.35	0.56	2.26	0.56	2.26	397.35	1,589.42	FE
	Main Engine - DPV Broadbill		107900	2.60	10.40	0.20	0.81	0.96	3.84	0.00	0.01	0.07	0.28	0.07	0.28	0.07	0.28	264.90	1,059.61	FE
	Main Engine - Spot Charter		106523	1.67	6.66	0.05	0.20	0.24	0.96	0.00	0.00	0.10	0.39	0.09	0.38	0.09	0.38	66.23	264.90	FE
	Subtotal =			10.27	41.07	0.56	2.23	2.64	10.57	0.01	0.03	0.76	3.02	0.73	2.91	0.73	2.91	728.48	2913.93	FE
	Auxiliary Engine - DPV		005362	1.82	7.26	0.15	0.59	0.39	1.56	0.00	0.00	0.13	0.51	0.12	0.49	0.12	0.49	67.51	270.04	FE
	Auxiliary Engine - DPV Broadbill		107901	0.44	1.76	0.10	0.40	0.26	1.04	0.00	0.00	0.01	0.05	0.01	0.05	0.01	0.05	45.01	180.03	FE
	Subtotal =			2.26	9.02	0.25	0.99	0.65	2.61	0.00	0.00	0.14	0.56	0.13	0.54	0.13	0.54	112.52	450.07	FE
Pigging Equipment (Table F)	Emulsion Pig Launcher	KAH-791	102539	--	--	0.017	0.076	--	--	--	--	--	--	--	--	--	--	--	--	FE
	Gas Pig Launcher	KAH-793	102540	--	--	0.005	0.019	--	--	--	--	--	--	--	--	--	--	--	--	FE
Sumps (Table N)	Closed Drain Sump	MBH-132	005363	--	--	0.003	0.010	--	--	--	--	--	--	--	--	--	--	--	--	FE
	Open Drain Sump	ABH-406	005364	--	--	0.008	0.031	--	--	--	--	--	--	--	--	--	--	--	--	FE
	Wellbay Drain Sump	ABH-405	005365	--	--	0.008	0.031	--	--	--	--	--	--	--	--	--	--	--	--	FE
	Amine Sump	MBH-170	005366	--	--	0.001	0.005	--	--	--	--	--	--	--	--	--	--	--	--	FE
	Skim Pile	ABH-416	005367	--	--	0.001	0.006	--	--	--	--	--	--	--	--	--	--	--	--	FE
Storage Tanks (Table C-1)	Drilling Settling Tank	ABJ-417	005368	--	--	0.017	0.069	--	--	--	--	--	--	--	--	--	--	--	--	FE
	Chemical Storage Tote Tanks		102381	--	--	0.025	0.100	--	--	--	--	--	--	--	--	--	--	--	--	FE
Solvent Usage	Cleaning/degreasing		005369	--	--	0.50	2.00	--	--	--	--	--	--	--	--	--	--	--	--	FE

Notes:  
FE = Federally enforceable  
AE = APCD-only enforceable  
NE = Not enforceable

### Table 5.5 Total Permitted Facility Emissions

Table 5.5: Total Permitted Facility Emissions  
Platform Heritage  
PT-70 Reeval 9102-R8

#### A. Hourly

Equipment Category	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	GHG
Combustion - Engines	159.83	12.92	39.88	0.07	11.56	11.56	11.56	7,899.75
Combustion - External	0.98	0.15	8.08	0.30	0.20	0.20	0.20	3,182.40
Combustion - Flare	0.09	0.16	0.51	2.05	0.03	0.03	0.03	160.01
Fugitive Components	--	9.38	--	--	--	--	--	--
Supply Boat	100.32	4.04	15.53	0.04	6.13	5.89	5.89	3,937.53
Emergency Response	--	--	--	--	--	--	--	--
Survival Capsules	1.73	0.05	0.24	0.00	0.10	0.10	0.10	68.71
Crew Boat	105.56	3.44	15.53	0.04	6.26	6.01	6.01	4,186.62
Pigging	--	1.23	--	--	--	--	--	--
Sumps/Tanks/Separators	--	0.06	--	--	--	--	--	--
Solvent Usage	--	0.46	--	--	--	--	--	--
<b>Totals (lb/hr)</b>	<b>368.51</b>	<b>31.89</b>	<b>79.77</b>	<b>2.50</b>	<b>24.29</b>	<b>23.79</b>	<b>23.79</b>	<b>19,435.03</b>

#### B. Daily

Equipment Category	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	GHG
Combustion - Engines	715.18	61.51	284.69	0.61	55.57	55.57	55.57	66,066.69
Combustion - External	23.50	3.52	193.88	2.55	4.90	4.90	4.90	76,377.60
Combustion - Flare	2.23	3.95	12.14	49.29	0.66	0.66	0.66	3,840.22
Fugitive Components	--	225.16	--	--	--	--	--	--
Supply Boat	2,000.10	72.06	297.02	0.73	120.36	115.55	115.55	78,931.03
Emergency Response	--	--	--	--	--	--	--	--
Survival Capsules	41.47	1.26	5.79	0.02	2.44	2.34	2.34	1,649.13
Crew Boat	2,290.61	74.62	337.00	0.84	135.82	130.39	130.39	90,849.64
Pigging	--	6.13	--	--	--	--	--	--
Sumps/Tanks/Separators	--	1.38	--	--	--	--	--	--
Solvent Usage	--	10.96	--	--	--	--	--	--
<b>Totals (lb/day)</b>	<b>5,073.10</b>	<b>460.56</b>	<b>1,130.52</b>	<b>54.04</b>	<b>319.74</b>	<b>309.40</b>	<b>309.40</b>	<b>317,714.31</b>

#### C. Quarterly

Equipment Category	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	GHG
Combustion - Engines	29.31	2.40	13.06	0.03	2.10	2.10	2.10	2,786.56
Combustion - External	1.07	0.16	8.85	0.12	0.22	0.22	0.22	3,484.73
Combustion - Flare	0.51	0.92	2.83	18.21	0.15	0.15	0.15	893.35
Fugitive Components	--	10.27	--	--	--	--	--	--
Supply Boat	14.71	0.79	3.21	0.01	1.30	1.24	1.24	846.32
Emergency Response	0.26	0.01	0.14	0.00	0.01	0.01	0.01	21.31
Survival Capsules	0.04	0.03	0.03	0.03	0.03	0.03	0.03	1.72
Crew Boat	12.52	0.81	3.29	0.01	0.90	0.86	0.86	841.00
Pigging	--	0.02	--	--	--	--	--	--
Sumps/Tanks/Separators	--	0.06	--	--	--	--	--	--
Solvent Usage	--	0.50	--	--	--	--	--	--
<b>Totals (TPQ)</b>	<b>58.43</b>	<b>15.97</b>	<b>31.41</b>	<b>18.40</b>	<b>4.70</b>	<b>4.62</b>	<b>4.62</b>	<b>8,874.99</b>

#### D. Annual

Equipment Category	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	GHG
Combustion - Engines	74.68	6.19	43.07	0.09	5.37	5.37	5.37	9,461.79
Combustion - External	4.29	0.64	35.38	0.46	0.89	0.89	0.89	13,938.91
Combustion - Flare	2.05	3.68	11.30	72.83	0.61	0.61	0.61	3,573.39
Fugitive Components	--	41.09	--	--	--	--	--	--
Supply Boat	58.85	3.16	12.85	0.03	5.18	4.98	4.98	3,385.29
Emergency Response	1.03	0.04	0.57	0.00	0.02	0.02	0.02	85.23
Survival Capsules	0.17	0.03	0.03	0.03	0.03	0.03	0.03	6.87
Crew Boat	50.09	3.22	13.17	0.03	3.58	3.45	3.45	3,364.01
Pigging	--	0.09	--	--	--	--	--	--
Sumps/Tanks/Separators	--	0.25	--	--	--	--	--	--
Solvent Usage	--	2.00	--	--	--	--	--	--
<b>Totals (TPY)</b>	<b>191.16</b>	<b>60.40</b>	<b>116.38</b>	<b>73.48</b>	<b>15.69</b>	<b>15.36</b>	<b>15.36</b>	<b>33,815.49</b>

**Table 5.6 Federal Potential to Emit**

Table 5.6: Federal Potential to Emit  
Platform Heritage  
PT-70 Reeval 9102-R8

**A. Hourly**

Equipment Category	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	GHG
Combustion - Engines	159.83	12.92	39.88	0.07	11.56	11.56	11.56	7,899.75
Combustion - External	0.98	0.15	8.08	0.30	0.20	0.20	0.20	3,182.40
Combustion - Flare	0.09	0.16	0.51	2.05	0.03	0.03	0.03	160.01
Fugitive Components	--	9.38	--	--	--	--	--	--
Supply Boat	100.32	4.04	15.53	0.04	6.13	5.89	5.89	3,937.53
Emergency Response	--	--	--	--	--	--	--	--
Survival Capsules	1.73	0.05	0.24	0.00	0.10	0.10	0.10	68.71
Crew Boat	105.56	3.44	15.53	0.04	6.26	6.01	6.01	4,186.62
Pigging	--	1.23	--	--	--	--	--	--
Sumps/Tanks/Separators	--	0.06	--	--	--	--	--	--
Solvent Usage	--	0.46	--	--	--	--	--	--
<b>Totals (lb/hr)</b>	<b>368.51</b>	<b>31.89</b>	<b>79.77</b>	<b>2.50</b>	<b>24.29</b>	<b>23.79</b>	<b>23.79</b>	<b>19,435.03</b>

**B. Daily**

Equipment Category	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	GHG
Combustion - Engines	715.18	61.51	284.69	0.61	55.57	55.57	55.57	66,066.69
Combustion - External	23.50	3.52	193.88	2.55	4.90	4.90	4.90	76,377.60
Combustion - Flare	2.23	3.95	12.14	49.29	0.66	0.66	0.66	3,840.22
Fugitive Components	--	225.16	--	--	--	--	--	--
Supply Boat	2,000.10	72.06	297.02	0.73	120.36	115.55	115.55	78,931.03
Emergency Response	--	--	--	--	--	--	--	--
Survival Capsules	41.47	1.26	5.79	0.02	2.44	2.34	2.34	1,649.13
Crew Boat	2,290.61	74.62	337.00	0.84	135.82	130.39	130.39	90,849.64
Pigging	--	6.13	--	--	--	--	--	--
Sumps/Tanks/Separators	--	1.38	--	--	--	--	--	--
Solvent Usage	--	10.96	--	--	--	--	--	--
<b>Totals (lb/day)</b>	<b>5,073.10</b>	<b>460.56</b>	<b>1,130.52</b>	<b>54.04</b>	<b>319.74</b>	<b>309.40</b>	<b>309.40</b>	<b>317,714.31</b>

**C. Quarterly**

Equipment Category	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	GHG
Combustion - Engines	29.31	2.40	13.06	0.03	2.10	2.10	2.10	2,786.56
Combustion - External	1.07	0.16	8.85	0.12	0.22	0.22	0.22	3,484.73
Combustion - Flare	0.51	0.92	2.83	18.21	0.15	0.15	0.15	893.35
Fugitive Components	--	10.27	--	--	--	--	--	--
Supply Boat	14.71	0.79	3.21	0.01	1.30	1.24	1.24	846.32
Emergency Response	0.25	0.01	0.14	0.00	0.01	0.01	0.01	21.31
Survival Capsules	0.04	0.03	0.03	0.03	0.03	0.03	0.03	1.72
Crew Boat	12.52	0.81	3.29	0.01	0.90	0.86	0.86	841.00
Pigging	--	0.02	--	--	--	--	--	--
Sumps/Tanks/Separators	--	0.06	--	--	--	--	--	--
Solvent Usage	--	0.50	--	--	--	--	--	--
<b>Totals (TPQ)</b>	<b>58.43</b>	<b>15.97</b>	<b>31.41</b>	<b>18.40</b>	<b>4.70</b>	<b>4.62</b>	<b>4.62</b>	<b>8,874.99</b>

**D. Annual**

Equipment Category	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	GHG
Combustion - Engines	74.68	6.19	43.07	0.09	5.37	5.37	5.37	9,461.79
Combustion - External	4.29	0.64	35.38	0.46	0.89	0.89	0.89	13,938.91
Combustion - Flare	2.05	3.68	11.30	72.83	0.61	0.61	0.61	3,573.39
Fugitive Components	--	41.09	--	--	--	--	--	--
Supply Boat	58.85	3.16	12.85	0.03	5.18	4.98	4.98	3,385.29
Emergency Response	1.03	0.04	0.57	0.00	0.02	0.02	0.02	85.23
Survival Capsules	0.17	0.03	0.03	0.03	0.03	0.03	0.03	6.87
Crew Boat	50.09	3.22	13.17	0.03	3.58	3.45	3.45	3,364.01
Pigging	--	0.09	--	--	--	--	--	--
Sumps/Tanks/Separators	--	0.25	--	--	--	--	--	--
Solvent Usage	--	2.00	--	--	--	--	--	--
<b>Totals (TPY)</b>	<b>191.16</b>	<b>60.40</b>	<b>116.38</b>	<b>73.48</b>	<b>15.69</b>	<b>15.36</b>	<b>15.36</b>	<b>33,815.49</b>

**Table 5.7 Estimated Permit Exempt Emissions**

Table 5.7  
 Estimated Permit Exempt Emissions  
 Part 70 / Reeval 9102 - R8

**A. Annual**

<b>Equipment Category</b>	<b>NO<sub>x</sub></b>	<b>ROC</b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Welder 70-304	0.11	0.01	0.02	0.01	0.01	0.01	0.01
Air Compressor 380 1906/ Tag #20-212	0.02	0.00	0.00	0.00	0.00	0.00	0.00
Welder RCD-12413 AC	0.08	0.01	0.02	0.01	0.01	0.01	0.01
Welder DC-9805003894	0.08	0.01	0.02	0.01	0.01	0.01	0.01
Welder LDC-8330AC	0.08	0.01	0.02	0.01	0.01	0.01	0.01
Helicopters	1.82	3.90	0.23	5.27	0.25	0.25	0.25
Surface Coating - Maintenance	0.00	4.00	0.00	0.00	0.00	0.00	0.00
Abrasive Blasting	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total (TPY):</b>	<b>2.19</b>	<b>7.93</b>	<b>0.31</b>	<b>5.31</b>	<b>0.28</b>	<b>0.28</b>	<b>0.28</b>

**Table 5.8-1 Equipment Hazardous Air Pollutant Factors**

**Table 5.8-1  
Part 70 Reeval 9102-R8  
Equipment Hazardous Air Pollutant Factors**

Equipment Type	Description	Dev No	References	Units	Metals										Organic Compounds												
					Arsenic 740432	Beryllium 744017	Cadmium 744043	Chromium 744073	Cobalt 744044	Lead 748921	Manganese 748955	Mercury 743976	Nickel 744003	Selenium 778242	Acetaldehyde 75070	Acrolein 10028	Benzene 71432	1,3-Butadiene 106990	Chlorobenzene 108907	Ethyl Benzene 100414	Formaldehyde 50000	n-Hexane 110543	Hydrochloric Acid 7647010	PAHs 1150/1151	Toluene 108883	2,2,4-Trimethylpentane 540841	Xylenes 133027
Stationary Internal Combustion Engines (Table A)	Pedestal Crane East	005350	References D & E	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.7833	0.0339	0.1863	0.2174	0.0002	0.0109	1.7261	0.0289	0.1863	0.0559	0.1054	--	0.0424
	Emergency Production Generator	005371	References D & E	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.7833	0.0339	0.1863	0.2174	0.0002	0.0109	1.7261	0.0289	0.1863	0.0559	0.1054	--	0.0424
	Firewater Pump	005372	References D & E	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.7833	0.0339	0.1863	0.2174	0.0002	0.0109	1.7261	0.0289	0.1863	0.0559	0.1054	--	0.0424
	Firewater Pump	007143	References D & E	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.7833	0.0339	0.1863	0.2174	0.0002	0.0109	1.7261	0.0289	0.1863	0.0559	0.1054	--	0.0424
	Emergency Drilling Engine	005370	References D & E	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.7833	0.0339	0.1863	0.2174	0.0002	0.0109	1.7261	0.0289	0.1863	0.0559	0.1054	--	0.0424
B - Side Cement Pumping Skid	112508	References D & E	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.7833	0.0339	0.1863	0.2174	0.0002	0.0109	1.7261	0.0289	0.1863	0.0559	0.1054	--	0.0424	
	C - Side Cement Pumping Skid	112507	References D & E	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.7833	0.0339	0.1863	0.2174	0.0002	0.0109	1.7261	0.0289	0.1863	0.0559	0.1054	--	0.0424
	Cuttings Rejection Pump	386482	References D & E	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.7833	0.0339	0.1863	0.2174	0.0002	0.0109	1.7261	0.0289	0.1863	0.0559	0.1054	--	0.0424
Combustion - External	Central Process Heater	005353	References B & C <sup>1</sup>	lb/MMcf	0.0002	1.2E-05	0.0011	0.0014	8.4E-05	0.0005	0.00038	0.00026	0.0021	2.4E-05	0.00028	0.0027	0.0058	--	--	0.0069	0.0123	0.0046	--	0.0004	0.0265	--	0.0197
	Central Process Heater (PR)	005353	References A, B & C <sup>1,5</sup>	lb/1000 gal	1.79E-05	1.08E-06	9.87E-05	0.000126	7.54E-06	4.49E-05	3.41E-05	2.33E-05	0.000188	2.15E-06	0.00028	0.00024	0.00051	--	--	0.00061	0.00109	0.00041	--	0.00004	0.00235	--	0.00175
Flare Relief System (Table J)	Purge and Pilot	102382	References B & C <sup>1</sup>	lb/MMcf	0.0002	1.2E-05	0.0011	0.0014	8.4E-05	0.0005	0.00038	0.00026	0.0021	2.4E-05	0.043	0.010	0.159	--	--	1.444	1.169	0.029	--	0.014	0.058	--	0.029
	Planned - Continuous	102383	References B & C <sup>1</sup>	lb/MMcf	0.0002	1.2E-05	0.0011	0.0014	8.4E-05	0.0005	0.00038	0.00026	0.0021	2.4E-05	0.043	0.010	0.159	--	--	1.444	1.169	0.029	--	0.014	0.058	--	0.029
	Planned - Other	102384	References B & C <sup>1</sup>	lb/MMcf	0.0002	1.2E-05	0.0011	0.0014	8.4E-05	0.0005	0.00038	0.00026	0.0021	2.4E-05	0.043	0.010	0.159	--	--	1.444	1.169	0.029	--	0.014	0.058	--	0.029
	Unplanned	102385	References B & C <sup>1</sup>	lb/MMcf	0.0002	1.2E-05	0.0011	0.0014	8.4E-05	0.0005	0.00038	0.00026	0.0021	2.4E-05	0.043	0.010	0.159	--	--	1.444	1.169	0.029	--	0.014	0.058	--	0.029
Fugitive Components - Gas	Accessible	102536	Reference G <sup>1</sup>	lb/lb-ROC	--	--	--	--	--	--	--	--	--	--	--	0.0030	--	--	--	--	0.1576	--	--	--	--	0.1394	--
	Valve/Connection Category B	102527	Reference G <sup>1</sup>	lb/lb-ROC	--	--	--	--	--	--	--	--	--	--	--	0.0030	--	--	--	--	0.1576	--	--	--	--	0.1394	--
	Valve/Connection Category C	104948	Reference G <sup>1</sup>	lb/lb-ROC	--	--	--	--	--	--	--	--	--	--	--	0.0030	--	--	--	--	0.1576	--	--	--	--	0.1394	--
	Valve/Connection Category F	104943	Reference G <sup>1</sup>	lb/lb-ROC	--	--	--	--	--	--	--	--	--	--	--	0.0030	--	--	--	--	0.1576	--	--	--	--	0.1394	--
	Unsafe	102529	Reference G <sup>1</sup>	lb/lb-ROC	--	--	--	--	--	--	--	--	--	--	--	0.0030	--	--	--	--	0.1576	--	--	--	--	0.1394	--
Exempt	102536	Reference G <sup>1</sup>	lb/lb-ROC	--	--	--	--	--	--	--	--	--	--	--	0.0030	--	--	--	--	0.1576	--	--	--	--	0.1394	--	
Fugitive Components - Oil	Accessible	102516	Reference H <sup>1</sup>	lb/lb-ROC	--	--	--	--	--	--	--	--	--	--	--	0.0030	--	--	--	--	0.3000	--	--	--	--	0.2636	--
	Valve/Connection Category B	102520	Reference H <sup>1</sup>	lb/lb-ROC	--	--	--	--	--	--	--	--	--	--	--	0.0030	--	--	--	--	0.3000	--	--	--	--	0.2636	--
	Valve/Connection Category F	102517	Reference H <sup>1</sup>	lb/lb-ROC	--	--	--	--	--	--	--	--	--	--	--	0.0030	--	--	--	--	0.3000	--	--	--	--	0.2636	--
	Unsafe	104950	Reference H <sup>1</sup>	lb/lb-ROC	--	--	--	--	--	--	--	--	--	--	--	0.0030	--	--	--	--	0.3000	--	--	--	--	0.2636	--
	Pump Seal	102518	Reference H <sup>1</sup>	lb/lb-ROC	--	--	--	--	--	--	--	--	--	--	--	0.0030	--	--	--	--	0.3000	--	--	--	--	0.2636	--
Supply Boat	Main Engine - DPV	005357	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
	Main Engine - Spot Charter	104959	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
	Generator Engine - DPV	005358	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
	Bow Thruster - DPV	005359	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
	Winch - DPV	104962	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
	Emergency Response (Main)	386556	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
Emergency Response (Aux)	386556	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390	
Survival Capsules	Survival Capsule #1	103956	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
	Survival Capsule #2	103957	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
	Survival Capsule #3	103958	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
Crew Boat	Main Engine - DPV	005361	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
	Main Engine - DPV Broadbill	107900	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
	Main Engine - Spot Charter	104960	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
	Auxiliary Engines - DPV	005362	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
	Auxiliary Engines - DPV Broadbill	107901	References D & F <sup>2</sup>	lb/1000 gal	0.0016	--	0.0015	0.0006	--	0.0083	0.0031	0.0020	0.0039	0.0022	0.105	0.0127	0.128	0.00536	0.0002	0.0109	0.162	0.0289	0.1863	0.0230	0.0560	--	0.0390
Pigging Equipment (Table F)	Emulsion Pig Launcher	102539	Reference H <sup>1</sup>	lb/lb-ROC	--	--	--	--	--	--	--	--	--	--	--	0.0030	--	--	--	--	0.3						

References:

- A - South Coast Air Quality Management District. December 2016. *Reporting Procedures for AB2588 Facilities for Reporting their Quadrennial Air Toxics Emissions Inventory*. Table B-3: Default EF for LPG, Butane, or Propane Combustion - External Combustion Equipment. <http://www.aqmd.gov/docs/default-source/planning/annual-emission-reporting/supplemental-instructions-for-ab2588-facilities.pdf>
- B - Ventura County Air Pollution Control District. May 2001. *AB 2588 Combustion Emission Factors*. Natural Gas Fired External Combustion Equipment Table <http://www.vcapcd.org/pubs/Engineering/AirToxics/combem.pdf>
- C - USEPA. July 1998. *AP-42 Chapter 1.4*. Table 1.4-4: Emission Factors for Metals from Natural Gas Combustion. <https://www3.epa.gov/ttn/chieffap42/ch01/final/c01s04.pdf>
- D - Ventura County Air Pollution Control District. May 2001. *AB 2588 Combustion Emission Factors*. Diesel Combustion Factors Table - internal combustion. <http://www.vcapcd.org/pubs/Engineering/AirToxics/combem.pdf>
- E - South Coast Air Quality Management District. December 2016. *Reporting Procedures for AB2588 Facilities for Reporting their Quadrennial Air Toxics Emissions Inventory*. Table B-2: Default EF for Diesel/Distillate Oil Fuel Combustion. <http://www.aqmd.gov/docs/default-source/planning/annual-emission-reporting/supplemental-instructions-for-ab2588-facilities.pdf>
- F - USEPA. October 1996. *AP-42 Chapter 3.3*. Table 3.3-2: Speciated Organic Compound Emission Factors for Uncontrolled Diesel Engines. <https://www3.epa.gov/ttn/chieffap42/ch03/final/c03s03.pdf>
- G - California Air Resources Board. August 1991. *Identification of Volatile Organic Compound Species Profiles*. Profile #757: Oil & Gas Production Fugitives – Gas Service. <https://www.ourair.org/wp-content/uploads/CARB-VOC-Species-Profiles.pdf>
- H - California Air Resources Board. August 1991. *Identification of Volatile Organic Compound Species Profiles*. Profile #756: Oil & Gas Production Fugitives – Liquid Service. <https://www.ourair.org/wp-content/uploads/CARB-VOC-Species-Profiles.pdf>
- I - California Air Resources Board. August 1991. *Identification of Volatile Organic Compound Species Profiles*. Profile #532: Oil & Gas Extraction – Well Heads & Cellars/Oil & Water Separators. <https://www.ourair.org/wp-content/uploads/CARB-VOC-Species-Profiles.pdf>
- J - APCD: 100 percent of the ROC emissions are assumed to be HAPs for the Chemical Storage Tote Tanks. HAP emissions were assigned to xylene, one of the chemicals delivered to the platform, as a conservative assumption.
- K - Santa Barbara County APCD: For HAP calculations, solvents are assumed to contain 5% benzene, 5% toluene and 5% xylenes.

Notes:

- 1 - The lead emission factor is from AP-42 Table 1.4-2: Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion.
  - 2 - Emission factors from USEPA's AP-42 were supplemented with emission factors from Ventura County Air Pollution Control District for pollutants not included in AP-42 Table 3.3-2.
  - 3 - Natural gas emission factors for metals (Reference 3: AP-42 Chapter 1.4) were converted to propane based on a HHV of 1,020 Btu/scf for natural gas and 91,500 Btu/gal for propane.
  - 4 - The emission factors, originally in units of lb/lb-TOC, were converted to lb/lb-ROC using an ROC/TOC fraction of 0.33 from Table 2 of the District's P&P 6100.061.
  - 5 - The emission factors, originally in units of lb/lb-TOC, were converted to lb/lb-ROC using an ROC/TOC fraction of 0.606 from Table 3.2.3 of the District's P&P 6100.060.
  - 6 - The emission factors, originally in units of lb/lb-TOC, were converted to lb/lb-ROC using an ROC/TOC fraction of 0.3 based on PTO 9102-R7
  - 7 - The weight fraction for iso-octane (2,2,4-Trimethylpentane) is based on the conservative assumption that all isomers of octane are iso-octane.
- All ROC to TOC ratios are based on a Off Shore Platform

**Table 5.8-2 Annual Hazardous Air Pollution Emissions (TPY)**

**Table 5.8-2  
Part 70 Reveal 9102-R8  
Annual Hazardous Air Pollution Emissions (TPY)**

Equipment Type	Description	Dev No	Units	Metals											Organic Compounds											
				Arsenic 74603	Beryllium 74404	Cadmium 74403	Chromium 74401	Cobalt 74405	Lead 74399	Manganese 74399	Mercury 74399	Nickel 74400	Selenium 77824	Acetaldehyde 75201	Acrolein 50703	Benzene 71432	1,3-Butadiene 10699	Chlorobenzene 10897	Ethyl Benzene 10014	Formaldehyde 5000	n-Hexane 11054	Hydrochloric Acid 76470	PAHs 1159/151	Toluene 10888	2,2,4-Trimethylpentane 50081	Xylenes 13307
Stationary Internal Combustion Engines (Table A)	Fixed Crane East	00530	TPY	7.46E-05	--	6.99E-05	2.80E-05	--	3.97E-04	1.49E-04	9.32E-05	1.82E-04	1.03E-04	3.65E-02	1.59E-03	8.68E-03	1.01E-02	9.32E-06	6.08E-04	8.05E-02	1.25E-03	8.68E-03	2.61E-03	4.91E-03	--	1.98E-03
	Emergency Production Generator	00531	TPY	1.02E-05	--	9.54E-06	3.81E-06	--	5.28E-05	1.97E-05	1.27E-05	2.48E-05	1.40E-05	4.99E-03	2.18E-04	1.19E-03	1.39E-03	1.27E-06	6.93E-05	1.10E-02	1.71E-04	1.18E-03	3.95E-04	6.70E-04	--	2.70E-04
	Firewater Pump	00532	TPY	3.03E-06	--	2.84E-06	1.14E-06	--	1.17E-05	5.87E-06	3.78E-06	7.38E-06	4.16E-06	1.48E-03	6.41E-05	3.52E-04	4.11E-04	3.78E-07	2.06E-05	3.27E-03	5.09E-05	3.52E-04	1.06E-04	1.90E-04	--	8.02E-05
	Firewater Pump	00714	TPY	3.97E-06	--	3.72E-06	1.49E-06	--	2.08E-05	7.70E-06	4.97E-06	9.68E-06	5.46E-06	1.95E-03	8.42E-05	4.63E-04	5.40E-04	4.97E-07	2.71E-05	4.29E-03	6.68E-05	4.63E-04	1.39E-04	2.62E-04	--	1.05E-04
	Emergency Drilling Engine	00533	TPY	2.21E-05	--	2.07E-05	8.28E-06	--	1.19E-04	4.29E-05	2.79E-05	5.39E-05	3.04E-05	1.08E-02	4.68E-04	2.57E-03	3.02E-03	2.76E-06	1.91E-04	2.39E-02	3.71E-04	2.97E-03	7.72E-04	1.46E-03	--	5.65E-04
B - Side Cement Pumping Skid	112508	TPY	1.92E-04	--	1.92E-04	7.19E-05	--	9.95E-04	3.72E-04	2.42E-04	4.68E-04	2.64E-04	9.93E-02	4.09E-03	2.23E-02	2.61E-02	2.40E-05	1.31E-03	2.07E-01	3.23E-03	2.23E-02	6.70E-03	1.26E-02	--	5.98E-03	
	112507	TPY	1.92E-04	--	1.80E-04	7.19E-05	--	9.95E-04	3.72E-04	2.42E-04	4.68E-04	2.64E-04	9.93E-02	4.09E-03	2.23E-02	2.61E-02	2.40E-05	1.31E-03	2.07E-01	3.23E-03	2.23E-02	6.70E-03	1.26E-02	--	5.98E-03	
Cuttings Reaeration Pump	386492	TPY	1.73E-04	--	1.64E-04	6.49E-05	--	8.98E-04	3.39E-04	2.19E-04	4.22E-04	2.39E-04	8.48E-02	3.67E-03	2.02E-02	2.35E-02	2.16E-05	1.19E-03	1.87E-01	2.91E-03	2.02E-02	6.05E-03	1.14E-02	--	4.93E-03	
Combustion - External	Central Process Heater	00533	TPY	2.27E-05	1.39E-06	1.25E-04	1.59E-04	9.53E-06	5.67E-05	4.31E-05	2.95E-05	2.39E-04	2.72E-06	3.52E-04	3.06E-04	6.99E-04	--	--	7.83E-04	1.40E-03	5.22E-04	--	4.54E-05	3.01E-03	--	2.24E-03
	Central Process Heater (PR)	00533	TPY	8.53E-07	5.12E-08	4.69E-06	5.97E-06	3.99E-07	2.13E-06	1.62E-06	1.11E-06	8.96E-06	1.02E-07	1.33E-05	1.14E-05	2.43E-05	--	--	2.90E-05	5.19E-05	1.95E-05	--	1.90E-06	1.12E-04	--	8.32E-05
Flare Relief System (Table J)	Purge and Pilot	102382	TPY	3.90E-07	2.34E-08	2.14E-06	2.73E-06	1.64E-07	9.75E-07	7.41E-07	5.07E-07	4.09E-06	4.98E-08	8.39E-05	1.95E-05	3.10E-04	--	--	2.81E-03	2.29E-03	5.65E-05	--	2.73E-05	1.13E-04	--	5.65E-05
	Planned - Continuous	102383	TPY	6.30E-07	3.19E-08	3.02E-06	3.72E-06	2.22E-07	1.33E-06	1.01E-06	6.91E-07	5.59E-06	6.39E-08	1.14E-04	2.66E-05	4.23E-04	--	--	3.94E-03	3.11E-03	7.71E-05	--	3.72E-05	1.54E-04	--	7.71E-05
	Planned - Other	102384	TPY	6.30E-07	3.79E-08	3.47E-06	4.41E-06	2.65E-07	1.58E-06	1.20E-06	7.39E-07	6.62E-06	7.66E-08	1.25E-04	3.15E-05	5.01E-04	--	--	4.55E-03	3.66E-03	5.14E-05	--	4.41E-05	1.93E-04	--	2.98E-07
	Unplanned	102385	TPY	3.40E-08	2.04E-07	1.87E-05	2.39E-05	1.43E-06	8.50E-06	6.48E-06	4.42E-06	3.57E-05	4.08E-07	7.31E-04	1.70E-04	2.70E-03	--	--	2.45E-02	1.99E-02	4.93E-04	--	2.39E-04	9.86E-04	--	8.39E-06
Fugitive Components - Gas	Accessable	102518	TPY	--	--	--	--	--	--	--	--	--	--	--	6.34E-02	--	--	--	--	3.26E+00	--	--	--	--	--	2.87E+00
	Valve/Connection	102517	TPY	--	--	--	--	--	--	--	--	--	--	--	3.72E-02	--	--	--	--	--	1.02E+00	--	--	--	--	1.71E+00
	Valve/Connection	104848	TPY	--	--	--	--	--	--	--	--	--	--	--	2.99E-03	--	--	--	--	--	1.35E-01	--	--	--	--	1.19E-01
	Category C	104843	TPY	--	--	--	--	--	--	--	--	--	--	--	1.30E-02	--	--	--	--	--	6.74E-01	--	--	--	--	5.96E-01
	Category F	105219	TPY	--	--	--	--	--	--	--	--	--	--	--	3.30E-03	--	--	--	--	--	1.71E-01	--	--	--	--	1.52E-01
	Unsafe	105218	TPY	--	--	--	--	--	--	--	--	--	--	--	0.00E+00	--	--	--	--	--	0.00E+00	--	--	--	--	0.00E+00
Fugitive Components - Oil	Accessable	102518	TPY	--	--	--	--	--	--	--	--	--	--	--	5.73E-03	--	--	--	--	--	5.87E-01	--	--	--	--	4.99E-01
	Valve/Connection	102520	TPY	--	--	--	--	--	--	--	--	--	--	--	2.13E-05	--	--	--	--	--	1.85E-03	--	--	--	--	1.85E-03
	Category B	102517	TPY	--	--	--	--	--	--	--	--	--	--	--	2.99E-04	--	--	--	--	--	2.99E-02	--	--	--	--	2.99E-02
	Category F	104850	TPY	--	--	--	--	--	--	--	--	--	--	--	1.22E-05	--	--	--	--	--	1.02E-02	--	--	--	--	1.02E-02
	Unsafe	102518	TPY	--	--	--	--	--	--	--	--	--	--	--	0.00E+00	--	--	--	--	--	0.00E+00	--	--	--	--	0.00E+00
	Exempt	102525	TPY	--	--	--	--	--	--	--	--	--	--	--	0.00E+00	--	--	--	--	--	0.00E+00	--	--	--	--	0.00E+00
Supply Boat	Main Engine - DPV	00537	TPY	1.93E-04	--	1.81E-04	7.24E-05	--	1.00E-03	3.74E-04	2.41E-04	4.73E-04	2.65E-04	1.27E-02	1.53E-03	1.54E-02	6.46E-04	2.41E-05	1.31E-03	1.95E-02	3.25E-03	2.25E-02	2.79E-03	6.76E-03	--	4.71E-03
	Main Engine - Spot Chatter	104959	TPY	1.93E-05	--	1.81E-05	7.24E-06	--	1.00E-04	3.74E-05	2.41E-05	2.65E-05	1.27E-03	1.53E-04	1.54E-03	6.46E-05	2.41E-06	1.31E-04	1.95E-03	3.25E-04	2.25E-03	2.79E-04	6.76E-04	--	4.71E-04	
	Generator Engine - DPV	00538	TPY	1.88E-05	--	1.78E-05	7.05E-06	--	9.78E-05	3.64E-05	2.35E-05	4.58E-05	2.69E-05	1.24E-03	1.49E-04	1.50E-03	6.30E-05	2.35E-06	1.30E-04	1.99E-03	2.71E-04	6.59E-04	1.99E-03	2.71E-04	6.59E-04	4.69E-04
	Bow Thruster - DPV	00539	TPY	6.41E-06	--	6.01E-06	2.40E-06	--	3.33E-05	1.24E-05	8.02E-06	1.58E-05	8.93E-06	4.21E-04	5.09E-05	5.12E-04	2.11E-05	8.02E-07	4.37E-05	6.46E-04	1.08E-04	7.47E-04	9.23E-05	2.25E-04	--	1.56E-04
	Winch - DPV	104862	TPY	5.29E-06	--	4.92E-06	1.97E-06	--	2.72E-05	1.02E-05	6.98E-06	1.28E-05	7.21E-06	3.44E-04	4.15E-05	4.19E-04	1.76E-05	6.94E-07	3.57E-05	5.30E-04	8.82E-05	6.11E-04	7.55E-05	1.84E-04	--	1.28E-04
	Emergency Response (Main)	386556	TPY	5.97E-04	--	5.69E-04	2.24E-04	--	3.10E-05	1.16E-05	7.48E-05	1.46E-05	8.31E-06	3.92E-04	4.73E-05	4.77E-04	2.00E-05	7.46E-07	4.07E-05	6.02E-04	1.02E-04	8.69E-04	8.69E-05	2.09E-04	--	1.46E-04
	Emergency Response (Aux)	386556	TPY	1.41E-07	--	1.32E-07	5.29E-08	--	1.73E-07	2.73E-07	1.73E-07	3.44E-07	1.94E-07	9.26E-06	1.12E-06	1.13E-05	4.72E-07	1.76E-08	9.60E-07	1.42E-05	2.37E-06	1.64E-05	2.02E-06	4.94E-06	--	3.44E-06
	Survival Capsules	Survival Capsule #1	103956	TPY	1.94E-07	--	1.82E-07	7.26E-08	--	1.00E-06	3.73E-07	2.42E-07	4.72E-07	2.66E-07	1.27E-05	1.53E-06	1.55E-05	6.48E-07	2.42E-08	1.32E-06	1.99E-05	3.25E-06	2.25E-05	2.79E-06	6.78E-06	--
Survival Capsule #2		103957	TPY	1.94E-07	--	1.82E-07	7.26E-08	--	1.00E-06	3.73E-07	2.42E-07	4.72E-07	2.66E-07	1.27E-05	1.53E-06	1.55E-05	6.48E-07	2.42E-08	1.32E-06	1.99E-05	3.25E-06	2.25E-05	2.79E-06	6.78E-06	--	4.72E-06
Survival Capsule #3		103958	TPY	1.06E-07	--	9.90E-08	3.96E-08	--	5.48E-07	2.05E-07	1.32E-07	2.57E-07	1.45E-07	6.94E-06	8.39E-07	8.44E-06	3.54E-07	1.32E-08	7.19E-07	1.07E-05	1.78E-06	1.23E-05	1.52E-06	3.70E-06	--	2.98E-06
Dred Boat	Main Engine - DPV	00561	TPY	1.14E-04	--	1.07E-04	4.27E-05	--	5.91E-04	2.21E-04	1.42E-04	2.79E-04	1.57E-04	7.49E-03	9.03E-04	9.11E-03	3.92E-04	1.42E-05	7.77E-04	1.15E-02	1.92E-03	1.33E-02	1.64E-03	3.99E-03	--	2.79E-03
	Main Engine - DPV Broadbill	107900	TPY	7.62E-05	--	7.12E-05	2.81E-05	--	3.94E-04	1.47E-04	9.95E-05	1.85E-04	1.04E-04	4.99E-03	6.02E-04	6.07E-03	2.54E-04	9.93E-06	5.19E-04	7.66E-03	1.29E-03	8.85E-03	1.09E-03	2.69E-03	--	1.85E-03
	Main Engine - Spot Chatter	104860	TPY	1.90E-05	--	1.78E-05	7.12E-06	--	9.89E-05	3.69E-05	2.37E-05	4.53E-05	2.61E-05	1.22E-03	1.37E-05	1.52E-03	6.39E-05	2.37E-06	1.29E-04	1.92E-04	2.71E-04	6.65E-04	1.99E-04	2.71E-04	6.65E-04	4.94E-04
	Auxiliary Engines - DPV	104862	TPY	1.94E-05	--	1.82E-05	7.26E-06	--	1.00E-04	3.73E-05	2.42E-05															

**Table 5.8 -3 Stationary Source Hazardous Air Pollutant Emissions (TPY)**

**SJU Project  
Stationary Source Hazardous Air Pollutant Emissions (TPY)**

Facility	Permit #	Antimony	Arsenic	Beryllium	Cadmium	Chromium	Cobalt	Lead	Manganese	Mercury	Nickel	Selenium	Acetaldehyde	Acrolein	Benzene	1,3-Butadiene	Chlorobenzene	Ethyl Benzene	Formaldehyde	n-Hexane	Hydrochloric Acid	Methanol	PAHs	Propylene	Toluene	2,2,4-Trimethylp entane	Xylenes
08018 - Platform Harmony	PTO 9101-R8	0.00E+00	1.20E-03	1.71E-06	1.25E-03	6.38E-04	1.20E-05	6.13E-03	2.32E-03	1.50E-03	3.15E-03	1.61E-03	3.65E-01	1.88E-02	3.46E-01	9.37E-02	1.46E-04	4.45E-02	8.11E-01	6.46E+00	1.36E-01	0.00E+00	3.11E-02	0.00E+00	1.69E-01	5.68E+00	2.33E-01
08019 - Platform Heritage	PTO 9102-R8	0.00E+00	1.19E-03	1.71E-06	1.25E-03	6.35E-04	1.20E-05	6.10E-03	2.30E-03	1.49E-03	3.13E-03	1.60E-03	3.62E-01	1.87E-02	3.51E-01	9.28E-02	1.45E-04	4.45E-02	8.04E-01	6.82E+00	1.35E-01	0.00E+00	3.09E-02	0.00E+00	1.68E-01	6.00E+00	2.32E-01
08009 - Platform Hondo	PTO 9100-R8	0.00E+00	9.30E-04	3.70E-07	9.00E-04	3.89E-04	2.59E-06	4.81E-03	1.80E-03	1.16E-03	2.32E-03	1.27E-03	3.35E-01	1.62E-02	4.61E-01	8.85E-02	1.15E-04	5.08E-02	7.60E-01	8.57E+00	1.08E-01	0.00E+00	2.70E-02	0.00E+00	2.54E-01	8.04E+00	3.25E-01
01482 - Las Flores Canyon	PTO 5651-R8	0.00E+00	3.09E-04	1.46E-05	1.40E-03	1.73E-03	1.02E-04	9.49E-04	5.90E-04	3.99E-04	2.72E-03	1.19E-04	1.70E+02	2.72E+01	5.13E+01	1.83E+00	8.18E-06	1.37E+02	3.01E+03	6.60E+00	7.62E-03	0.00E+00	9.36E+00	1.23E+02	5.53E+02	5.39E+00	2.72E+02
03170 - POPCO	PTO 8092-R11	0.00E+00	3.86E-04	2.30E-05	2.11E-03	2.69E-03	1.61E-04	9.68E-04	7.33E-04	5.01E-04	4.04E-03	4.81E-05	1.01E-02	5.84E-03	2.26E-01	1.97E-04	1.81E-07	1.36E-01	1.24E-01	9.69E+00	1.68E-04	7.40E-03	1.99E-03	0.00E+00	6.70E-02	8.56E+00	4.87E-02
<b>Total Stationary Source - By Pollutant</b>		<b>0.00E+00</b>	<b>4.01E-03</b>	<b>4.15E-05</b>	<b>6.91E-03</b>	<b>6.08E-03</b>	<b>2.90E-04</b>	<b>1.89E-02</b>	<b>7.75E-03</b>	<b>5.05E-03</b>	<b>1.53E-02</b>	<b>4.65E-03</b>	<b>1.71E+02</b>	<b>2.72E+01</b>	<b>5.27E+01</b>	<b>2.10E+00</b>	<b>4.15E-04</b>	<b>1.38E+02</b>	<b>3.01E+03</b>	<b>3.81E+01</b>	<b>3.87E-01</b>	<b>7.40E-03</b>	<b>9.46E+00</b>	<b>1.23E+02</b>	<b>5.54E+02</b>	<b>3.37E+01</b>	<b>2.73E+02</b>

Notes:  
 1. These are estimates only, and are not intended to represent emission limits.  
 2. Based on CAAA, Section 112 (n) (4) stipulations, the HAP emissions listed above can not be aggregated at the source for any purpose, including determination of HAP major source status for MACT applicability.



**Table 5.9 SYU Expansion Project Entire Source Emissions**

**Entire Source Emissions**

<b>Facility</b>	<b>NOx</b>	<b>ROC</b>	<b>Reference</b>
Las Flores Canyon	98.56	68.83	PTO 5651 (Table 5.2)
Las Flores Canyon - Phase III Oil/Water	0.00	2.09	PTO 5651 (Appendix 10.9)
Las Flores Canyon - Exempt	9.40	6.64	PTO 5651 (Table 5.4)
Platform Harmony (a)	43.25	46.57	PTO 9101 (Table 5.2)
Platform Harmony - Exempt	25.84	10.20	PTO 9101 (Table 5.4)
Platform Heritage (b)	43.25	45.93	PTO 9102 (Table 5.2)
Platform Heritage - Exempt	25.84	10.20	PTO 9102 (Table 5.4)
Crew Boats (OCS) (c)	62.68	7.53	PTO 9101 or 9102 (Table 5.2)
Supply Boats (OCS) (c)	61.37	3.24	PTO 9101 or 9102 (Table 5.2)
<b>TOTAL 370.19 201.23</b>			

Notes:

- (a) Platform Harmony emissions do not include crew, supply and emergency response boats.
- (b) Platform Heritage emissions do not include crew, supply and emergency response boats.
- (c) Crew and supply boat emissions based on PTE for one of the platforms.  
Supply boats include ROC and NOx from the Emergency Response boats.

## **6.0 Air Quality Impact Analysis**

### **6.1. Modeling**

Air quality modeling was not required for the issuance of this OCS operating permit. Modeling was performed for the onshore portion of the SYU Expansion Project in 1987. The air impacts from the operation of Platform Heritage were addressed in ATC 5651 (11/87) and the results are summarized in Part 70/District PTO 5651.

### **6.2. Increments**

An increment analysis was not required for the issuance of this OCS operating permit. An increment analysis was performed for the onshore portion of the SYU Expansion Project in 1987. The air impacts from the operation of Platform Heritage were addressed in ATC 5651 (11/87) and the results are summarized in Part 70/District PTO 5651.

### **6.3. Monitoring**

Air quality monitoring was not required for the issuance of this OCS operating permit.

### **6.4. Health Risk Assessment**

A Health Risk Assessment was not required for the issuance of this OCS operating permit.

## 7.0 CAP Consistency, Offset Requirements and ERCs

### 7.1. General

The stationary source is located in an ozone nonattainment area. Santa Barbara County has not attained the state ozone ambient air quality standards. The County also does not meet the state PM<sub>10</sub> ambient air quality standards. Therefore, emissions from all emission units at the stationary source and its constituent facilities must be consistent with the provisions of the USEPA and State approved Clean Air Plans (CAP) and must not interfere with progress toward attainment of federal and state ambient air quality standards. Under District regulations, any modifications at the source that result in an emissions increase of any nonattainment pollutant exceeding 25 lbs/day must apply BACT (NAR). Increases above offset thresholds will trigger offsets at the source or elsewhere so that there is a net air quality benefit for Santa Barbara County. These offset threshold levels are 240 lbs/day for all attainment pollutants and precursors (except carbon monoxide and PM<sub>2.5</sub>) and 25 tons/year for all non-attainment pollutants and precursors (except carbon monoxide and PM<sub>2.5</sub>).

### 7.2. Clean Air Plan

The 2007 Clean Air Plan, adopted by the District Board on August 16, 2007, addressed both federal and state requirements, serving as the maintenance plan for the federal eight-hour ozone standard and as the state triennial update required by the Health and Safety Code to demonstrate how the District will expedite attainment of the state eight-hour ozone standard. The plan was developed for Santa Barbara County as required by both the 1998 California Clean Air Act and the 1990 Federal Clean Air Act Amendments.

In December 2019, the District Board adopted the 2019 Ozone Plan. The 2019 Plan provides a three-year update to the 2016 Ozone Plan, (which was later revised in August 2017), and is the ninth triennial update to the initial State Air Quality Attainment Plan. As Santa Barbara County was designated nonattainment-transitional for the state eight-hour ozone standard at the time of the 2019 Ozone Plan publication, the county reached attainment status on July 1, 2020. The 2019 Ozone Plan demonstrates how the District plans to attain and keep that standard. The 2019 Ozone Plan therefore satisfies all state triennial planning requirements.

### 7.3. Offset Requirements

- 7.3.1 NEI Offsets: Under previous District rules, the permittee was required to provide offsets for the project's operational net emission increase for NO<sub>x</sub>, ROC, PM, PM<sub>10</sub> and SO<sub>2</sub>. In order to demonstrate a net air quality benefit, the offsets were adjusted to account for the distance between the project source and the offset source.
- 7.3.2 ESE Offsets: In order to make the finding of net air quality benefit and to assure reasonable further progress toward attainment of the federal ozone standard and to comply with FDP Condition XII-3.b, the permittee is required by the FDP to offset the SYU Expansion Project's Entire Source Emissions (ESE) for NO<sub>x</sub> and ROC by reducing emissions at existing sources by an equal amount. Specifically, the permittee is required to offset the NO<sub>x</sub> and ROC entire source emissions from the SYU Project at a ratio of 1 to 1. This requirement is necessary for the District to make the determination that the entire project provides a net air quality benefit to Santa Barbara County, does not impede reasonable further progress toward attainment of the ozone standards and is consistent with the District-approved AQAP. The permittee has met and continues to meet this mitigation requirement by providing emissions reductions for all SYU Expansion Project NO<sub>x</sub> and ROC emissions, as detailed in the original ATC, and providing

Emission Reduction Credits for all subsequent projects via the District's NSR rules. Compliance with the District's NSR rules assures all future projects meet this FDP requirement.

- 7.3.3 PTE Offsets: District Rule 802, *New Source Review*, was updated on August 25, 2016, to go from a net emissions increase (NEI) to a potential to emit (PTE) calculation methodology for determining offsets. The emissions from the Santa Ynez Unit (SYU) Project stationary source triggers offset requirements for NO<sub>x</sub>, ROC, SO<sub>x</sub>, PM and PM<sub>10</sub> based on the stationary source PTE for those pollutants. All projects permitted after August 25, 2016 must be offset pursuant to the requirements of Rule 802.3.

The specific offset requirements for Platform Harmony are detailed in Tables 7.1 and 7.2.

#### **7.4 Emission Reduction Credits**

- 7.4.1 ATC 11132 Mod-02: The permittee generated 0.459 TPY (0.115 TPQ) of ROC ERCs in order to offset emission increases from the IP/LP and HP gas expansion projects on Platform Heritage. These ERCs were created by implementation of an enhanced fugitive hydrocarbon inspection and maintenance program. The requirements for the emission reduction credits (enhanced I&M) authorized under DOI No. 0039 are identified in this permit.
- 7.4.2 DOI 042-01: The permittee generated 1.843 tpq NO<sub>x</sub> and 0.072 tpq PM/PM<sub>10</sub> due to the replacement of the diesel main propulsion and auxiliary engines on the dedicated crew boat for the SYU project, the *M/V Broadbill*. This "repowering" of the vessel involved the installation of two new Tier II Detroit Diesel Series 60 propulsion engines (each rated at 600 bhp), and two new Tier II Northern Lights Model M40C2 auxiliary engines (each rated at 60 bhp). The new engines replaced existing uncontrolled engines.

Per DOI No. 0042-02, the *M/V Broadbill* was replaced by the *M/V Ryan T*. The *M/V Ryan T* is equipped with four Tier III John Deere PowerTech 6135AFM85 main propulsion engines (each rated at 575 bhp) and two Tier III Northern Lights Model M30CW3 auxiliary engines (each rated at 49 bhp). The District determined that the use of the *M/V Ryan T* instead of the *M/V Broadbill* maintained the validity of the Emission Reduction Credits associated with DOI 0042-01. The *M/V Broadbill* remains as the emissions basis for the DOI as listed in Table 5.1 – 5.4.

Per DOI No. 0042-03, the *M/V Ryan T* and *M/V Capt T Le* can be used as alternative crew vessels to the *M/V Broadbill*. The *M/V Capt T Le* has three (3) Tier III main propulsion engines and two (2) Tier III auxiliary engines. The three (3) main propulsion engines are Tier III John Deere PowerTech 6135SFM85 engines (each rated at 575 bhp). The two (2) auxiliary engines are Tier III Kohler 32EOZD engines (each rated at 42.9 bhp). The District determined that the use of the *M/V Ryan T* and *M/V Capt T Le* as alternative crew boats for the *M/V Broadbill* ensures validity of the Emission Reduction Credits associated with DOI 0042 - 01. The *M/V Broadbill* remains as the emissions basis for the DOI as listed in Table 5.1 – 5.4.

**Table 7.1 Offset Liability Table for Sable Offshore SYU Source**

**Table 7.1 - Offset Liability Table for Sable Offshore SYU Source**  
**Updated: March 23, 2018**

Item	Permit	Facility	Issue Date	ERC Returned?	Project	Offset Liability --- tons/year ---					ERC Source	Notes
						NO <sub>x</sub>	ROC	SO <sub>x</sub>	PM	PM <sub>10</sub>		
1	Prior Offset Liabilities	LFC	pre-8/2016	n/a	See LFC Archive Offset Tables	98.870	70.200	44.260	47.730	38.480	Various	(a)(b)
2	Prior Offset Liabilities	POPCO	pre-8/2016	n/a	See POPCO Archive Offset Tables	0.640	4.390	12.920	0.080	0.080	Various	(a)(c)
3	Prior Offset Liabilities	Hondo	pre-8/2016	n/a	See Hondo Archive Offset Tables	0.000	3.770	20.500	0.000	0.000	Various	(a)(c)
4	Prior Offset Liabilities	Harmony	pre-8/2016	n/a	See Harmony Archive Offset Tables	0.000	4.310	19.780	0.000	0.000	Various	(a)(c)
5	Prior Offset Liabilities	Heritage	pre-8/2016	n/a	See Heritage Archive Offset Tables	0.000	7.280	19.780	0.000	0.000	Various	(a)(c)
6	ATC 14978	LFC	03/08/17	No	Diesel fired prime air compressors.	0.016	0.008	0.000	0.000	0.000	ERC 427	(g)
<b>TOTALS (tpy) =</b>						<b>99.526</b>	<b>89.958</b>	<b>117.240</b>	<b>47.810</b>	<b>38.560</b>		

Notes

- (a) Pre-August 26, 2016 offset liabilities are summarized in Items (1) - (5). See facility Archive Offset Tables for details.
- (b) Pre-August 26, 2016 offset liabilities for LFC from Table 5.10 of PTO 5651-R5.
- (c) Pre-August 26, 2016 offset liabilities for POPCO, Hondo, Harmony and Heritage from Tables 7.1, 7.2 and 7.3 of PTO 8092-R8, PTO 9100-R5, PTO 9101-R5 and PTO 9102-R5, respectively.
- (d) See Table 7.2 for ERCs required to mitigate the offset liability. ERC Source denotes the ERC Certificate # used by the ATC permit.
- (e) Permits with zero emission increases not shown in this table.
- (f) ERCs used after August 26, 2016 may be returned to the Source Register. This line item reflects such a return. It is entered as a negative entry to balance this ledger. Original entry is not revised.
- (g) Used as back up pneumatic air supply during temporary preservation period.

**Table 7.2 Emission Reduction Credits Table for Sable Offshore SYU Source**

**Table 7.2 - Emission Reduction Credits Table for Sable Offshore SYU Source**  
**Updated: March 23, 2018**

Item	Permit	Facility	Surrender Date	ERC Returned?	Emission Reduction Credits ---- tons/year ----					Offset Ratio	ERC Source	NOTES
					NO <sub>x</sub>	ROC	SO <sub>x</sub>	PM	PM <sub>10</sub>			
1	Prior Offset Liabilities	LFC	pre-8/2016	n/a	247.000	159.960	62.250	58.050	46.440	varied	Various	(a)(b)
2	Prior Offset Liabilities	POPCO	pre-8/2016	n/a	3.810	22.120	23.850	0.500	0.500	varied	Various	(a)(c)
3	Prior Offset Liabilities	Hondo	pre-8/2016	n/a	0.000	10.730	21.730	0.000	0.000	varied	Various	(a)(c)
4	Prior Offset Liabilities	Harmony	pre-8/2016	n/a	0.000	10.550	20.680	0.000	0.000	varied	Various	(a)(c)
5	Prior Offset Liabilities	Heritage	pre-8/2016	n/a	0.000	15.140	20.680	0.000	0.000	varied	Various	(a)(c)
6	ATC 14978	LFC	03/08/17	No	0.018	0.009	0.000	0.000	0.000	1.1	ERC 427	--

TOTALS (tpy) =	250.828	218.509	149.190	58.550	46.940
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Notes

- (a) Items (1) - (5) reflect all NSR ERCs used for the five Sable Offshore (previously ExxonMobil) SYU stationary source facilities prior to August 26, 2016. See the August 26, 2016 Archive Offset Tables for details.
- (b) Pre-August 26, 2016 ERC requirements from Tables 7.1 - 7.4 of PTO 5651-R5, PTO 8092-R8, PTO 9100-R5, PTO 9101-R5 and PTO 9102-R5. PM10 ERC value not documented in prior permits. Assumed to be 80% of PM.
- (c) **Brown text** cells require data entry. Do not enter data in **Black text** cells

ATC 14978 is valid only during the period that the Las Flores Canyon facility is idle due to the failure of the AAPL pipeline. This permit shall expire immediately upon resumption of operation of any of the emission elements subject to DOI 098-01

**Table 7.3 ESE Project Operation Emissions and Offsets**

Entire Source Emissions

ESE EMISSIONS FROM PROJECT	NO <sub>x</sub> <sup>(a)</sup>		ROC
		TPY	TPY
Santa Ynez Expansion Project <sup>(b)</sup>		370.19	201.23
De Minimis Transfer			3.803
De Minimis Transfer - 2009			0.560
De Minimis Transfer - ATC 13039			0.056
Cogen Power Plant M&T - ATC 13545			0.174
De Minimis Transfer - ATC/PTO 13487			0.048
<b>Total</b>		<b>370.19</b>	<b>205.87</b>

EMISSION REDUCTION SOURCES (ESE)	NO <sub>x</sub> <sup>(a)</sup>		ROC
1. OS&T Shutdown	308.00		147.00
2. Hondo Turbine Reductions	14.00		--
3. Hondo and OS&T Supply Boat Reductions <sup>(c)</sup>	0.00		2.00
4. Hondo Crew Boat Reductions	56.00		7.00
5. Carpinteria Gas Plant			
Cooper/Ingersoll Rand Compressors			
- Exxon's Portion (IR)	29.00		--
- ARCO's Portion (Cooper)	96.00		--
6. Utility Displacement Credit	16.00		1.00
7. Platform Hilda Fugitive I&M	--		35.00
8. Platform Hope Cooper Compressor (partial)	32		--
9. Platform Heidi Fugitive I&M	--		13.00
10. Platform Hazel Fugitive I&M	--		31.00
11. Carpinteria Gas Plant Fugitive I&M	--		49.00
12. Shell Molino Waukesha/White Compressors	20.00		--
13. ARCO Seep Containment Project (partial)	--		15.00
14. ERC Certificates: Mcghan Shutdowns			2.436
15. ERC Certificates: Bioentrics Shutdowns			2.628
16. ERC Certificate: Grefco Shutdown			2.560
17. ERC Certificate: LFC Fugitive I&M			0.068
18. ERC Certificate 0235-0811 M/V Broadbill Repower <sup>(f)</sup>			0.209
19. ERC Certificate 0235-0811 M/V Broadbill Repower <sup>(g)</sup>			0.0576
<b>Total ESE Offsets:</b>	<b>571.00</b>		<b>307.96</b>
Disposition of Excess ESE Offsets: <sup>(d)</sup>	108.00		146.93
Excess/Shortfall ESE ERC Offsets:	92.81		-48.16
Excess ESE Offsets remaining due to IP	0.00		0.00
Trade of Nox for ROC at ratio 1.927:			
<b>New Excess ESE Offsets: <sup>(e)</sup></b>	<b>0.00</b>		<b>3.318</b>

Notes:

- <sup>(a)</sup> NO<sub>x</sub> as NO<sub>2</sub>
- <sup>(b)</sup> See Section 5 for a detailed listing of SYU Project emissions due to operation.
- <sup>(c)</sup> Reductions of NO<sub>x</sub> from the supply boats did not occur.
- <sup>(d)</sup> Excess ESE Offsets at time of the initial Part 70 Permit to Operate/APCD Permit to Operate (2000) were applied to several projects as described in Table 7.6 of the Part 70 PTO 5651/PTO 5651 issued in
- <sup>(e)</sup> Amount of ESE ERCs provided exceed ESE liability. Excess ESE ERC distribution per Table 7.6. New or modified projects require ERCs from the Source Register per Regulation VIII.
- <sup>(f)</sup> NO<sub>x</sub> ERCs used as ROC offsets at a one to one ratio.
- <sup>(g)</sup> ERCs generated from repowering of the M/V Broadbill.

**Table 7.4 Disposition of Excess NOx and ROC ESE ERCs**

Disposition of Excess NOx and ROC ESE ERCs

**Entire Source Emissions**

Disposition Sources	Nox <sup>(a)</sup> TPY	ROC TPY
1. Offsets provided to the Hondo De Minimis Transfer (ATC/PTO 10991)	--	1.177
2. Offsets provided to the POPCO De Minimis Transfer (ATC/PTO 11001)	--	0.143
<b>Total Offset:</b>	<b>0.00</b>	<b>1.320</b>
Excess/Shortfall ESE ERC Offsets:	0.00	2.009

**Notes:**

<sup>(a)</sup> NO<sub>x</sub> as NO<sub>2</sub>



**Table 7.5 SYU Project Offset Sources**

Source #	Source Description	Location	Contract Duration	Emission Control Measure	Uncontrolled Emission Rate		Controlled Emission Rate		Control Efficiency		Available Offset Credit		Portion Utilized by Exxon	
					(tons/year)		(tons/year)		%		(tons/year)		(tons/year)	
					NOx	ROC	NOx	ROC	NOx	ROC	NOx	ROC	NOx	ROC
1	Ingersoll Rand Gas Fired I.C. Engine Compressor #1 -440 HP	CGP	A TC Issuance through Project Life	Pre-Stratified Charge	23	--	4	--	82.6	--	19	--	9	--
2	Ingersoll Rand Gas Fired I.C. Engine Compressor #3 -440 HP	CGP	A TC Issuance through Project Life	Pre-Stratified Charge	51	--	13	--	74.5	--	38	--	20	--
3	Cooper-Bessemer Gas Fired I.C. Engine Compressor 1350 bhp	CGP	10/1/1991 through Project Life	Clean Burn Combustion Modification (Low NOx Heads)	199	--	6	--	97	--	193	--	96	--
4	Cooper-Bessemer Gas Fired I.C. Engine Compressor 1450 HP	Platform Hope	OS&T Decommissioning through Project Life	Clean Burn Combustion Modification (Low NOx Heads)	253	--	24	--	90.5	--	229	--	32	--
5	White-Superior Gas Fired I.C. Engine Compressor 320 bhp	SMGP	7/1/1989 through Project Life	Non-selective Catalytic Converter	9	--	1	--	90	--	8	--	5	--
6	Waukeshia Gas Fired I.C. Engine Compressor 880 bhp	SMGP	7/1/1989 through Project Life	Non-selective Catalytic Converter	24	--	2	--	90	--	22	--	15	--
7	Fugitive I&M Programs	SWP Hazel	A TC Issuance through Project Life	I&M Program	79	--	17	--	78	--	62	--		31
		SWP Heidi			86	--	19	--	78	--	67	--	13	
		SWP Hilda			90	--	20	--	78	--	70	--	35	
		CGP			237	--	53	--	78	--	184	--	49	
8	ARCO Seep Containment <sup>A</sup>	Offshore Ellwood	A TC Issuance through Project Life	Capture Device	--	NA	--	0	--	100	--	2,464	--	15
9	Hondo Crew Boat <sup>B</sup>	Ellwood	1/1/1988 through Project Life	Ignition Timing Retard/Reduced Trips	76	11	20	4	NA	NA	56	7	56	7
10	OS&T <sup>C</sup>	Offshore E1 Capitan State Park	OS&T Decommissioning through Project Life	Shutdown	308	147	0	0	NA	NA	308	147	308	147
11	Hondo Turbines <sup>C</sup>	Offshore E1 Capitan State Park	A TC Issuance through Project Life	Electrification	14	--	0	--	100	--	14	--	14	--
12	Hondo and OS&T <sup>D</sup> Supply Boats	Port Hueneeme	1/1/1988 through Project Life	n/a	6	--	4	--	NA	NA	2	--		2

<sup>A</sup> The 15 tons is the portion committed to the operational phase. The available offset credit is dependent upon the quarterly amount of hydrocarbons captured.

<sup>B</sup> Crew boats are required to meet 8.4 g/hp-hr and Exxon has committed to reducing boat trips to 2 per day. The uncontrolled emission rate was estimated from three years (1984-1986) of fuel use data.

<sup>C</sup> The uncontrolled emission rate was estimated from three years (1984-1986) of fuel use data.

<sup>D</sup> The original permit assumed that the supply boat engines were uncontrolled for NOx, however that was not the case.

## **8.0 Lead Agency Permit Consistency**

A Final Development Plan for the Santa Ynez Unit/ Las Flores Canyon project was approved by the Santa Barbara Planning Commission on September 15, 1987. This Plan included permit conditions XII-3, 5, 8, 11 and 17 which required the permittee to fully mitigate adverse air quality impacts of the project that would affect the county. In part, these conditions required the following measures: full mitigation of all NO<sub>x</sub> and ROC construction and operation emissions associated with the SYU project (including OCS emission sources); installation of Ambient Air Monitoring and Continuous Emission Monitoring Stations, and submittal of an air quality related Emergency Episode Plan. These requirements are included as part of ATC 5651 issued on November 19, 1987 and all subsequent permits that supersede that permit.

The United States Department of Interior's Mineral Management Service approved the *Development and Production Plan* for Platform Heritage on September 20, 1985.

### **8.1. Lead Agency/CEQA**

The District is the lead agency for this project. Pursuant to Section 15061(b)(3) of the California Environmental Quality Act (CEQA) Guidelines, the proposed modifications authorized under this permit are exempt from CEQA because the project does not have the potential for causing a significant effect on the environment. Further, no cross-media impacts are projected.

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## 9.0 Permit Conditions

This section lists the applicable permit conditions for Platform Heritage. 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. Section D lists non-federally enforceable (i.e., District only) permit conditions. 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 Platform Heritage. 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 the permittee shall be considered as acceptance of all terms, conditions, and limits of this permit. [*Re: PTO 9102*]
- 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.* [*Re: PTO 9102*]
- A.3 **Defense of Permit.** The permittee agrees, as a condition of the issuance and use of this PTO, to defend at its sole expense any action brought against the District because of issuance of this permit. The permittee shall reimburse the District for any and all costs including, but not limited to, court costs and attorney's fees which the District may be required by a court to pay as a result of such action. The District may, at its sole discretion, participate in the defense of any such action, but such participation shall not relieve the permittee of its obligation under this condition. The District shall bear its own expenses for its participation in the action. [*Re: PTO 9102*]
- 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 permit, 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 the permittee as required by Rule 210. [*Re: PTO 9102, 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, the permittee 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. [*Re: PTO 9102*]
- 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. [*Re: PTO 9102*]

- 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. [*Re: PTO 9102*]
- A.8 **Consistency with State and Local Permits.** Nothing in this permit shall relax any air pollution control requirement imposed on the Santa Ynez Unit Project by:
- (a) The County of Santa Barbara in Final Development Plan Permit 87-DP-32cz and any subsequent modifications;
  - (b) The Santa Barbara County Air Pollution Control District in Authority to Construct 5651, Permit to Operate 5651, and any subsequent modifications to either permit; and
  - (c) The California Coastal Commission in the consistency determination for the Project with the California Coastal Act. [*Re: PTO 9102*]
- A.9 **Compliance with Department of Interior Permits.** The permittee shall comply with all air quality control requirements imposed by the Department of the Interior in the Development and Production Plan approved for Platform Heritage on September 20, 1985 and any subsequent modifications. Such requirements shall be enforceable by the District. [*Re: PTO 9102*]
- A.10 **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:
    - (i) Compliance with the permit, or
    - (ii) 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.11 **Emergency Provisions.** *Revoked.*

A.12 **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.13 **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.14 **Severability.** In the event that any condition herein is determined to be invalid, all other conditions shall remain in force. [Ref: Rule 1303]

A.15 **Permit Life.** The Part 70 permit shall become invalid three years from the date of issuance unless a timely and complete renewal application is submitted to the District. Any operation of the source to which this Part 70 permit is issued beyond the expiration date of this Part 70 permit and without a valid Part 70 operating permit (or a complete Part 70 permit renewal application) shall be a violation of the CAAA, § 502(a) and 503(d) and of the District rules.

- (a) The permittee shall apply for renewal of the Part 70 permit no later than 6 months before the date of the permit expiration. Upon submittal of a timely and complete renewal application, the Part 70 permit shall remain in effect until the Control Officer issues or denies the renewal application. [Re: District Rule 1304.D.1]

A.16 **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.17 **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.

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

- A.18 **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 1<sup>st</sup> and March 1<sup>st</sup>, 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.19 **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.20 **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.21 **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 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.22 **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. These rules apply to the equipment and operations at Platform Heritage as they currently exist. Compliance with these requirements is discussed in Section 3.4.2. 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*]

**B.2 Visible Emissions (Rule 302).** The permittee 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.

For those sources listed in Condition 9.C.25 (*Visible Emissions*), the permittee shall be in compliance with the requirements of this Rule in accordance with the monitoring and compliance recordkeeping procedures in Condition 9.C.25 (*Visible Emissions*). [*Re: District Rule 302*]

**B.3 PM Concentration - South Zone (Rule 305).** The permittee 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.4 Specific Contaminants (Rule 309).** The permittee shall not discharge into the atmosphere from any single source sulfur compounds, carbon monoxide and combustion contaminants in excess of the applicable standards listed in Sections A, E and G of Rule 309. [*Re: District Rule 309*].

**B.5 Sulfur Content of Fuels (Rule 311).** The permittee shall not burn fuels with a sulfur content in excess of 0.5% (by weight) for liquid fuels and 239 ppmvd or 15 gr/100 scf (calculated as H<sub>2</sub>S) for gaseous fuel. Compliance with this condition shall be based on daily measurements of the fuel gas using Draeger tubes, 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*]

**B.6 Organic Solvents (Rule 317).** The permittee shall comply with the emission standards listed in Rule 317.B. Compliance with this condition shall be based on the permittee's compliance with Condition C.8 (*Solvent Usage*) of this permit. [*Re: District Rule 317*]

- B.7 **Vacuum Producing Devices or Systems – Southern Zone (Rule 318).** The permittee shall not discharge into the atmosphere more than 3 pounds of organic materials in any one hour from any vacuum producing devices or systems, including hot wells and accumulators, unless said discharge has been reduced by at least 90 percent. [*Re: District Rule 318*]
- B.8 **Solvent Cleaning Operations (Rule 321).** The permittee shall comply with the requirements listed in Sections D, G, I, P and Q of Rule 321. Compliance with this condition shall be based on the permittee's compliance with Condition C.8 (*Solvent Usage*) of this permit as well as District inspections. [*Re: District Rule 321*]
- B.9 **Metal Surface Coating Thinner and Reducer (Rule 322).** The use of photochemically reactive solvents as thinners or reducers in metal surface coatings is prohibited. Compliance with this condition shall be based on the permittee's compliance with Condition C.8 (*Solvent Usage*) of this permit and facility inspections. [*Re: District Rule 322*]
- B.10 **Architectural Coatings (Rule 323.1):** The permittee shall comply with the rule requirements for any architectural coating that is supplied, sold, offered for sale, or manufactured for use within the District.
- B.11 **Disposal and Evaporation of Solvents (Rule 324).** The permittee shall not dispose through atmospheric evaporation of more than one and a half gallons of any photochemically reactive solvent per day. Compliance with this condition shall be based on the permittee's compliance with Condition C.8 (*Solvent Usage*) of this permit and facility inspections. [*Re: District Rule 324*]
- B.12 **Continuous Emissions Monitoring (Rule 328).** The permittee shall comply with the requirements of Section C, F, G, H and I of Rule 328 for the fuel gas hydrogen sulfide analyzer. Compliance shall be based on the monitoring, recordkeeping and reporting requirements of this permit as well as on-site inspections. [*Re: District Rule 328*]
- B.13 **Adhesives and Sealants (Rule 353).** The permittee shall not use adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, or any other primers, unless the permittee complies with the following:
- (a) Such materials used are purchased or supplied by the manufacturer or suppliers in containers of 16 fluid ounces or less; or alternately
  - (b) When the permittee uses such materials from containers larger than 16 fluid ounces and the materials are not exempt by Rule 353.B.1, the total reactive organic compound emissions from the use of such material shall not exceed 200 pounds per year unless the substances used and the operational methods comply with Sections D, E, F, G, and H of Rule 353. Compliance shall be demonstrated by recordkeeping in accordance with Section B.2 and/or Section O of Rule 353. [*Re: District Rule 353*]
- B.14 **Oil and Natural Gas Production MACT.** The permittee submitted HAP calculations that show each of these facilities qualifies an area source (not a major source), and thus are not subject to the MACT. This is based on the definitions of "facility" and "major source" in the MACT. The data shows that each platform has less than 10 TPY combined HAPs. [*Re: 40 CFR 63, Subpart HH*]

B.15 **Reciprocating Internal Combustion Engine NESHAP.** The permittee shall comply with the requirements of the RICE NESHAP by the dates specified in the regulation. Prior to making any physical or operational changes to the engines subject to this regulation, the permittee shall obtain an Authority to Construct from the District. [Re: 40 CFR 63, Subpart ZZZZ]

### 9.C Requirements and Equipment Specific Conditions

Federally-enforceable conditions, including emissions and operations limits, monitoring, recordkeeping and reporting are included in this section for each specific group of equipment as well as other non-generic requirements.

C.1 **Internal Combustion Engines.** The following equipment are included in this emissions unit category:

Device Name	ExxonMobil ID	District Device No
<b>Stationary Internal Combustion Engines (Table A)</b>		
Pedestal Crane East	ZZZ-507	005350
Emergency Production Generator	ZAN-515	005371
Firewater Pump	PBE-357	005372
Firewater Pump	PBE-367	007143
Emergency Drilling Engine	ZAN-515	005370
B - Side Cement Pumping Skid		112508
C - Side Cement Pumping Skid		112507
Cuttings Reinjection Pump		386559

- a. Emission Limits: Mass emissions from the devices listed above shall not exceed the limits listed in Tables 5.3 and 5.4. Compliance with this condition shall be based on the operational, monitoring, recordkeeping and reporting conditions in this permit. In addition, the following specific emission limits apply:
- (i) *Cuttings Reinjection Pump Engine* - Emissions from the cuttings reinjection pump engine shall not exceed any of the following: 260 ppmv at NO<sub>x</sub> 15% O<sub>2</sub>, 750 ppmv ROC at 15% O<sub>2</sub>, and 396 ppmv CO at 15% O<sub>2</sub>. Compliance shall be based on quarterly or more frequent portable analyzer inspections in accordance with District Rule 333.F and source testing as applicable per District Rule 333.I.8.
  - (ii) *East Pedestal Crane Engine* - Emissions from the Pedestal Crane Engine shall not exceed any of the following: 700 ppmv NO<sub>x</sub> at 15% O<sub>2</sub> and 750 ppmv ROC at 15% O<sub>2</sub>. The oxidation catalyst shall limit CO emissions in the exhaust to 49 ppmv at 15% O<sub>2</sub> at all times except during startup. Compliance shall be based on quarterly or more frequent portable analyzer inspections in accordance with District Rule 333.F and source testing as applicable per District Rule 333.I.8.
  - (iii) *Cement Skid Prime Engines* - Emissions from the B-Side Cement Pumping Skid Engine, and the C-Side Cement Pumping Skid Engine shall not exceed any of the following: 700 ppmv NO<sub>x</sub> at 15% O<sub>2</sub>, 750 ppmv ROC at 15% O<sub>2</sub>, and 4,500 ppmv CO at 15% O<sub>2</sub>. Compliance shall be based on quarterly or more frequent portable analyzer inspections in accordance with District Rule 333.F and source testing as applicable per District Rule 333.I.8.

- b. Operational Limits: The equipment permitted herein is subject to the following operational restrictions listed below. Emergency use operations, as defined in the ATCM<sup>6</sup>, have no operational hour limitations.
- (i) *Fuel Use Limits* – The permittee shall comply with the following fuel limits:
    - (1) The East Pedestal Crane engine shall not use more than: 537 gallons per day; 24,491 gallons per quarter; 97,962 gallons per year of diesel fuel.
    - (2) The B-Side Cement Pump shall not use more than 690 gallons per day; 62,990 gallons per quarter; 251,961 gallons per year of diesel fuel.
    - (3) The C-Side Cement Pump shall not use more than 690 gallons per day; 62,990 gallons per quarter; 251,961 gallons per year of diesel fuel.
    - (4) The Cuttings Reinjection Pump engine shall not use more than 588 gallons per day; 53,655 gallons per quarter; 214,620 gallons per year of diesel fuel.
  - (ii) The operator of the Cuttings Reinjection Pump Engine must operate and maintain the engine in a manner consistent with safety and good air pollution control practices for minimizing emissions.
  - (iii) The operator of the Cuttings Reinjection Pump Engine shall minimize the engine’s time at idle during startups to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
  - (iv) The operator of the East Pedestal Crane shall comply with the requirements listed in District Rule 333. In addition, pedestal crane engine shall:
    - (1) Be equipped with an oxidation catalyst that limits CO exhaust emissions as specified in condition C.1.(a).ii above at all times except during startups.
    - (2) Maintain the engine and oxidation catalyst in a manner consistent with the manufacturer specifications and in accordance with safety and good air pollution control practices to minimize emissions.
    - (3) Minimize the engine’s time at idle during startups to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
    - (4) Operate a closed crankcase ventilation system at all times.
  - (v) *Engine Identification* - Each IC engine shall be identified with a permanently-affixed plate, tag or marking, referencing either: (i) the IC engine’s make, model, serial number, rated BHP and corresponding RPM; or (ii) the operator’s unique tag number. The tag shall be made accessible and legible to facilitate District inspection of the IC engine.

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<sup>6</sup> As used in the permit, “ATCM” means Section 93115, Title 17, California Code of Regulations. Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines

- (vi) *Engine Maintenance - East Pedestal Crane (ID 005350)* - Existing non-emergency non-black start compression ignition reciprocating internal combustion engines (RICE) must comply with the following operating limits:
  - (1) Change the oil and filter every 1,000 hours of operation or annually, whichever comes first. Alternatively, the owner or operator may utilize an oil analysis program specified in 40 CFR 63 Subpart ZZZZ §63.6625(i). If all the requirements detailed in this section of the regulation are satisfied, the owner or operator shall not be required to change the oil. If any of the limits are exceeded the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later;
  - (2) Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first;
  - (3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first.
- (vii) *Engine Maintenance - Emergency Production Generator (ID 4958), Emergency Firewater Pump A (ID 4959), and Emergency Firewater Pump B (ID 4960)* - Existing emergency standby compression ignition reciprocating internal combustion engines (RICE) must comply with the applicable operating limits. The following operating requirements apply:
  - (1) Change the oil and filter every 500 hours of operation or annually, whichever comes first. Alternatively, the owner or operator may utilize an oil analysis program specified in 40 CFR 63 Subpart ZZZZ §63.6625(i). If all the requirements detailed in this section of the regulation are satisfied, the owner or operator shall not be required to change the oil. If any of the limits are exceeded the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later;
  - (2) Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first;
  - (3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first.
- (viii) *High Pressure Fuel Injectors* - If high pressure fuel injectors are used to comply with Rule 333 standards, then that injector type shall be used on the engine for the life of the engine except as noted below. The permittee may revert to the normal pressure fuel injectors if District-approved source testing shows that the Rule 333 standards are achieved.

- (ix) *Maintenance & Testing Use Limit* - The stationary emergency standby diesel-fueled CI engines subject to this permit (firewater pumps and emergency generator engines), shall limit maintenance and testing operations to no more than 200 hours per year.
- (x) *Fuel and Fuel Additive Requirements* - The permittee may only add CARB Diesel, or an alternative diesel fuel that meets the requirements of the ATCM Verification Procedure, or CARB Diesel fuel used with additives that meet the requirements of the ATCM Verification Procedure, or any combination of the above to each engine or any fuel tank directly attached to each engine.
- (xi) *Diesel IC Engines - Particulate Matter Emissions* - To ensure compliance with District Rules 205.A, 302, 304, 309 and the California Health and Safety Code Section 41701, the permittee shall implement manufacturer recommended operational and maintenance procedures to ensure that all project diesel-fired engines minimize particulate emissions. The permittee shall implement the District approved *Diesel Engine Particulate Matter (PM) Operation and Maintenance Plan* for the life of the project. This Plan details the manufacturer recommended maintenance and calibration schedules that the permittee will implement. Where manufacturer guidance is not available, the recommendations of comparable equipment manufacturers and good engineering judgment shall be utilized. All project diesel-fired engines, regardless of exemption status, shall be included in this Plan.
- (xii) *Temporary Engine Replacements - DICE ATCM*. Any reciprocating internal combustion engine subject to this permit and the stationary diesel ATCM may be replaced temporarily only if the requirements (1 – 7) listed herein are satisfied.
  - (1) The permitted engine is in need of routine repair or maintenance.
  - (2) The permitted engine that is undergoing routine repair or maintenance is returned to its original service within 180 days of installation of the temporary engine.
  - (3) The temporary replacement engine has the same or lower manufacturer rated horsepower and same or lower potential to emit of each pollutant as the permitted engine that is being temporarily replaced. At the written request of the permittee, the District may approve a replacement engine with a larger rated horsepower than the permitted engine if the proposed temporary engine has manufacturer guaranteed emissions (for a brand new engine) or source test data (for a previously used engine) less than or equal to the permitted engine.
  - (4) The temporary replacement engine shall comply with all rules and permit requirements that apply to the permitted engine that is undergoing routine repair or maintenance.
  - (5) For each permitted engine to be temporarily replaced, the permittee shall submit a completed *Temporary IC Engine Replacement Notification* form (Form ENF-94) within 14 days of the temporary engine being installed. This form shall be sent electronically to: [enr@sbcapcd.org](mailto:enr@sbcapcd.org).



- (6) Within 14 days upon return of the original permitted engine to service, the permittee shall submit a completed *Temporary IC Engine Replacement Report* form (Form ENF-95). This form shall be sent electronically to: [enr@sbcapcd.org](mailto:enr@sbcapcd.org).
  - (7) Any engine in temporary replacement service shall be immediately shut down if the District determines that the requirements of this condition have not been met. This condition does not apply to engines that have experienced a cracked block (unless under manufacturer's warranty), to engines for which replacement parts are no longer available, or new engine replacements {including "reconstructed" engines as defined in the ATCM}. Such engines are subject to the provisions of New Source Review and the new engine requirements of the ATCM.
- (xiii) *Permanent Engine Replacements.* Any E/S engine, firewater pump engine or engine used for an essential public service that breaks down and cannot be repaired may install a new replacement engine without first obtaining an ATC permit only if the requirements (1 – 6) listed herein are satisfied.
- (1) The permitted stationary diesel IC engine is an E/S engine, a firewater pump engine or an engine used for an essential public service (as defined by the District).
  - (2) The engine breaks down, cannot be repaired and needs to be replaced by a new engine.
  - (3) The facility provides "good cause" (in writing) for the immediate need to install a permanent replacement engine prior to the time period before an ATC permit can be obtained for a new engine. The new engine must comply with the requirements of the ATCM for new engines. If a new engine is not immediately available, a temporary engine may be used while the new replacement engine is being procured. During this time period, the temporary replacement engine must meet the same guidelines and procedures as defined in the permit condition above (*Temporary Engine Replacements - DICE ATCM*).
  - (4) An Authority to Construct application for the new permanent engine is submitted to the District within 15 days of the existing engine being replaced and the District permit for the new engine is obtained no later than 180 days from the date of engine replacement (these timelines include the use of a temporary engine).
  - (5) For each permitted engine to be permanently replaced pursuant to the condition, the permittee shall submit a completed *Permanent IC Engine Replacement Notification* form (Form ENF-96) within 14 days of either the permanent or temporary engine being installed. This form shall be sent electronically to: [enr@sbcapcd.org](mailto:enr@sbcapcd.org).
  - (6) Any engine installed (either temporarily or permanently) pursuant to this permit condition shall be immediately shut down if the District determines that the requirements of this condition have not been met.

- (xiv) *Notification of Non-Compliance.* Owners or operators who have determined that they are operating their stationary diesel-fueled engine(s) in violation of the requirements specified in the ATCM shall notify the District immediately upon detection of the violation and shall be subject to District enforcement action.
  - (xv) *Notification of Loss of Exemption.* Owners or operators of in-use stationary diesel-fueled CI engines, who are subject to an exemption specified in the ATCM from all or part of the requirements of the ATCM, shall notify the District immediately after they become aware that the exemption no longer applies and shall demonstrate compliance within 180 days after notifying the District.
- c. Monitoring: The following source testing and periodic monitoring conditions apply to the crane, cement pumping skid and cuttings reinjection pump engines:
- (i) *Fuel Meters* - The amount of fuel combusted in each engine shall be measured using permanently installed District-approved fuel meters dedicated to each engine. As an alternative to in-line fuel meters, the permittee may report individual engine hours of operation utilizing a District-approved elapsed time meter <sup>7</sup>. A monthly log shall be maintained that records the fuel usage (or hours of operation) of each engine.
  - (ii) *Inspection and Maintenance Plan (I&M Plan)* - The permittee shall implement inspections on each engine according to the District-approved *Engine Inspection and Maintenance Plan* consistent with the requirements of Rule 333.F. This Plan, and any subsequent District-approved revisions, is incorporated by reference as an enforceable part of this permit.
  - (iii) *Source Testing* - For each engine, the permittee shall perform source testing of air emissions and process parameters consistent with the requirements of the *Source Testing* condition of this permit and in accordance with the requirements of Rule 333.I. Source testing of the cuttings reinjection pump shall be performed if triggered by Rule 333.I.8. More frequent source testing may be required if the equipment does not comply with permitted limitations or if other compliance problems, as determined by the Air Pollution Control Officer, occur.
  - (iv) *Fuel Data* – The permittee shall maintain documentation of the sulfur content (as determined by District-approved ASTM methods) of each diesel fuel shipment as certified in the fuel suppliers billing vouchers.
  - (v) *Non-Resettable Hour Meter* - Each stationary engine subject to this permit shall have installed a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District has determined (in writing) that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator’s compliance history.

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<sup>7</sup> The hours of operation, along with the engine horsepower rating and BSFC data as listed in Table 5.1-1 of this permit, a fuel correction factor of 1.06, and a high heating value of 138,200 Btu/gal will be used to determine the number of gallons of fuel consumed per time period.

- d. Recordkeeping: The permittee shall keep the required logs, as applicable to this permit, which demonstrate compliance with emission limits, operation limits and monitoring requirements above. All logs shall be available to the District upon request. District Form ENF-92 (*Diesel-Fired Emergency Standby Engine Recordkeeping Form*) can be used for this requirement. Written information (logs) shall include:
- (i) East Pedestal Crane – The permittee shall maintain the following records, as appropriate:
    - (1) A copy of each notification and report that the owner and operator submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that the owner and operator submitted, according to the requirement in 40 CFR 63 Subpart ZZZZ §63.10(b)(2)(xiv).
    - (2) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) of the air pollution control and monitoring equipment. The records must include a brief description for each type of malfunction which occurred and if the malfunction caused or may have caused any applicable emission limitation to be exceeded. The record must also include a description of actions taken by an owner or operator during the malfunction of an affected source to minimize emissions in accordance with 40 CFR 63 Subpart ZZZZ §63.6605(b), including actions taken to correct a malfunction.
    - (3) Records of performance tests and performance evaluations as required in 40 CFR 63 Subpart ZZZZ §63.10(b)(2)(viii) and §63.6655(a)(3).
    - (4) Records of all required maintenance performed on the air pollution control and monitoring equipment.
    - (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63 Subpart ZZZZ §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
    - (6) The owner and operator must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the owner and operator operated and maintained the stationary RICE and after-treatment control device according to the maintenance plan.
  - (ii) Daily, quarterly and annual fuel usage in units of gallons for the East Pedestal Crane, the cement pumping skid, and the cuttings reinjection pump engine.
  - (iii) The hours of operation for the firewater pump, drill rig emergency power generator and the production emergency power generator (by ID number). The log shall detail the number of operating hours on each day the engine is operated and the total monthly and cumulative annual hours. The log shall specify the following:

- (1) emergency use hours of operation;
  - (2) maintenance and testing hours of operation;
  - (3) hours of operation for all uses other than those specified in items (1) and (2) above along with a description of what those hours were for.
  - (4) hours of operation to comply with the requirements of the NFPA for firewater pumps {if applicable}
- (iv) IC engine operations logs, including inspection results, consistent with the requirements of Rule 333.J.
  - (v) If an operator's tag number is used in lieu of an IC engine identification plate, documentation which references the operator's unique IC engine ID number to a list containing the make, model, serial number, rated maximum BHP and the corresponding RPM.
  - (vi) For each engine with timing retard, a District Form –10 (*IC Engine Timing Certification Form*) must be completed each time the engine is serviced.
  - (vii) For each engine subject to the RICE MACT the following records shall be kept:
    - (1) The date of each engine oil change, the number of hours of operation since the last oil change, and the date and results of each oil analysis.
    - (2) The date of each engine air filter inspection and the number of hours of operation since the last air filter inspection. Indicate if the air filter was replaced as a result of the inspection.
    - (3) The date of each engine's hose and belts inspection and the number of hours of operation since the last hose and belt inspection. Indicate if any hose or belt was replaced as a result of the inspection.
  - (viii) 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 is either CARB Diesel, or an alternative diesel fuel that meets the requirements of the Verification Procedure, or an alternative fuel, or CARB Diesel fuel used with additives that meet the requirements of the Verification Procedure, or any combination of the above (*Reference Stationary Diesel ATCM and Title 13, CCR, Sections 2281 and 2282*).
- e. Reporting: On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the District. The report must list all data required by the *Compliance Verification Reports* condition of this permit. [Re: *District Rules 202, 205.A, 302, 304, 309, 311, 333 and 1303, PTO 9102, ATC/PTO 10038, PTO 14009-01, 40 CFR 70.6, CCR Title 17, Section 93115*]

C.2 **Combustion Equipment – Central Process Heater.** The following equipment are included in this emissions unit category:

Device Type	District Device No
<b><i>Combustion - External</i></b>	
Central Process Heater	005353
Central Process Heater (PR)	005353

(a) Emission Limits: Mass emissions from the Central Process Heater listed above shall not exceed the limits listed in Tables 5.3 and 5.4. Compliance with this condition shall be based on the operational, monitoring, recordkeeping and reporting conditions in this permit. In addition, the following specific emission limits apply:

- (i) *NO<sub>x</sub> Emissions* - Controlled emissions of NO<sub>x</sub> from the Central Process Heater shall not exceed 30 ppmvd at 3 percent oxygen or 0.036 lb/MMBtu when fired on either natural gas or propane. Compliance shall be based on source testing.
- (ii) *CO Emissions* - Controlled emissions of CO from the Central Process Heater shall not exceed 400 ppmvd at 3 percent oxygen or 0.297 lb/MMBtu when fired on either natural gas or propane. Compliance shall be based on source testing.

(b) Operational Limits:

(i) *Fuel Use Limits* – The permittee shall comply with the following operating limits:

- (1) The Central Process Heater shall not use more than: 502,154 standard cubic feet per day; 45.822 million standard cubic feet per quarter; 183.286 million standard cubic feet per year of natural gas as fuel.
- (2) The Central Process Heater shall not use more than: 64,659 standard cubic feet per day; 0.862 million standard cubic feet per quarter; 3.448 million standard cubic feet per year of propane gas as fuel.

(ii) *Fuel Gas Sulfur Limit* - The sulfur content of fuel gas combusted in the Central Process Heater shall not exceed 30 ppmv total sulfur calculated as hydrogen sulfide at standard conditions. Compliance shall be based on in-line continuous monitoring. During amine system startups and shutdowns, the total sulfur content of the fuel shall be allowed to increase up to 239 ppmv as hydrogen sulfide at standard conditions. The permittee shall operate the amine based fuel gas sweetening system at all times when combusting fuel gas in the process heater when the fuel source is from a sour production well. The amine system need not operate if the fuel gas to be combusted in the process heater is obtained from a sweet production well containing less than 80 ppmv total sulfur as hydrogen sulfide at standard conditions.

- (iii) *Use of Propane as Fuel Gas* - Propane may be used as an auxiliary fuel gas to the Central Process Heater on a temporary basis only during times when the supply of produced gas is interrupted or when the gas sweetening system is being repaired. The propane shall meet Gas Processors Association specifications for propane (HD-5 grade) and shall have a total sulfur content no greater than 165 ppmv (10 gr/100 scf).
- (c) **Monitoring:** The equipment in this section are subject to all the monitoring requirements listed in District Rule 342.E, G and I. The test methods In Rule 342.H shall be used. In addition, the permittee shall:
- (i) *Fuel Meters* - The amount of fuel combusted in the Central Process Heater shall be measured using permanently installed District-approved in-line fuel meter. Alternative methods for determining propane usage may be proposed by the permittee for District review and approval.
  - (ii) *Source Testing* - On a biennial schedule, the permittee shall source test the Central Process Heater according to Condition C.12 (*Source Testing*). More frequent testing may be required, as determined by the District, if full operating loads have not been achieved.
  - (iii) *Propane Fuel Data* – The permittee shall maintain documentation of the sulfur content and higher heating value (as determined by District-approved ASTM methods) of each propane fuel shipment as certified in the fuel suppliers billing vouchers.
  - (iv) *Natural Gas Fuel Data* – The permittee shall monitor the sulfur content of the natural gas fuel using an in-line continuous hydrogen sulfide analyzer. This analyzer shall be operated consistent with the requirements of the District's CEM Protocol document (dated October 22, 1992 and subsequent updates), where applicable. The readings from this analyzer shall be adjusted upward to take into account the average non-hydrogen sulfide reduced sulfur compounds in the fuel gas (if any). The permittee shall implement the District-approved *Fuel Gas Sulfur Reporting Plan* for the life of the project. This Plan shall detail: the monitoring equipment and CEM protocol procedures, the adjustments to the hydrogen sulfide readings due to non-hydrogen sulfide reduced sulfur compounds and the reporting methods for compliance with the applicable limits. The permittee shall submit the lab analyses reports to the District.
  - (v) The permittee shall monitor all the parameters required by the *Platform Heritage Central Process Heater Monitoring Plan* approved August 12, 2015, or the most recent District-approved version of the Plan.
- (d) **Recordkeeping:** The equipment listed in this section are subject to all recordkeeping requirement listed in Rule 342.I. In addition, the permittee shall:
- (i) *Natural Gas Fuel Use* - Daily, quarterly and annual fuel use for the Central Process Heater in units of standard cubic feet.

- (ii) *Sulfur Content* - A monthly log of the total sulfur content of the natural gas and propane combusted as fuel gas.
- (iii) *Propane Fuel Gas Use* - Record in a log each usage of propane in a District-approved format and maintain documentation of the sulfur content of each fuel shipment as certified in the fuel suppliers billing vouchers.
- (iv) The permittee shall maintain records as required by the *Platform Heritage Central Heater Process Monitoring Plan* approved August 12, 2015, or the most recent District-approved version of the Plan.
- (e) **Reporting:** The equipment listed in this section are subject to all the reporting requirements listed in District Rule 342.J. On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the District. The report must list all data required by the *Compliance Verification Reports* condition of this permit. [Re: District Rules 311, 342 and 1303, PTO 9102, ATC/PTO 10038, 40 CFR 70.6]

C.3 **Combustion Equipment - Flare.** The following equipment are included in this emissions unit category:

Device Type	District Device No
<b><i>Flare Relief System (Table J)</i></b>	
Purge and Pilot	102382
Planned - Continuous	102383
Planned - Other	102384
Unplanned	102385

- (a) **Emission Limits:** Mass emissions from the flare relief system listed above shall not exceed the limits listed in Tables 5.3 and 5.4. Notwithstanding the above and consistent with District P&P 6100.004, the short-term emission limits for *Planned - Other* and *Unplanned - Other* flaring categories in Table 5.3 shall not be considered as enforceable limits. Continuous planned flaring emissions are assumed for the flare header based on one-half the minimum detection limit for the meter according to manufacturer minimum velocity detection limits (0.25 fps). Other than flare purge and pilot, this is the only continuous flaring allowed under this permit. Compliance with this condition shall be based on the operational, monitoring, recordkeeping and reporting conditions in this permit.
- (b) **Operational Limits:**
  - (i) *Flaring Volumes* - Flaring volumes from the purge and pilot, planned continuous, planned other and unplanned other events shall not exceed the following volumes:

Flare Category	Hourly (10 <sup>3</sup> scf)	Daily (10 <sup>3</sup> scf)	Quarterly (10 <sup>6</sup> scf)	Annual (10 <sup>6</sup> scf)
Purge/Pilot	0.445	10.68	0.974	3.898
Planned Continuous	0.607	14.568	1.329	5.317
Planned Other			1.575	6.3
Unplanned Other			8.5	34

- (ii) *Flare Purge/Pilot Fuel Gas Sulfur Limits* - The purge/pilot fuel gas combusted in the flare shall not exceed a total sulfur content of 30 ppmv. Compliance shall be based on the monitoring, recordkeeping and reporting requirements of this permit.
  - (iii) *Flare Planned Continuous Flaring Sulfur Limits* - The sulfur content of all gas burned as continuous flaring in the flare header shall not exceed 20,000 ppmv total sulfur. This limit shall be enforced on an average quarterly basis (i.e., the average of all sulfur content measurements during the quarter). Compliance shall be based on the monitoring, recordkeeping and reporting requirements of this permit.
  - (iv) *Rule 359 Technology Based Standards* – The permittee shall comply with the technology based standards of Rule 359.D.2. Compliance shall be based on monitoring and recordkeeping requirements of this permit as well as District inspections.
  - (v) *Flaring Modes* – The permittee shall operate the flare consistent with District P&P 6100.004 (*Planned and Unplanned Flaring Events*). If the permittee is unable to comply with the infrequent planned flaring limit of 4 events per year from the same processing unit or equipment type, then an ATC permit application shall be submitted to incorporate those emissions in the short-term (hourly and daily) emissions of Table 5.3.
  - (vi) *Rule 359 Planned Flaring Target Volume Limit* - Pursuant to Rule 359, the permittee shall not flare more than 66 million standard cubic feet per month during planned flaring events.
  - (vii) *Use of Propane as Fuel Gas* - Propane may be used as an auxiliary fuel gas to the flare purge/pilot on a temporary basis only during times when the supply of produced gas is interrupted or when the gas sweetening system is being repaired. The propane shall meet Gas Processors Association specifications for propane (HD-5 grade) and shall have a total sulfur content no greater than 165 ppmv (10 gr/100 scf).
- (c) **Monitoring:** The equipment in this section are subject to all monitoring requirements listed in District Rule 359.G. The test methods In Rule 359.E. shall be used. In addition, the permittee shall:
- (i) *Flare Volumes* - The volumes of gas flared during each planned event shall be monitored by use of District-approved flare header flow meters. Unplanned flaring shall be monitored on an aggregate basis and shall be the difference between the



total flare volume and the volume of gas flared during planned flaring events. The meters shall be calibrated and operated consistent with the permittee's District approved *Process Monitor Calibration and Maintenance Plan*. An event is defined as any flow recorded by the flare header flow meters that exceeds the event flow rate thresholds listed below where the duration is 60 seconds or greater. During an event, any subsequent flows recorded by the flare header flow meter within 5 minutes after the flow rate drops below the minimum detection level of the meter shall be considered as part of the event.

Flare Header	Event Flow Rate Threshold (scfh)	Meter Minimum Detection Level (scfh)
Flare (FE-134-2,-3)	1,503	1,503

- (1) All planned flaring not classified as an event pursuant to the above definition shall be aggregated as a single quarterly volume and recorded in the *Planned Other* flaring category. Notwithstanding the above definition of an event, continuous flaring is prohibited for the *Planned Other* and *Unplanned Other* flaring categories.
- (ii) *Purge/Pilot Gas* – The permittee shall continuously monitor the purge/pilot fuel gas using an H<sub>2</sub>S analyzer when using amine sweetened produced fuel gas. The permittee shall monitor the purge/pilot fuel gas using gas detector tubes (or District-approved equivalent) when using produced fuel gas from sweet formation wells. The readings from these gas detector tubes shall be adjusted upward to take into account the average non-hydrogen sulfide reduced sulfur compounds in the fuel gas (if any) consistent with the permittee's District approved *Fuel Gas Sulfur Reporting Plan*. The permittee shall record in a log the results of each gas detector tube reading using a District-approved format. The permittee shall also perform annual total sulfur content and HHV measurements of the fuel gas using ASTM or other District-approved methods. The permittee shall utilize District-approved sampling and analysis procedures.
- (iii) *Flaring Sulfur Content* - The hydrogen sulfide content of produced gas combusted during flaring events shall be measured on the schedule pursuant to the District-approved *Flare Gas Sulfur Reporting Plan* using District-approved ASTM methods. On an annual basis, the permittee shall also measure the non-hydrogen sulfide reduced sulfur compounds and these values shall be added to the hydrogen sulfide measurements to obtain the total sulfur content. The permittee shall perform additional testing of the sulfur content and hydrogen sulfide content, using approved test methods, as requested by the District.
  - (1) The permittee shall sample the flare header to determine the hydrogen sulfide content using sorbent tubes. To obtain the total sulfur content, the permittee shall add the prior year's non-hydrogen sulfide reduced sulfur compounds analysis result to the absorbent tube readings.
- (iv) *Pilot Flame Detection* – The permittee shall continuously monitor each pilot to ensure that a flame is present at each pilot at all times.

- (v) *Propane Fuel Data* – The permittee shall maintain documentation of the sulfur content and higher heating value (as determined by District-approved ASTM methods) of each propane fuel shipment as certified in the fuel suppliers billing vouchers.
- (d) Recordkeeping: The equipment listed in this section is subject to all recordkeeping requirements listed in Rule 359.H. In addition, the permittee shall:
  - (i) *Flare Event Logs* - All planned flaring events shall be recorded in a log. The log shall include: date; duration of flaring events (including start and stop times); quantity of gas flared; total sulfur content; hydrogen sulfide content; high heating value; reason for each planned flaring event, including the processing unit or equipment type involved; the total heat input (MMBtu) per event; and, the type of event (e.g., Planned - Continuous LP, Planned - Other). The volumes of gas combusted and resulting mass emissions of all criteria pollutants for each type of event shall also be summarized for a cumulative summary for each day, quarter and year.
  - (ii) The total volume of gas combusted and resulting in mass emissions of all criteria pollutants from unplanned flaring events shall be summarized for each quarter and year.
  - (iii) *Pilot/Purge Gas Volume* - The volume of pilot/purge fuel gas combusted in the flare shall be recorded on a daily, monthly, and annual basis.
  - (iv) *Infrequent Flaring Events* – The permittee shall track and log the number of planned infrequent flaring events (as defined by District P&P 6100.004) from each processing unit or equipment type in a manner approved by the District.
  - (v) *Propane Fuel Gas Use* - Record in a log or electronic file each usage of propane in a District-approved format and maintain documentation of the sulfur content of each fuel shipment as certified in the fuel suppliers billing vouchers.
- (e) Reporting: The equipment listed in this section are subject to all reporting requirements listed in District Rule 359.H. On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the District. The report must list all data required by the *Compliance Verification Reports* condition of this permit. [Re: *District Rules 359 and 1303, PTO 9102, ATC/PTO 11236, 40 CFR 70.6*]

C.4 **Fugitive Hydrocarbon Emissions Components.** The following equipment are included in this emissions unit category:

Device Type	Device Subtype	District Device No
<b><i>Fugitive Components - Gas</i></b>		
Valve/Connection	Accessible	102526
Valve/Connection	Category B	102527
Valve/Connection	Category C	104948
Valve/Connection	Category F	104943
Valve/Connection	Unsafe	102529
	Exempt	102536

Device Type	Device Subtype	District Device No
<b><i>Fugitive Components - Oil</i></b>		
Valve/Connection	Accessible	102516
Valve/Connection	Category B	102520
Valve/Connection	Category F	102517
Valve/Connection	Unsafe	104950
Pump Seal	Dual/Tandem	102518
	Exempt	102525

- (a) **Emission Limits:** Mass emissions from the gas/light liquid service (sub-total) and oil service (sub-total) components listed above shall not exceed the limits listed in Tables 5.3 and 5.4. Compliance with this condition shall be based on actual component-leakpath counts as documented through the monitoring, recordkeeping and reporting conditions in this permit.
- (b) **Operational Limits:** Operation of the equipment listed in this section shall conform to the requirements listed in District Rule 331.D and E. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit. In addition the permittee shall meet the following requirements:
- (i) **VRS Use** - The vapor recovery and gas collection (VR & GC) systems at Platform Heritage shall be in operation when equipment connected to these systems are in use. These systems include piping, valves, and flanges associated with the VR & GC systems. The VR & GC systems shall be maintained and operated to minimize the release of emissions from all systems, including pressure relief valves and gauge hatches.
  - (ii) **I&M Program** - The District-approved I&M Plan, *Fugitive Emissions Inspection and Maintenance Program for Platforms Heritage and Harmony* shall be implemented for the life of the project. The Plan, and any subsequent District approved revisions, is incorporated by reference as an enforceable part of this permit.
  - (iii) **Leakpath Count** - The total component-leakpath count listed in the permittee's most recent I&M component-leakpath inventory shall not exceed the component-leakpath sub-totals listed in Table 5.1 by more than five percent. This five percent range is to allow for minor differences due to component counting methods and does not constitute allowable emissions growth due to the addition of new equipment.
  - (iv) **Venting** - All routine venting of hydrocarbons shall be routed to either the main gas compressors, flare header, injection wells or other District-approved control device.
  - (v) **BACT** - The permittee shall apply BACT, as defined in Table 4.1 Table 4, to all component-leakpaths in hydrocarbon service for Gas Compressor Skid Unit CZZ-306, the Topsides Installation Project (ATC 9828), and the Amine Fuel Gas Treating System for the life of the project.

- (vi) *Rule 331 BACT* - The component-leakpaths in hydrocarbon service listed in Table 4.2 are subject to BACT requirements pursuant to Rule 331. BACT, as defined in Table 4.2, shall be implemented for the life of the project.
  - (vii) *Category B Requirements* - Component-leakpaths monitored quarterly at less than 500 ppmv shall achieve a mass emission control efficiency of 85 percent. Category B component-leakpaths are defined as component-leakpaths associated with closed vent systems (e.g., vapor recovery systems) for which screening values are maintained at or below 500 ppmv as methane, monitored per EPA Reference Method 21. Category B component-leakpaths also include components subject to enhanced fugitive inspection and maintenance programs for which screening values are also maintained at or below 500 ppmv as methane, monitored per EPA Reference Method 21. For Category B components, screening values above 500 ppmv shall trigger the Rule 331 repair process per the minor leak schedule.
  - (viii) *Category C Requirements* - Component-leakpaths monitored quarterly at less than 100 ppmv shall achieve a mass emission control efficiency of 87 percent. Category C component-leakpaths are defined as component-leakpaths subject to enhanced fugitive inspection and maintenance programs for which screening values are maintained at or below 100 ppmv as methane, monitored per EPA Reference Method 21. For Category C components, screening values above 100 ppmv shall trigger the Rule 331 repair process per the minor leak schedule.
  - (ix) *Category F Requirements* - Low emitting design component-leakpaths monitored quarterly at less than 100 ppmv shall achieve a mass emission control efficiency of 90 percent. Category F component-leakpaths are subject to BACT per Rule 331 for which screening values are maintained at or below 100 ppmv as methane, monitored per EPA Reference Method 21. For Category F components, screening values above 100 ppmv shall trigger the Rule 331 repair process per the minor leak schedule.
- (c) Monitoring: The equipment listed in this section are subject to all the monitoring requirements listed in District Rule 331.F. The test methods in Rule 331.H shall be used.
- (i) *ERCs for Platform Heritage Low/Intermediate Pressure and High Pressure Projects* – The permittee shall perform quarterly monitoring on a minimum of 118 standard (i.e., non-bellows seal and non-low emissions) valves and a minimum of 370 standard flanges/connections at 100 ppmv leak detection threshold. These monitoring requirements must be fulfilled in order to generate 0.115 tpy of ROC ERCs of the total required for projects permitted by ATC 11132 Mod-01. These components are listed in a separate table in the permittee’s District approved I&M Plan. The permittee shall replace any component on the list with a replacement if the component is no longer in hydrocarbon service. The District shall be notified, in writing, of all such replacements within ninety (90) days after the replacement. The notification shall include complete equipment description information equivalent to the table in the permittee’s District approved I&M Plan and the reason for the replacement. Subsequent I&M records and reports shall include the replacement component(s).

- (d) Recordkeeping: The equipment listed in this section are subject to all the recordkeeping requirements listed in District Rule 331.G. In addition, the permittee shall:
- (i) *I&M Log* – The permittee shall record in a log the following: a record of leaking components found (including name, location, type of component, date of leak detection, the ppmv or drop-per-minute reading, date of repair attempts, method of detection, date of re-inspection and ppmv or drop-per-minute reading following repair); a record of the total components inspected and the total number and percentage found leaking by component type; a record of leaks from critical components; a record of leaks from components that incur five repair actions within a continuous 12-month period; and, a record of component repair actions including dates of component re-inspections. For the purpose of this paragraph, a leaking component is any component which exceeds the applicable limit:
    - (1) greater than or equal to 1,000 ppmv for minor leaks under Rule 331 (includes Accessible/Inaccessible components and Category A components);
    - (2) greater than or equal to 100 ppmv for components subject to current BACT (includes Bellows, Category F and Category G)
    - (3) greater than 100 ppmv for components subject to enhanced fugitive inspection and maintenance programs (Category C and Category E)
    - (4) greater than or equal to 500 ppmv for components subject to enhanced fugitive inspection and maintenance programs (Category B and Category D)
- (e) Reporting: The equipment listed in this section are subject to all reporting requirements listed in District Rule 331.G. Within one calendar quarter whenever there is a change in the component list or diagrams, the permittee shall provide an updated fugitive hydrocarbon component inventory per Rule 331.I. On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the District. The report must list all data required by the *Compliance Verification Reports* condition of this permit. [Re: *District Rules 331 and 1303, ATC 9828, ATC 9634, PTO 9634, PTO 9102, ATC/PTO 10038, ATC 11132 Mod-02, 40 CFR 70.6*]

C.5 **Crew and Supply Boats.** The following equipment are included in this emissions category:

Device Type	District Device No	Device Type	District Device No
<b>Crew Boat</b>		<b>Supply Boat</b>	
Main Engine - DPV	005361	Main Engine - DPV	005357
Auxiliary Engine - DPV	005362	Generator Engine - DPV	005358
<b>M/V Broadbill</b>		Bow Thruster - DPV	005359
Main Engine - DPV	107900	Winch - DPV	104962
Auxiliary Engine - DPV	107901	<b>Emergency Response</b>	
<b>Survival Capsules</b>		Emergency Response (Main)	386556
Survival Capsule #1	103956	Emergency Response (Aux)	386556
Survival Capsule #2	103957		
Survival Capsule #3	103958		

- (a) Emission Limits: Mass emissions from the crew, supply and emergency response boats listed above shall not exceed the limits listed in Tables 5.3 and 5.4. Compliance with the quarterly and annual mass emission limits for the main engines on the Dedicated Project Vessel (DPV) and spot charter crew and supply boat main engines shall be based on the subtotal emission limits in Table 5.4. Compliance with the quarterly and annual mass emission limits for the auxiliary engines on the DPV (including the *M/V Broadbill* and any approved replacement vessels) crew boats shall be based on the subtotal emission limits in Table 5.4. Compliance with this condition shall be based on the operational, monitoring, recordkeeping and reporting conditions in this permit. In addition:
- (i) *NO<sub>x</sub> Emissions* - Except as provided below, controlled emissions of NO<sub>x</sub> from each diesel fired main engine in each DPV crew and supply boat shall not exceed 337 lb /1000 gallons (8.4 g/bhp-hr). Spot charter crew and supply boats shall not be required to comply with this controlled NO<sub>x</sub> emission rate. Controlled emissions of NO<sub>x</sub> from the Tier II diesel fired main propulsion engines on the *M/V Broadbill* crew boat (and main engines of the approved replacement vessel *M/V Ryan T* and *M/V Capt T Le*), shall not exceed 218.98 lb/kgal (5.46 g/bhp-hr). Controlled emissions of NO<sub>x</sub> from the Tier II diesel fired auxiliary engines on the *M/V Broadbill* crew boat (and auxiliary engines on the approved replacement vessel *M/V Ryan T* and *M/V Capt T Le*) shall not exceed 217.87 lb/kgal (5.44 g/bhp-hr). Compliance shall be based on annual source testing consistent with the requirements listed in this permit and DOI 0042 Mod - 02
  - (ii) *Crew, Supply and Emergency Response Boat Stationary Source Maximum Permitted Emissions* - To more accurately define the SYU Project Stationary Source's annual potential-to-emit (which is used to determine fees for Air Quality Plans (Rule 210.F)), crew boat, supply boat (including spot charters) and emergency response boat usage, in aggregate, associated with OCS Platforms Heritage and Harmony shall not exceed the annual emission limits shown in Table 5.2. These limits apply to the crew boats, supply boats and emergency response boats separately.

(b) Operational Limits: Operation of the equipment listed in this section shall not exceed the limits listed below. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit. The fuel use limits in items (i) – (iv) below apply to the crew and supply boats while operating within 25-miles of the SYU platforms. For compliance with the limits in (i) – (iv) below, all the fuel use within 25-miles of the SYU platforms shall be assigned according the District-approved *Boat Monitoring and Reporting Plan*.

- (i) *Crew Boat Main Engine Limits* - The combined DPV and spot charter crew boat main engines for Platform Heritage shall not use more than: 65,307 gallons per quarter; 261,227 gallons per year of diesel fuel.
  - (1) The DPV and spot charter crew boat main engines for platform Heritage shall each not use more than 3,916 gallons per day.
- (ii) *Crew Boat Auxiliary Engine Limits* - The crew boat auxiliary engines for Platform Heritage shall not use more than: 156 gallons per day; 10,087 gallons per quarter; 40,348 gallons per year of diesel fuel.
- (iii) *M/V Broadbill Crew Boat Operational Requirements* – The permittee shall use the *M/V Broadbill* (Main Engines DID # 107904 and Auxiliary Engines DID# 107905) or a combination of the *M/V Broadbill* and other equivalent crew boats for at least forty percent (40%) of all crew boat trips to the platforms each year. For any other crew boats to be considered equivalent to the *M/V Broadbill*, they must meet all of the following criteria:
  - (1) The total bhp rating of the main engines is the same or less than the bhp rating of the main engines on the *M/V Broadbill*.
  - (2) The total bhp rating of the auxiliary engines is the same or less than the bhp rating of the auxiliary engines on the *M/V Broadbill*.
  - (3) The NO<sub>x</sub>, ROC, CO, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emission factors of the main and auxiliary engines are the same or less than the emission factors of the main and auxiliary engines on the *M/V Broadbill*.

Compliance with this condition will be determined each calendar year based on total fuel usage from the *M/V Broadbill* and fuel usage from all DPV crew boats supporting the SYU platforms. For the purposes of this condition, the *M/V Ryan T* and *M/V Capt T Le*, which replaced the *M/V Broadbill* under DOI 42-02, are considered equivalent vessels.

- (iv) *Supply Boat Main Engine Limits* - The combined DPV and spot charter supply boat main engines for Platform Heritage shall not use more than: 66,350 gallons per quarter; 265,399 gallons per year of diesel fuel.
  - (1) The DPV and spot charter supply boat main engines for platform Heritage shall each not use more than 3,146 gallons per day
- (v) *Supply Boat Auxiliary Engine Limits* - The combined uncontrolled generator, bow thruster, and winch supply boat engines for Platform Heritage shall not use more than: 392 gallons per day; 9,521 gallons per quarter; 38,084 gallons per year of diesel fuel.

- (vi) *Emergency Response Boat Engine Limits* - The emergency response boat main and auxiliary engines fuel use for Platform Heritage shall not exceed 1,910 gallons per quarter or 7,641 gallons per year of diesel fuel.
- (vii) *Crew, Supply and Emergency Response Boat Stationary Source Operational Limits* - To more accurately define the *SYU Project* Stationary Source's annual potential-to-emit (which is used to determine fees for Air Quality Plans (Rule 210.F)), crew boat, supply boat (including spot charters) and emergency response boat usage, in aggregate, associated with OCS Platforms Heritage and Harmony shall not exceed the annual fuel use limits shown in items (i), (ii), (iii), (iv) and (v) above. These limits apply to the crew boat main engines, crew boat auxiliary engines, supply boat main engines, supply boat auxiliary engines and emergency response boat engines separately.
- (viii) *Spot-Charter Limits* - The number of allowable annual spot charter crew boat trips shall not exceed ten percent of the actual annual number of trips made by the DPV crew boats. The number of allowable annual spot charter supply boat trips shall not exceed ten percent of the actual annual number of trips made by DPV supply boats. Compliance shall be based on a comparison of the main engine fuel use for DPV and spot charter boats (i.e., the total main engine spot charter supply boat fuel use must be less than 10 percent of the total main engine DPV supply boat fuel use and the total main engine spot charter crew boat fuel use must be less than 10 percent of the total main engine DPV crew boat fuel use).
- (ix) Crew, supply and spot charter boats shall be for the activities specified in 2.2.3. Any boats for or in support of activities not specified in Section 2.2.3 will be considered as new projects, and the boat emissions associated with such projects will be considered in the project potential to emit. Supply boats shall not use the Ellwood pier for transfer of personnel in place of crew boats.
- (x) *Fuel and Fuel Additive Requirements* - The permittee may only add CARB Diesel, or an alternative diesel fuel that meets the requirements of the ATCM Verification Procedure, or CARB Diesel fuel used with additives that meet the requirements of the ATCM Verification Procedure, or any combination of the above to each engine or any fuel tank directly attached to each engine.
- (xi) *New/Replacement Boats* - With the exception of the *M/V Broadbill* and *M/V Ryan T* and *M/V Capt T Le* crew boats, the permittee may utilize any new/replacement project (DPV) boat without the need for a permit revision if that boat meets the following conditions:
  - (1) The main engines are of the same or less bhp rating; and
  - (2) The combined pounds per day potential to emit (PTE) of all generator and bow thruster engines is the same or less than the sum of the pounds per day PTE for these engines as determined from the corresponding Table 5.1-3 emission line items of this permit; and
  - (3) The NO<sub>x</sub>, ROC, CO, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emission factors are the same or less for the main and auxiliary engines. For the main engines, NO<sub>x</sub> emissions must meet the 337 lb/1000 gallons emission standard.



- (4) The above criteria also apply to spot charter boats, except for the NO<sub>x</sub> emission standard noted in (3) above. Any proposed new/replacement crew, supply or spot charter boat that does not meet the above requirements (1) - (3) shall first obtain a permit revision prior to operating the boat. The District may require manufacturer guarantees and emission source tests to verify this NO<sub>x</sub> emission standard.
  - (5) The permittee shall revise the *Boat Monitoring and Reporting Plan*, obtain District approval of such revisions and implement the revised Plan prior to bringing any new/replacement boat into service, except for the use of spot charters. If a new spot charter is brought into service then the permittee shall revise and resubmit the boat plan within thirty (30) calendar days after it is first brought into service. If the fuel metering and emissions computation procedures for a new spot charter are identical to a boat that is already addressed in the approved boat plan, a letter addendum stating this will suffice for the revision/re-submittal of the boat plan.
- (xii) Prior to bringing the boat into service for the first time, the permittee shall submit the information listed below to the District for any new/replacement crew and supply boat that meets the requirements set forth in (1) - (3) above, and for new spot charters that have not been previously used on the *SYU Project*. For spot charters, this information shall be submitted within thirty (30) calendar days after the boat is first brought into service. The permittee shall notify the District Project Manager (via fax or e-mail) within three (3) calendar days after a new spot charter is first brought into operation. Any boat put into service that does not meet the requirements above, as determined by the District at any time, shall immediately cease operations and all prior use of that boat shall be considered a violation of this permit.
- (1) Boat description, including the type, size, name, engine descriptions and emission control equipment.
  - (2) Engine manufacturer's' data on the emission levels for the various engines and applicable engine specification curves. *For EPA Tier certified engines, provide the EPA engine certification data to demonstrate that the specific engine model and model year meet the specified Tier standards.*
  - (3) A quantitative analysis using the operating and emission factor assumptions given in tables 5-1 and 5-2 of this permit that demonstrates criteria (b) above is met.
  - (4) Estimated fuel usage within 25-miles of Platform Hondo.
  - (5) Any other information the District deems necessary to ensure the new boat will operate consistent with the analyses that form the basis for this permit.
- (xiii) *Validity of ERCs* - The ERCs generated by DOI 0042 Mod - 02 are valid only for the *M/V Ryan T* and *M/V Capt T Le* crew boat which replaced the *M/V Broadbill*. Any alteration to the engines installed in the *M/V Ryan T* and *M/V Capt T Le* or alteration to the actual crew boat operated by the permittee shall require a modification to the DOI and to the underlying ATC to re-analyze the validity of the ERCs. If the District determines that the ERCs are no longer valid, then the

permittee shall provide substitute ERCs and apply for necessary permit modifications.

- (c) **Monitoring:** The permittee shall fully implement the District approved *Boat Monitoring and Reporting Plan* for the life of the project and shall obtain District approval for any proposed updates or modifications to the Plan. This plan documents the recordkeeping and reporting procedures for boat activity, fuel usage, and emissions.
- (i) The permittee may use alternative methods (including location methods) for documenting and reporting boat activity, fuel usage and emissions, provided these methods are approved by the District as being equivalent in accuracy and reliability to those of the District's *Data Reporting Protocol for Crew and Supply Boat Activity Monitoring* document (dated June 21, 1991).
  - (ii) Spot charter boats shall, at a minimum, track total fuel usage on a per day basis using District-approved procedures. These data shall be submitted in a District-approved format to the District.
- (d) **Recordkeeping:** The following records shall be maintained in legible logs and shall be made available to the District upon request:
- (i) *Maintenance Logs* - For all main and auxiliary engines on DPV crew and DPV supply boats, maintenance log summaries that include details on injector type and timing, setting adjustments, major engine overhauls, and routine engine maintenance. These log summaries shall be made available to the District upon request. For each main and auxiliary engine with timing retard, a District Form – 10 (*IC Engine Timing Certification Form*) must be completed each time the engine is serviced.
  - (ii) *Crew Boat Fuel Usage* - Daily, monthly, quarterly and annual fuel use for crew boat main engines and auxiliary engines while operating within 25-miles of the platform, itemized by DPV and spot charter boats. In addition, the fuel use must be summarized for all crew boats by main and auxiliary engines.
  - (iii) *Supply Boat Fuel Usage* - Daily, monthly, quarterly and annual fuel use for supply boat main engines and auxiliary engines while operating within 25-miles of the platform, itemized by DPV and spot charter boats. In addition, the fuel use must be summarized for all supply boats by main and auxiliary engines.
  - (iv) *Emergency Response Boat Fuel Usage* - Total quarterly and annual fuel use for the emergency response boat and Platform Heritage's allocation of that total.
  - (v) The sulfur content of each fuel shipment delivered to the boats as documented by fuel supplier records (e.g., billing vouchers, or bills of lading).
- (e) **Reporting:** On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the District. The report must list all crew, supply and spot charter boat data required by the *Compliance Verification Reports* condition of this permit:

- (i) If, at any time, the District determines that logs or reports indicate fuel use greater than the limits of Condition 9.C.1(b) of this permit, the permittee shall restrict its vessel activities to ensure that emissions do not exceed total quarterly emissions allowed in the permit, or shall submit an application for and obtain a permit providing additional offsets. Such offsets shall be in place no later than the start of the next quarter. [Re: District Rule 1303, PTO 9102, ATC/PTO 10038, ATC/PTO 10169, ATC/PTO 10738, ATC/PTO 10800, ATC/PTO 11236, ATC 11986, 40 CFR 70.6]

C.6 **Pigging Equipment.** The following equipment are included in this emissions category:

Device Type	District Device No
<b><i>Pigging Equipment (Table F)</i></b>	
Emulsion Pig Launcher	102539
Gas Pig Launcher	102540

- (a) Emission Limits: Mass emissions from the emulsion and gas pig receivers and launchers listed above shall not exceed the limits listed in Tables 5.3 and 5.4. Compliance with this condition shall be based on the operational, monitoring, recordkeeping and reporting conditions in this permit.
- (b) Operational Limits: Operation of the equipment listed in this section shall conform to the requirements listed in District Rule 325.E. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit. In addition the permittee shall meet the following requirement:
  - (i) *Events* - The number of emulsion and gas pig operations (events) shall not exceed the maximum operating schedule listed in Table 5.1.
  - (ii) *Pressure* - Prior to opening a pig receiver/launcher, the receiver launcher shall be depressurized to the vapor recovery system or flare to the maximum extent feasible until the receiver/launcher reaches a pressure 1 psig or less. Prior to opening the pig receiver/launcher, the permittee shall purge the vessel with water (optional) and inert or sweet produced gas (not to exceed 30 ppmv total sulfur content calculated as H<sub>2</sub>S at standard conditions, and not greater than 23 lbs/lb-mole and 30% (by weight) ROC) and then bleeding the vessel to the vapor recovery system or flare. At no time shall the pig receiver/launcher hatch be opened when the pressure in the receiver/launcher is greater than 1 psig. Compliance shall be based on a test gauge or equivalent District-approved monitor installed to monitor the internal pressure of the receiver/launcher. Pressure readings shall be recorded prior to each opening of the receiver/launcher.
  - (iii) *Openings* - Access openings to the pig receiver/launcher shall be kept closed at all times, except when a pipeline pig is being placed into or removed from the receiver/launcher.

- (c) Monitoring: The permittee shall monitor the pressure inside the pig receivers and launchers with a District-approved pressure test gauge or equivalent District-approved monitor installed to determine the internal pressure of the receiver/launcher.
- (d) Recordkeeping: The permittee shall record in a log the date of each pigging operation and the pressure inside the receiver/launcher prior to each opening.
- (e) Reporting: On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the District. The report must list all data required by the *Compliance Verification Reports* condition of this permit. [Re: *District Rules 325 and 1303, PTO 9102, ATC 9828, ATC/PTO 10038, 40 CFR 70.6*]

C.7 **Tanks/Sumps/Separators.** The following equipment are included in this emissions category:

Device Name	ExxonMobil ID	KVB Service	District Device No
<b>Group A Units</b>			
Open Drain Sump	ABH-406	2 <sup>o</sup> heavy oil	005364
Wellbay Drain Sump	ABH-405	2 <sup>o</sup> heavy oil	005365
Skim Pile	ABH-416	2 <sup>o</sup> heavy oil	005367
Drilling Settling Tank	ABJ-417	2 <sup>o</sup> heavy oil	005368
<b>Group B Units</b>			
Closed Drain Sump	MBH-132	2 <sup>o</sup> heavy oil	005363
Amine Sump	MBH-170	2 <sup>o</sup> heavy oil	005366
Emulsion Surge Tank	MBJ-110	2 <sup>o</sup> heavy oil	107171
<b>Group C Units</b>			
Chemical Storage Tote Tanks			102381

- (a) Emission Limits: Mass emissions from the equipment listed above shall not exceed the limits listed in Tables 5.3 and 5.4. Compliance with this condition shall be based on the operational, monitoring, recordkeeping and reporting conditions in this permit.
- (b) Operational Limits: All process operations from the Group A equipment listed in this section shall meet the requirements of District Rule 325, Sections D.3, D.4, E, F and G. All process operations from the Group B equipment listed in this section shall meet the requirements of District Rule 325, Sections F.5 and F.6. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit. In addition, the permittee shall:
  - (i) *VRS Use* - The vapor recovery systems shall be in operation when the equipment connected to the VRS systems at the facility are in use. The VRS system includes piping, valves, and flanges associated with each VRS system. Each VRS system shall be maintained and operated to minimize the release of emissions from all systems, including pressure relief valves and gauge hatches.
  - (ii) *Vapor Recovery System Efficiency* - The vapor recovery system maintain a minimum efficiency of 95 percent (mass basis). Compliance shall be based on the monitoring, recordkeeping and reporting requirements of this permit.

- (iii) *Service Type Restrictions* - The KVB service type, as defined pursuant to District P&P 6100.060, for each Group A and Group B unit shall be restricted to the service type listed above or a service of a lesser emitting type (e.g., a secondary heavy oil sump may be used as a tertiary heavy oil sump).
- (iv) *Rule 326 Applicability* – The permittee shall not use any tank, container or vessel that is subject to the requirements of Rule 326 without first obtaining an ATC permit from the District for such use.
- (c) **Monitoring:** The equipment listed in this section are subject to all the monitoring requirements of District Rule 325.H (for Group A units only). The test methods outlined in District Rule 325.G shall be used, as applicable.
- (d) **Recordkeeping:** The equipment listed in this section is subject to all the recordkeeping requirements listed in District Rule 325.F. In addition, the permittee shall maintain logs for the information listed below. These logs shall be made available to the District upon request:
  - (i) On a monthly basis, the total oil emulsion and produced gas production along with the number of days per month of production.
- (e) **Reporting:** The equipment listed in this section are subject to all the reporting requirements listed in District Rule 325.I. On a semi-annual basis, a report detailing the previous six month’s activities shall be provided to the District. The report must list all data required by the *Compliance Verification Reports* condition of this permit. [Re: *District Rules 325 and 1303, PTO 9102, 40 CFR 70.6*]

C.8 **Solvent Usage.** The following equipment are included in this emissions unit category:

<b>Device Type</b>	<b>District Device No</b>
Solvent Usage Cleaning/Degreasing	005369

- (a) **Emission Limits:** Mass emissions from the solvent usage shall not exceed the limits listed in Tables 5.3 and 5.4. Compliance shall be based on the operational, recordkeeping and reporting requirements of this permit. For short-term emissions, compliance shall be based on monthly averages.
- (b) **Operational Limits:** Use of solvents for cleaning, degreasing, thinning and reducing shall conform to the requirements of District Rules 317, 321 and 324. Compliance with these rules shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit and facility inspections. In addition, the permittee shall comply with the following:

- (i) *Containers* - Vessels or containers used for storing materials containing organic solvents shall be kept closed unless adding to or removing material from the vessel or container.
  - (ii) *Materials* - All materials that have been soaked with cleanup solvents shall be stored, when not in use, in closed containers that are equipped with tight seals.
  - (iii) *Solvent Leaks* - Solvent leaks shall be minimized to the maximum extent feasible or the solvent shall be removed to a sealed container and the equipment taken out of service until repaired. A solvent leak is defined as either the flow of three liquid drops per minute or a discernible continuous flow of solvent.
  - (iv) *Reclamation Plan* – The permittee shall abide by the procedures identified in the District approved Solvent Reclamation Plan that describes the proper disposal of any reclaimed solvent. All solvent disposed of pursuant to the District approved Plan will not be assumed to have evaporated as emissions into the air and, therefore, will not be counted as emissions from the source. The Plan details all procedures used for collecting, storing and transporting the reclaimed solvent. Further, the ultimate fate of these reclaimed solvents must be stated in the Plan.
- (c) Monitoring: None.
- (d) Recordkeeping: The permittee shall record in a log the following on a monthly basis for each solvent used: amount used; the percentage of ROC by weight (as applied); the solvent density; and the amount of solvent reclaimed for District-approved disposal according to the District-approved *Solvent Reclamation Plan*. Based on the District approved Solvent Reclamation Plan, the permittee shall also record whether the solvent is photochemically reactive; and, the resulting emissions of ROC to the atmosphere in units of pounds per month and the resulting emissions of photochemically reactive solvents to the atmosphere in units of pounds per month. Product sheets (MSDS or equivalent) detailing the constituents of all solvents shall be maintained in a readily accessible location at Platform Heritage.
- (e) Reporting: On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the District. The report must list all data required by the *Compliance Verification Reports* condition of this permit. [*Re: District Rules 317, 321, 324 and 1303, PTO 9102, ATC/PTO 10038, 40 CFR 70.6*]

C.9 **Recordkeeping.** All records and logs required by this permit and any applicable District, state or federal rule or regulation shall be maintained for a minimum of five calendar years from the date of information collection and log entry at the platform. These records or logs shall be readily accessible and be made available to the District upon request. [*Re: District Rule 1303, PTO 9102, ATC 9634, PTO 9634, ATC 9828, ATC/PTO 10038, 40 CFR 70.6*]

C.10 **Semi-Annual Compliance Verification Reports.** Twice a year, the permittee shall submit a compliance verification report to the District. Each report shall document compliance with all permit, rule or other statutory requirements during the prior two calendar quarters. The first report shall cover calendar quarters 1 and 2 (January through June) and the second report shall cover calendar quarters 3 and 4 (July through December). The reports shall be submitted by March 1<sup>st</sup> and September 1<sup>st</sup> each year. Each report shall contain information necessary to verify compliance with the emission limits and other requirements of this permit and shall document compliance separately for each calendar quarter. These reports shall be in a format approved by the District, and shall be submitted in both hardcopy and electronic (PDF) format. The hardcopy submittal may be waived by the District with prior written approval. Compliance with all limitations shall be documented in the submittals. All logs and other basic source data not included in the report shall be made available to the District upon request. The second report shall also include an annual report for the prior four quarters. Pursuant to Rule 212, a completed *District Annual Emissions Inventory* questionnaire should be included in the annual report or submitted electronically via the District website. The permittee may use the Compliance Verification Report in lieu of the Emissions Inventory questionnaire if the format of the CVR is acceptable to the District's Emissions Inventory Group and if the permittee submits a statement signed by a responsible official stating that the information and calculations of quantifies of emissions of air pollutants presented in the CVR are accurate and complete to best knowledge of the individual certifying the statement. The report shall include the following information:

- (a) *Internal Combustion Engines.*
  - (i) The daily, quarterly and annual operating hours (or fuel use) data for each pedestal crane engine and for each cement pump, and the cuttings reinjection pump engine, in units of hours (or gallons).
  - (ii) Malfunctions during the reporting period of air pollution control equipment serving the pedestal crane. The compliance report must include the number, duration, and a brief description for each type of malfunction which occurred and what caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction to minimize emissions in accordance with 40 CFR 63 Subpart ZZZZ §63.6605(b), including actions taken to correct a malfunction.
  - (iii) Hours of operation for each use of the emergency generator engines and firewater pumps categorized as follows:
    - (1) Emergency use hours of operation for each emergency generator and firewater pump.\*\*
    - (2) Maintenance and testing hours of operation for each emergency generator and firewater pump.\*\*
    - (3) Hours of operation for all uses other than for emergency use and maintenance and testing, along with a description of what those hours were for each emergency generator and firewater pump.\*\*
  - (iv) A statement that all diesel fuel delivered to the boats or the platform was CARB diesel (Records may be requested by the District).
  - (v) On an annual basis, the heating value of all diesel fuel, in units of Btu/gal.
  - (vi) Documentation of any equivalent routine engine replacement.

- (vii) For Engines subject to the RICE MACT the following shall be reported:
- (1) The date of each engine oil change, the number of hours of operation since the last oil change, and the date and results of each oil analysis.
  - (2) The date of each engine air filter inspection and the number of hours of operation since the last air filter inspection. Indicate if the air filter was replaced as a result of the inspection.
  - (3) The date of each engine's hose and belts inspection and the number of hours of operation since the last hose and belt inspection. Indicate if any hose or belt was replaced as a result of the inspection.

\*\*District Form ENF-92 (*Diesel-Fired Emergency Standby Engine Recordkeeping Form*) can be used for requirements (2)-(4).

- (viii) The Compliance Report must contain the information below:

- (1) Company name and address.
- (2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
- (3) Date of report and beginning and ending dates of the reporting period.

If there are no deviations from any emission or operating, a statement that there were no deviations from the emission or operating limitations during the reporting period.

- (ix) For each deviation from an emission or operating limitation that occurs for a stationary RICE, the compliance report must contain the information in Conditions 5.a.i-iv of 40 CFR 63 Subpart ZZZZ and the information below:
- (1) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
  - (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

- (b) *Central Process Heater.*

- (i) The daily, quarterly and annual fuel use for the Central Process Heater in units of standard cubic, broken down by natural gas and propane.
- (ii) The monthly total sulfur content of the natural gas and propane combusted as fuel gas.
- (iii) All data required to be reported by the *Platform Heritage Central Process Heater Monitoring Plan* approved August 12, 2015, or the most recent District-approved version of the Plan.



- (iv) Quarterly Cylinder Gas Audit (CGA) reports for the in-line continuous hydrogen sulfide analyzer in accordance with the most recent District-approved *Fuel Gas Sulfur Reporting Plan*.
- (c) *Flare.*
- (i) The volumes of gas combusted and resultant mass emissions for each flare category (i.e., Purge/Pilot; Continuous - LP; Continuous - AG; Planned Other; Planned - Other), shall be presented as a cumulative summary for each day, quarter and year. Unplanned flaring shall be presented as a cumulative summary for each quarter and year only.
  - (ii) The highest total sulfur content and hydrogen sulfide content observed each week in the flare header.
  - (iii) The monthly total sulfur content of flare purge and pilot fuel gas.
  - (iv) A copy of the Flare Event Log for the reporting period. Include a separate listing of all planned infrequent events that occurred more than four times per year from the same cause from the same processing unit or equipment type.
  - (v) Flare Gas Sulfur Content Logs for each platform per the District approved *Flare Gas Plan*
  - (vi) Rule 359.H Annual report for each platform per the District approved *Flare Gas Plan*.
- (d) *Fugitive Hydrocarbons.* Rule 331/Enhanced Monitoring fugitive hydrocarbon I&M program data (on a quarterly basis):
- (i) Inspection summary which includes a record of the total components inspections and the total number and percentage found leaking by component type, inspection frequency, and leak detection threshold (i.e. the component “Category” as defined in District Permit Guideline Document 15). The record shall also specify leaks from critical components.
  - (ii) Record of leaking components and associated component repair actions including dates of component re-inspections. Critical components shall be identified in the record.
  - (iii) Listing of components installed as BACT during the reporting year as approved by the District.
- (e) *Crew and Supply Boats.*
- (i) Daily, quarterly and annual fuel use for the crew boat main engines and auxiliary engines for the three operating scenarios defined in the District-approved *Boat Monitoring and Reporting Plan*. The three scenarios include crew boat operations within 25 miles of Platform Heritage, within 3 miles of shore, and within Santa Barbara County. The report will be itemized by DPV boat usage boat usage. In addition, the fuel use must be summarized for all crew boats by main and auxiliary engines.

- (ii) Daily, quarterly and annual fuel use for the supply boat main engines and auxiliary engines (including the bow thruster engine) for the three operating scenarios defined in the District-approved *Boat Monitoring and Reporting Plan*. The three scenarios include supply boat operations within 25 miles of Platform Heritage, within 3 miles of shore, and within Santa Barbara County. The report will be itemized by DPV boat usage. In addition, the fuel use must be summarized for all supply boats by main and auxiliary engines.
  - (iii) A statement that all diesel fuel delivered to the boats or the platform was CARB diesel.
  - (iv) Information regarding any new project boats servicing the permittee's OCS platforms as detailed in Permit Condition 9.C.5(b)(x).
  - (v) Maintenance log summaries including details on injector type and timing, setting adjustments, major engine overhauls, and routine engine tune-ups.
  - (vi) The annual hours of operation of the survival capsules, summarized monthly
  - (vii) Any other information required to be reported in the District-approved *Boat Monitoring and Reporting Plan*.
- (f) *Pigging*. For each pig receiver and launcher, the number of pigging events per day, quarter and year.
- (g) *Tanks/Sumps/Separators*.
- (i) On a monthly basis, the total oil emulsion and produced gas production along with the number of days per month of production.
  - (ii) For the Group A and B units, list any changes in service type and provide an explanation of the change(s) that occurred.
- (h) *Solvent Usage*. On a monthly basis: the amount of solvent used; the percentage of ROC by weight (as applied); the solvent density; the amount of solvent reclaimed; whether the solvent is photochemically reactive; and, the resulting emissions of ROC and photochemically reactive solvents to the atmosphere in units of pounds per month.
- (i) *General Reporting Requirements*.
- (i) On quarterly basis, the emissions from each permitted emission unit for each criteria pollutant in units of tons per quarter.
  - (ii) On quarterly basis, the emissions from each exempt emission unit for each criteria pollutant in units of tons per quarter. Include an annual summary of exempt equipment hours with emissions.
  - (iii) A summary of each and every occurrence of non-compliance with the provisions of this permit, District rules, and any other applicable air quality requirement.
  - (iv) The annual fuel gas analyses required per the *Process Stream Sampling and Analysis* permit condition of this permit, produced oil, fuel gas, and produced wastewater process stream analyses as required by condition 9.C.13 of this permit. Process stream analyses per Section 4.12.

- (v) Breakdowns and variances reported/obtained per Regulation V along with the excess emissions that accompanied each occurrence.
- (vi) Helicopter trips (by type and trip segments with emission calculations).
- (vii) A copy of all completed District-10 forms (*IC Engine Timing Certification Form*).
- (viii) A copy of the Rule 202 *De Minimis* Log for the stationary source.
- (ix) Summary results of all compliance emission source testing performed for the stationary IC engines, Central Process Heater and the crew and supply boats during the reporting period.

[*Re: PTO 9102, ATC 9634, PTO 9634, ATC 9828, ATC/PTO 10038, PTO 14009-01*]

C.11 **BACT.** The permittee shall apply emission control and plant design measures which represent Best Available Control Technology (BACT) to the operation of Platform Heritage as described in Section 4.10 and Tables 4.1 and 4.2 of this permit. BACT measures shall be in place and in operation at all times for the life of the project. BACT related monitoring, recordkeeping and reporting requirements are defined in those specific permit conditions. [*PTO 9102, ATC 9634, PTO 9634, ATC 14147*]

C.12 **Source Testing.** The following source testing provisions shall apply:

- (a) The permittee shall conduct source testing of air emissions and process parameters listed in Table 4.3 of this Permit to Operate. More frequent source testing may be required if the equipment does not comply with permitted limitations or if other compliance problems, as determined by the APCO, occur. Source testing of the crane engine and process heater shall be performed on a biennial schedule using June 1994 as the anniversary test date. The crane engine shall be loaded to the maximum safe load obtainable. Source testing of the crew and supply boat main engines shall occur on an annual basis using September of 1995 as the anniversary test date. The crew and supply boat main engines shall be tested at normal cruise speeds (minimum of 70 percent of maximum engine load). Only one crew boat and one supply boat shall be tested per year. Source testing of the cement and cuttings reinjection pump engines shall be performed if triggered by Rule 333.I.8.
- (b) The permittee shall submit a written source test plan to the District for approval at least thirty (30) calendar days prior to initiation of each source test. The source test plan shall be prepared consistent with the District's *Source Test Procedures Manual* (revised May 1990 and any subsequent revisions). This plan shall include a technical evaluation on how these engines will be tested at the maximum safest load. The permittee shall obtain written District approval of the source test plan prior to commencement of source testing. If the source testing procedure is identical to the previous source test, and the equipment to be source tested has not been modified since the previous source test, the most recent District approved source test plan can be used to conduct the source test. The permittee shall submit a letter at least 10 days before the source test (Attn: Engineering Supervisor) stating that the existing source test plan will be used for the planned source test. The District shall be notified at least ten (10) calendar days prior to the start of source testing activity to arrange for a mutually agreeable source test date when District personnel may observe the test.

- (c) Source test results shall be submitted to the District within forty-five (45) calendar days following the date of source test completion and shall be consistent with the requirements approved within the source test plan. Source test results shall document the permittee's compliance status with mass emission rates in Section 5 and applicable permit conditions, and rules. All District costs associated with the review and approval of all plans and reports and the witnessing of tests shall be paid by the permittee as provided for by District Rule 210.
- (d) A source test for an item of equipment shall be performed on the scheduled day of testing (the test day mutually agreed to) unless circumstances beyond the control of the operator prevent completion of the test on the scheduled day. Such circumstances include mechanical malfunction of the equipment to be tested, malfunction of the source test equipment, delays in source test contractor arrival and/or set-up, or unsafe conditions on site. Except in cases of an emergency, the operator shall seek and obtain District approval before deferring or discontinuing a scheduled test, or performing maintenance on the equipment item on the scheduled test day. Once the sample probe has been inserted into the exhaust stream of the equipment unit to be tested (or extraction of the sample has begun), the test shall proceed in accordance with the approved source test plan. In no case shall a test run be aborted except in the case of an emergency or unless approval is first obtained from the District. If the test cannot be completed on the scheduled day, then the test shall be rescheduled for another time with prior authorization by the District. Failing to perform the source test of an equipment item on the scheduled test day without a valid reason and without District's authorization shall constitute a violation of this permit. If a test is postponed due to an emergency, written documentation of the emergency event shall be submitted to the District by the close of the business day following the scheduled test day.
- (e) The timelines in (a), (b), and (c) above may be extended for good cause provided a written request is submitted to the District at least three days in advance of the deadline, and approval for the extension is granted by the District. [*Re: PTO 9102*]

C.13 **Process Stream Sampling and Analysis.** The permittee shall sample analyze the process streams listed in Section 4.12 of this permit according to the methods and frequency detailed in that Section. All process stream samples shall be taken according to District approved ASTM methods and must follow traceable chain of custody procedures. [*Re: District Rules 325, 331, 333, PTO 9102*]

- (a) Monitoring: The permittee shall analyze the process streams listed in this condition and in Section 4.12.
- (b) Recordkeeping: Process stream analyses data as required by this condition and in Section 4.12.

C.14 **Offsets - NSR.** The permittee shall offset all emissions of reactive organic compounds (ROC) associated with the issuance of ATC 9634, ATC 9828, ATC 9099 and PTO 9012 as detailed in Section 7 and Table 7.1 of this permit. Emission reduction credits sufficient to offset the permitted quarterly ROC emissions shall be in place for the life of the project. [*Re: ATC 9634, PTO 9634, ATC 9828, ATC 9099, PTO 9102*]

- C.15 **Offsets - Rule 359.** The permittee shall offset all emissions of oxides of sulfur (SO<sub>x</sub>) pursuant to Section 7 and Table 7.2 of this permit from the planned flaring of hydrocarbon gases on Platform Heritage as defined in District Rule 359. Emission reduction credits sufficient to offset the permitted quarterly SO<sub>x</sub> emissions due to planned flaring shall be in place for the life of the project. [Re: PTO 9102-01]
- C.16 **Process Monitoring Systems - Operation and Maintenance.** All platform process monitoring devices listed in Section 4.11.2 of this permit shall be properly operated and maintained according to manufacturer recommended specifications. The permittee shall implement the District approved *Process Monitor Calibration and Maintenance Plan* for the life of the project. This Plan details the manufacturer recommended maintenance and calibration schedules. Where manufacturer guidance is not available, the recommendations of comparable equipment manufacturers and good engineering judgment, is utilized. [Re: PTO 9102]
- C.17 **Permitted Equipment.** Only those equipment items listed in Attachment 10.4 are covered by the requirements of this permit and District Rule 201.B. [Re: District Rule 1303, PTO 9102, ATC 9634, PTO 9634, ATC 9828]
- C.18 **Mass Emission Limitations.** Mass emissions for each equipment item (i.e., emissions unit) associated with Platform Heritage shall not exceed the values listed in Tables 5.3 and 5.4. Emissions for the entire facility shall not exceed the total limits listed in Table 5.5. [Re: District Rule 1303, PTO 9102, ATC 9634, PTO 9634, ATC 9828, ATC/PTO 10038, 40 CFR 70.6]
- C.19 **Facility Throughput Limitations.** Platform Heritage production shall be limited to a monthly average of 75,000 barrels of oil emulsion<sup>8</sup> per day and 75 million standard cubic feet of produced gas per day. The permittee shall record in a log the volumes of oil emulsion and gas produced and the actual number of days in production per month. The above limits are based on actual days of operation during the month. [Re: PTO 9102]
- C.20 **Emission Factor Revisions.** The District may update the emission factors for any calculation based on USEPA AP-42 or District P&P emission factors at the next permit modification or permit reevaluation to account for USEPA and/or District revisions to the underlying emission factors. Further, the permittee shall modify its permit via an ATC application if compliance data shows that an emission factor used to develop the permit's potential to emit is lower than that documented in the field. The ATC permit shall, at a minimum, adjust the emission factor to that documented by the compliance data consistent with applicable rules, regulations and requirements. [Re: PTO 9102]
- C.21 **Abrasive Blasting Equipment.** All abrasive blasting activities performed on Platform Heritage shall comply with the requirements of the California Administrative Code Title 17, Sub-Chapter 6, Sections 92000 through 92530. [Re: District Rule 303, PTO 9102]

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<sup>8</sup> Oil emulsion is defined as the total amount of crude oil and water produced from the wells.

- C.22 **Produced Gas.** The permittee shall direct all produced gases to the main gas compressors, the flare header or other permitted control device when de-gassing, purging or blowing down any oil and gas well or tank, vessel or container that contains reactive organic compounds or reduced sulfur compounds due to activities that include, but are not limited to, process or equipment turnarounds, process upsets (e.g., well spikes), well blowdown and MMS ordered safety tests. [Re: District Rules 325, 331, PTO 9102]
- C.23 **Emergency Episode Plan.** Six months prior to each scheduled triennial operating permit reevaluation date, the permittee shall review and update the *Emergency Episode Plan* for Platform Heritage and submit it for District approval. [Re: District Rule 1303, PTO 9102]
- C.24 **Documents Incorporated by Reference.** The documents listed below, including any District-approved updates thereof, are incorporated herein and shall have the full force and effect of a permit condition for this operating permit. These documents shall be implemented for the life of Platform Heritage.
- (a) *Fugitive Emissions Inspection and Maintenance Program for Platforms Heritage and Harmony* (approved 03/1/1999).
  - (b) *Boat Monitoring and Reporting Plan* (approved 10/07/2020).
  - (c) *Diesel Engine Particulate Matter (PM) Operation and Maintenance Plan* (approved 05/20/1999).
  - (d) *Flare Gas Sulfur Reporting Plan* (approved 12/23/1994).
  - (e) *Process Monitor Calibration and Maintenance Plan* (approved 05/05/2010).
  - (f) *Rule 359 Flare Minimization and Monitoring Plan* (approved 04/23/2010).
  - (g) *Rule 333 IC Engine Inspection and Maintenance Plan* (approved 07/30/2009).
  - (h) *Solvent Reclamation Plan* (approved 03/13/2000).
  - (i) *Flare Ignition System Maintenance Plan* (approved 01/04/2002).
  - (j) *Fuel Gas Sulfur Reporting Plan* (approved 02/05/13)
  - (k) *Emergency Episode Plan* (approved 01/30/1997)
  - (l) *Rule 343 Purging/Degassing Plan* (approved 03/04/2014)
  - (m) *Platform Heritage Central Process Heater Monitoring Plan* (approved 08/18/15)
- C.25 **Visible Emissions.**
- (a) Planned Flaring: No visible emissions shall occur from any planned flaring events. Once per calendar quarter, the permittee shall perform a visible emissions inspection for a one-minute period during a planned flaring event occurring during daylight hours. If a planned flaring event does not occur during daylight hours within the calendar quarter, no monitoring is required. The start-time and end-time of each visible emissions inspection shall be recorded in a log, along with a notation identifying whether visible emissions were detected. All records shall be maintained consistent with the recordkeeping condition of this permit.

- (b) Diesel Fueled IC Engines: No visible emissions shall occur from any diesel fueled engines. Once per calendar quarter, the permittee shall perform a visible emissions inspection for a one-minute period on each diesel engine when operating, except for diesel engine powered vehicles on-site and diesel engines that qualify as non-road engines per the definition in 40 CFR 89.2. For the firewater pump, the permittee shall perform a one-minute visible emission inspection each time the firewater pump is operated longer than 15-minutes during any testing or emergency drills (otherwise no inspection is required). The start-time and end-time of each visible emissions inspection shall be recorded in a log, along with a notation identifying whether visible emissions were detected. All records shall be maintained consistent with the recordkeeping condition of this permit.
- (c) Offshore Platform Crane: During biennial source testing of a crane, the permittee shall perform a visible emissions inspection for a one-minute period on the crane. The start-time and end-time of each visible emissions inspection shall be recorded in a log, along with a notation identifying whether visible emissions were detected. All records shall be maintained consistent with the recordkeeping condition of this permit.

C.26 **Gas Scrubber.** The following equipment are included in this emissions unit category:

Device Name	Operator ID	District Device No
Carbon Canister 1		114586
Carbon Canister 2		114587
Hydrogen Sulfide Scrubber		114588

- a. Operational Limits: Operation of the equipment listed in this section shall conform to the requirements listed in District Rules 310 and 325.E.1.c. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit. In addition the permittee shall meet the following requirements:
  - (i) The equipment listed in this permit shall be used only when there are no active production activities taking place on the platform and the flare has been taken out of service for maintenance or repair.
  - (ii) All vessels shall be depressurized to no greater than 0 psig prior to the flare being removed from service.
  - (iii) The permittee shall notify the District by noon of the next business day after bringing the gas scrubber system into operation and after taking it out of operation.
  - (iv) When the flare is out of service, all vapors from the flare system shall be vented through two carbon canisters and one hydrogen sulfide scrubber connected in series.
  - (v) The ROC removal efficiency across the gas scrubber system shall be greater than 90 percent (mass basis) or outlet stack ROC concentrations shall be  $\leq$  10 ppmv.

- (vi) The first carbon canister shall be replaced prior to breakthrough, as indicated by either:
  - (1) the ROC outlet concentration from the first carbon canister equaling (or exceeding) the inlet ROC concentration to the first canister, or
  - (2) outlet ROC concentration from the second carbon canister is greater than 10 percent of the inlet ROC concentration to the first carbon canister.

Dilution air or exhaust recirculation shall not be used in the carbon control system.

- (vii) The control system shall be leak-free, properly installed, and properly maintained at all times.
- (viii) At least two (2) back-up canisters with virgin carbon shall be maintained on site during periods when the carbon canister system is in use. Loose virgin carbon sufficient to completely refill two canisters may be used to satisfy this requirement. The back-up canister(s) shall be installed within one (1) hour after breakthrough is detected.
- (ix) The permittee shall notify the District no later than seven days after the date of initial operations each time the carbon canister system is brought into service.

b. Monitoring:

- (i) When the gas scrubber system is in operation, the inlet port and outlet port of each canister in the system shall be monitored twice per day. The monitoring for reactive organic compounds shall be done with an instrument which meets the requirements of EPA Method 21 and is equipped with an activated carbon filter probe adapter. Two readings shall be taken at each monitoring location: one with the filter and one without the filter. The difference between the two readings at each port is the ROC concentration at that port. The inlet and outlet readings shall be taken within 15 minutes of each other. The permittee may submit an alternate monitoring plan. The plan shall detail how the system will be operated and monitored to ensure compliance with the operational limitations of this permit. The permittee may not implement the alternate monitoring plan without written District approval.
- (ii) If breakthrough is detected, all carbon canisters upstream of the last canister must be replaced with a backup canister using virgin carbon within one (1) hour of detection. The last canister may be used to replace one of the upstream canisters. At all times the carbon in the last canister shall be as new as, or newer than, the carbon in the upstream canisters. The permittee shall be in violation of this condition if the carbon is not replaced within one hour of detection of breakthrough.
- (iii) Monitoring for hydrogen sulfide shall be done twice a day with a portable H<sub>2</sub>S monitor or an alternative method approved by the District.
- (iv) Any new temporary fugitive hydrocarbon emitting components (valves, flanges, connections, etc.) shall be monitored on the first day of operation of the control system in accordance with the current District-approved *Fugitive Emissions Inspection and Maintenance Plan* (approved 7/15/1994). Repairs shall be made to any leaking components.



- c. Recordkeeping: The installation date and replacement date of each canister shall be recorded, along with the cumulative hours of use of each canister. A log shall be maintained documenting the times of the daily ROC readings, portable analyzer calibration records, H<sub>2</sub>S readings, the ppmv values and the efficiency results.
- d. Reporting: A report containing all information required by the recordkeeping condition shall be submitted within 30 days of removing the control system from service. In addition, the report shall be included in the *Compliance Verification Report* required by this permit.

**C.27 Facility Shutdown Due to Pipeline Failure.** The permit conditions listed in Table 9.1 below shall not apply to equipment units that are non-operational during temporary facility shutdown conditions caused by the failure and shutdown of Plains All American Pipeline Lines 901 and 903. In addition, the otherwise applicable requirements of the District Prohibitory Rules listed in Table 9.2 below shall not apply to equipment units that are non-operational during temporary facility shutdown conditions caused by the failure and shutdown of Plains All American Pipeline Lines 901 and 903. All permit conditions and District Prohibitory Rules, with the exception of source testing conditions, shall be considered fully enforceable immediately upon startup of facility operations. All permit conditions related to source testing shall be enforceable 90 calendar days following startup of facility operations. For the purposes of this condition, startup of facility operations shall be defined as the date that the facility resumes produced oil and/or gas production. The permittee shall submit a written notification to the District no less than 60 calendar days prior to the startup of facility operations. Notwithstanding the above, the permittee shall retain the obligation to comply with all other permit conditions and local, state and federal rules and regulations not specifically referenced in Table 9.1 and Table 9.2 below.

**Table 9.1 Permit Conditions**

Condition	Condition	Sub-Condition Name	Permit Requirement
9.C.2(c)(i)	Combustion Equipment – Central Process Heater	Monitoring	Fuel Meters
9.C.2(c)(ii)	Combustion Equipment – Central Process Heater	Monitoring	Source Testing
9.C.2(c)(iv)	Combustion Equipment – Central Process Heater	Monitoring	Natural Gas Fuel Data
9.C.2(c)(v)	Combustion Equipment – Central Process Heater	Monitoring	Platform Heritage Central Heater Monitoring Plan
9.C.2(d)(i)	Combustion Equipment – Central Process Heater	Recordkeeping	Natural Gas Fuel Use
9.C.2(d)(ii)	Combustion Equipment – Central Process Heater	Recordkeeping	Sulfur Content
9.C.2(d)(iv)	Combustion Equipment – Central Process Heater	Recordkeeping	Platform Heritage Central Heater Monitoring Plan
9.C.3(d)(i)	Combustion Equipment - Flare	Recordkeeping	Flare Volumes

<b>Condition</b>	<b>Condition</b>	<b>Sub-Condition Name</b>	<b>Permit Requirement</b>
9.C.3(d)(ii)	Combustion Equipment - Flare	Recordkeeping	Purge/Pilot Gas
9.C.3(d)(iii)	Combustion Equipment - Flare	Recordkeeping	Flaring Sulfur Content
9.C.3(d)(iv)	Combustion Equipment - Flare	Recordkeeping	Pilot Flame Detection
9.C.3(e)(ii)	Combustion Equipment - Flare	Recordkeeping	Volume of Gas Combusted
9.C.3(e)(iii)	Combustion Equipment - Flare	Recordkeeping	Pilot/Purge Gas Volume
9.C.4(b)(i)	Fugitive Hydrocarbon Emissions Components	Operational Limits	VRS Use
9.C.4(c)(i)	Fugitive Hydrocarbon Emissions Components	Monitoring	ERCs
9.C.7(b)(i)	Tanks/Sumps/Separators	Operational Limits	VRS Use
9.C.7(d)	Tanks/Sumps/Separators	Recordkeeping	N/A
9.C.10(b)(i)	Semi-Annual Compliance Verification Reports	Central Process Heater	Fuel Use
9.C.10(b)(ii)	Semi-Annual Compliance Verification Reports	Central Process Heater	Total Sulfur Content
9.C.10(b)(iii)	Semi-Annual Compliance Verification Reports	Central Process Heater	Platform Heritage Central Heater Monitoring Plan
9.C.10(c)	Semi-Annual Compliance Verification Reports	Flare	N/A
9.C.10(f)	Semi-Annual Compliance Verification Reports	Pigging	N/A
9.C.10(g)(i)	Semi-Annual Compliance Verification Reports	Tanks/Sumps/Separators	Production
9.C.10(i)(iv)	Semi-Annual Compliance Verification Reports	General Reporting Requirements	Fuel Gas Analyses
9.C.12(b)	Source Testing	N/A	Source Test Plan
9.C.12(c)	Source Testing	N/A	Source Test Results
9.C.12(d)	Source Testing	N/A	Source Test Schedule Date
9.C.12(e)	Source Testing	N/A	Timelines
9.C.13	Process Stream Sampling and Analysis	N/A	N/A
9.C.16	Process Monitoring Systems - Operation and Maintenance	N/A	N/A
9.C.19	Facility Throughput Limitations	N/A	N/A
9.C.24(d)	Documents Incorporated by Reference	Flare Gas Sulfur Reporting Plan	N/A

Condition	Condition	Sub-Condition Name	Permit Requirement
9.C.24(e)	Documents Incorporated by Reference	Process Monitor Calibration and Maintenance Plan	N/A
9.C.24(j)	Documents Incorporated by Reference	Fuel Gas Sulfur Reporting Plan	N/A
9.C.24(m)	Documents Incorporated by Reference	Platform Heritage Central Heater Monitoring Plan	N/A

**Table 9.2 Rules and Regulations**

Rule	Rule Name	Sections	Section Name
325	Crude Oil Production and Separation	F.4	Requirements – Recordkeeping
342	Boilers, Steam Generators, and Process Heaters (5 MMBtu/hr and Greater)	G.1 I.1, I.3, I.4 J.1	Requirements – Source Testing Requirements – Recordkeeping Requirements – Reporting
359	Flares and Thermal Oxidizers	D.2.b.1, D.2.b.2 F G H	Requirements Source Testing Monitoring and Recordkeeping Reporting

- C.28 **Facility Restart Plan.** The permittee shall submit a Facility Start-up Plan to the District no less than 60 calendar days prior to facility startup. The Start-up Plan shall detail all maintenance that will be performed prior to facility startup. The plan shall also detail the expected compliance dates with any conditions or Rule sections listed in Tables 9.1 and 9.2 applicable to equipment subject to Condition C.27.
- C.29 **Facility Restart Fugitive Emissions Inspection.** The permittee shall initiate monthly Rule 331 I&M inspections, in accordance with the facility’s approved *I&M Plan*, for all fugitive components subject to Condition 9.C.4 for the first three (3) calendar months after resuming produced oil and/or gas processing operations, with the first monthly inspection occurring within 7 days of the start of operations. After the initial three (3) monthly Rule 331 I&M inspections are completed, the inspection frequency for fugitive components subject to Condition 9.C.4 shall revert to the inspection schedule identified for the component category in Condition 9.C.4.b(vii) – (ix).

## 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.

= There are no permit conditions that are District-only enforceable for this permit =

AIR POLLUTION CONTROL OFFICER

\_\_\_\_\_  
\_\_\_\_\_  
Date

### Attachments:

- 10.1 - Emission Calculation Documentation
- 10.2 - Further Calculations for Section 5
- 10.3 - Equipment List
- 10.4 - Permittee Comments on the Draft Permit and District Responses

### Notes:

Reevaluation Due Date: April 2024  
Semi-Annual reports are due by March 1<sup>st</sup> and September 1<sup>st</sup> of each year.  
This permit supersedes: PTO PT-70 9102-R7  
This permit incorporates: PT-70 ADM 16128, PT-70 ADM 16241, and Trn O/O 09102

\\sbcapcd.org\shares\Groups\ENGR\WP\Oil&Gas\Major Sources\SSID 01482 Exxon - SYU Project\Permits - Heritage\Reevals\Reeval PTO 9102-R8\Draft PT-70 09102 R8 - Platform Heritage - 4-8-2024.docx

## 10.0 Attachments

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### 10.1. Emission Calculation Documentation

This attachment contains all relevant emission calculation documentation used for the emission tables in Section 5. Refer to Section 4 for the general equations. The letters A-H refer to Tables 5.1 and 5.2.

#### Reference A - Combustion Engines

1. The maximum operating schedule is in units of hours.
2. BSFC = 6,480 Btu/bhp-hr - East Crane
  - a. energy based value using LHV
  - b. Detroit Diesel 8V-92TA engine specification basis = 0.352 lb/bhp-hr
3. Emission factors units (lb/MMBtu) are based on HHV.
4. LCF (LHV to HHV) value of 6 percent used.
5. NO<sub>x</sub> emission factor for crane engine based on Rule 333 limit (8.4 g/bhp-hr)

$$E_{lb/MMBtu} = \left[ \frac{(8.4 \text{ g/bhp}) * 10^6}{(6480 \text{ Btu/bhp-hr}) * 1.06 * 453.6} \right]$$

6. SO<sub>x</sub> emissions based on mass balance

$$SO_x (asSO_2) = \frac{[(\%S) * (\rho_{oil}) * 20,000]}{HHV}$$

7. Allowable sulfur content of 0.0015 wt. % consistent with CARB diesel (CCR Title 17, section 93115).
8. Crane engine operational limits: General Equation

$$Q = \frac{(BSFC) * (bhp) * (LCF) * (hours/timeperiod)}{HHV}$$

9. Firewater pumps, emergency production generator, and survival capsule engines emission factors for NO<sub>x</sub>, ROC, CO, and PM/PM<sub>10</sub>/PM<sub>2.5</sub> based on AP-42 section 3.3.

- 10 The cuttings reinjection pump engine emissions are based on the following calculation:

The NO<sub>x</sub> and CO BACT concentration limit in units of ppmvd @ 15% O<sub>2</sub> was calculated using the following equation:

$$\text{ppmvd} = [\text{EFg/bhp-hr} \times \text{mv} \times 1012] / [\text{FD} \times \text{EAC} \times \text{BSFC} \times \text{CF1} \times \text{MWp}]$$

where:

EF	=	pollutant emission factor (g/bhp-hr)
mv	=	molar volume (379 std ft <sup>3</sup> S/lb-mol S -- assumes std temp of 60°F)
FD	=	F-factor exhaust volume at 0% O <sub>2</sub> and 60°F (dscf/MMBtu)
EAC	=	excess air correction (0% O <sub>2</sub> to 15% O <sub>2</sub> => EAC = 3.5424)
BSFC	=	engine brake-specific fuel consumption - HHV based (Btu/bhp-hr)
CF1	=	grams to pounds conversion factor (453.6 g/lb)
MWp	=	molec. weight of pollutant (lb/lb-mol=> NO <sub>x</sub> = 46, CO = 28, VOC=16)

NO<sub>x</sub> ppmvd calculations:

$$\text{ppmvd} = \frac{[3.50 \text{ g/bhp-hr} \times 379 \text{ std ft}^3 \text{ S/lb-mol S} \times 10^{12}]}{[9190 \text{ dscf/MMBtu} \times 3.5424 \times 7524 \text{ Btu/bhp-hr} \times 453.6 \text{ g/lb} \times 46 \text{ lb/lb-mol}]} = 260 \text{ ppmv}$$

CO ppmvd calculations:

$$\text{ppmvd} = \frac{[3.25 \text{ g/bhp-hr} \times 379 \text{ std ft}^3 \text{ S/lb-mol S} \times 10^{12}]}{[9190 \text{ dscf/MMBtu} \times 3.5424 \times 7524 \text{ Btu/bhp-hr} \times 453.6 \text{ g/lb} \times 28 \text{ lb/lb-mol}]} = 396 \text{ ppmv}$$

10. The cement pump engine emission factors for NO<sub>x</sub>, ROC, CO, and PM/PM<sub>10</sub>/PM<sub>2.5</sub> are based on US EPA Tier 3 non-road standards.

See spreadsheet for calculation results

#### Reference B - External Combustion (Central Process Heater)

1. The maximum operating schedule is in units of hours.
2. CO emissions based on Rule 342 limit of 400 ppmvd at 3 percent O<sub>2</sub>. Using USEPA NSPS f-factors (corrected to District standard condition), this equates to an emission factor of 0.297 lb/MMBtu.
3. SO<sub>x</sub> emission factor based on mass balance:

$$SO_x (asSO_2) = \frac{[(0.169) * (ppmvS)]}{HHV}$$

4. Allowable sulfur content of 30 ppmv based on ATC 5651 (11/87)
5. Emissions based on heater maximum design throughput (27.2 MMBtu/hr) \* emission factor.
6. Sulfur content of the HD-5 propane: 123 ppmw. This equates to 165 ppmv S.

$$\text{ppmvS} = \left[ \frac{123 \text{ lbS}}{10^6 \text{ lbfuel}} \right] * \left[ \frac{\text{lb} - \text{molS}}{32 \text{ lbS}} \right] * \left[ \frac{\text{lbfuel}}{21,669 \text{ Btu}} \right] * \left[ \frac{379 \text{ scf}}{\text{lb} - \text{mol}} \right] * \left[ \frac{254 \text{ Btu}}{\text{scffuel}} \right]$$

7. Process Heater operational limits: General Equation

$$Q = \frac{(\text{MaxHeatInput}) * (\text{hours/timeperiod})}{HHV}$$

See spreadsheet for calculation results

Reference C - Combustion Flare

1. The maximum operating schedule for the purge/pilot gas and planned continuous flaring is in units of hours.
2. The maximum operating schedule for the planned other and unplanned flaring is in units of percentage of annual usage.
3. All flaring volumes based on the permittee application
4. HHV = 1300 Btu/scf for all flare and purge and pilot gas (per the permittee application)
5. "Planned continuous flaring" value based on one half the minimum detection limit of the flare meter:
  - a. Flare meter: Fluid Components LT 81A mass flow detection
  - b. Minimum flow detection limit of flow element: 0.25 standard feet per second
  - c. Flare header outside: 18-inches (schedule 10)
  - d. Minimum detection limit: 1,503 scfh (3.292 MMscf/qtr, 13.166 MMscf/yr)
6. Total planned continuous flaring is assumed to be one half the flare meter minimum detection limit (752 scfh). This value includes the purge fuel gas flow rate of 145 scfh. The pilot flow rate is 300 scfh. The purge value is backed out so as to perform correct sulfur oxide calculations.
7. SO<sub>x</sub> emissions from "planned continuous flaring": purge emissions (145 scfh) based on amine unit limit (30 ppmvd S); SO<sub>x</sub> emissions from the remainder of "planned continuous flaring" (607 scfh) based on 20,000 ppmvd S.
8. "Planned intermittent" (other) and "unplanned flaring" volumes based on the permittee application. SO<sub>x</sub> emissions based 20,000 ppmv S.
9. Planned intermittent (other) and unplanned flaring events not calculated for short-term events per District policy
10. The same emission factors are used for all flaring scenarios, except for SO<sub>x</sub>
11. SO<sub>x</sub> emissions based on mass balance

$$SO_x (asSO_2) = \frac{[(0.169) * (ppmvS)]}{HHV}$$

#### Reference D - Fugitive Components

1. The maximum operating schedule is in units of hours.
2. The component leak path definition differs from the Rule 331 definition of a component. A typical leak path count for a valve would be equal to 4 (one valve stem, a bonnet connection and two flanges).
3. Leak path counts are provided by applicant. The total count has been verified to be accurate within 5 percent of the District's P&ID and platform review/site checks.
4. Emission factors based on the District/Teacolote Report, *Modeling of Fugitive Hydrocarbon Emissions* (1/86), Model B as documented in District Policy & Procedure 6100.061 (9/98).

#### Reference E - Supply Boat

1. The maximum operating schedule is in units of hours.
2. Supply boat engine data based on Rincon Marine's *Santa Cruz*.
3. Two 2,000 bhp main engines (i.e., 4,000 bhp), two 200 bhp generator engines, and one 500 bhp bow thruster engine, and one 409 bhp winch are utilized. The engine bhp from the bulk transfer generator engine is not included, but emissions must be reported against the potential to emit.
4. Main engine load factor based on District *Crew and Supply Boat* study (6/87)
5. Supply boat bow thruster engine only operates during maneuver mode
6. Supply boat generator engines provide half of total rated load of each engine at the same time.
7. The District has standardized the total time a supply boat operates (per trip) within 25 miles of platform to 11 hours. A trip includes time to, from and at the platform. This is based on a typical trip consisting of: 8 hours cruise, 2 hours maneuver and 1 hour idle.
8. Main engine emission factors are based only on cruise mode values.
9. Supply boat main engines achieve a controlled NO<sub>x</sub> emission rate of 8.4 g/bhp-hr through the use of emission controls (e.g., turbo-charging, enhanced inter-cooling and 4° timing retard). This emission factor equates to 337 lb/1000 gallons.

$$EF_{NO_x} = \frac{(8.4 \text{ g/bhp-hr}) * 1000}{(0.055 \text{ gal/bhp-hr}) * (453.6 \text{ g/lb})}$$

10. Emissions from the Ocean Defender, the Ocean Guardian, the Ocean Scout, or the Ocean Sentinel are attributable to the Emergency Response emission liability category.



11. Uncontrolled NO<sub>x</sub> emissions from the emergency response boat main engines based on an emission rate of 14 g/bhp-hr. This emission factor equates to 561 lb/1000 gallons:

$$EF_{NO_x} = \frac{(14 \text{ g/bhp-hr}) * 1000}{(0.055 \text{ gal/bhp-hr}) * (453.6 \text{ g/lb})}$$

12. PM emission factor for the main engines are based on *Kelly, et. al.* (1981)
13. PM<sub>10</sub>:PM ratio = 0.96; ROC:TOC ratio = 1.0
14. All SO<sub>x</sub> emissions based on mass balance

$$SO_x (asSO_2) = \frac{[(\%S) * (\rho_{oil}) * 20,000]}{HHV}$$

15. Sulfur content basis of 0.0015 wt % is consistent with CARB diesel.
16. USEPA AP-42 emission factors converted to fuel basis using:

$$EF_{lb/kgal} = \frac{(EF_{lb/MMBtu}) * (19,300 \text{ Btu/lb}) * (7.05 \text{ lb/gal})}{1,000}$$

17. Emergency response vessel is permanently assigned to Platforms Henry, Hillhouse, A, B, C, Houchin, Hogan, Habitat, Hondo, Harmony, and Heritage. The emergency response vessel total bhp is 2,900 (main) and 89 (aux). Short-term emissions from this vessel are not assessed. Long-term emissions are assessed equally amongst the eleven affected platforms.
18. Emergency response vessel emissions calculated as an aggregate (main and auxiliary engines) using the uncontrolled supply boat emission factors. Fuel use for each platform shall not exceed 1,910 gallons per quarter or 7,641 gallons per year of diesel fuel.

$$T_{yr} = \frac{(7,641 \text{ gal/yr})}{[(0.055 \text{ gal/bhp-hr}) * (2900 \text{ bhp}) * 0.65]} = 74 \text{ hr/yr}$$

19. Main and auxiliary engine operational limits: General Equation

$$Q = (BSFC) * (bhp) * (hours/timeperiod) * (loadfactor)$$

see spreadsheet for calculated values

#### Reference F - Crew Boat

1. The maximum operating schedule is in units of hours.
2. Crew boat engine data based on Rincon Marine's *Callie Jean*: Four 965 bhp main engines (i.e.; 3,860 bhp), and two 131 bhp auxiliary engines.

3. *M/V Broadbill* crew boat engine data: Four 600 bhp main engines (Tier II) and two 62 bhp auxiliary engines (Tier II) subject to DOI 042-01.
4. The total permitted quarterly and annual emissions for the facility assume that the *M/V Broadbill* operates forty percent (40%) of the annual total DPV crew boat usage.
5. Main engine load factor based on District *Crew and Supply Boat* study (6/87).
6. Crew boat auxiliary engine provides half of total rated load.
7. The total time a crew boat operates (per trip) is 3.7 hours. A trip includes time to, from and at the platform. This is based on a typical trip consisting of: 1.7 hours cruise, 1 hour maneuver and 1 hour idle.
8. Crew boat main engines achieve a controlled NO<sub>x</sub> emission rate of 8.4 g/bhp-hr through the use of turbo-charging, inter-cooling and 4° timing retard. This emission factor equates to 337 lb/1000 gallons:

$$EF_{NO_x} = \frac{(8.4 \text{ g/bhp-hr}) * 1000}{(0.055 \text{ gal/bhp-hr}) * (453.6 \text{ g/lb})}$$

9. *M/V Broadbill* main engines achieve a controlled NO<sub>x</sub> emission rate of 5.46 g/bhp-hr through the use of DDEC electronic control systems and turbochargers. This emission factor equates to 218.98 lb/kgal.

$$EF_{NO_x} = \frac{(14 \text{ g/bhp-hr}) * 1000}{(0.055 \text{ gal/bhp-hr}) * (453.6 \text{ g/lb})}$$

10. PM emission factor for the main engines are based on *Kelly, et. al.* (1981).
11. PM<sub>10</sub>:PM ratio = 0.96; ROC:TOC ratio = 1.0.
12. Sulfur content basis of 0.0015 wt % is consistent with CARB diesel.
13. All SO<sub>x</sub> emissions based on mass balance:

$$SO_x (asSO_2) = \frac{[(\%S) * (\rho_{oil}) * 20,000]}{HHV}$$

14. USEPA AP-42 emission factors converted to fuel basis using:

$$EF_{lb/kgal} = \frac{(EF_{lb/MMBtu}) * (19,300 \text{ Btu/lb}) * (7.05 \text{ lb/gal})}{1,000}$$

15. Main and auxiliary engine operational limits: General Equation

$$Q = (BSFC) * (bhp) * (hours/timeperiod) * (loadfactor)$$

### Reference G - Pigging Equipment

1. Maximum operating schedule is in units of events.
2. Gas and oil launcher and receiver volumes, pressures and temperatures based on application.
3. All gas in launchers is blown down to the vapor recovery system or the flare relief system and purged with sweetened produced gas, nitrogen or water prior to opening the vessel to the atmosphere.
4. The remaining vessel pressure is no greater than 1 psig (15.7 psia). The temperature of the remaining vapor in both vessels = 100°F
5. The MW of purge gas = 23 lb/lb.
6. ROC weight % of purge gas = 30%
7. Calculate a site vessel specific emission factor, using the ideal gas law and the volume of the vessel, in units of "lb ROC/acf-event":

$$\rho = \left( \frac{(P_{ves} * MW)}{(R * T)} \right)$$

$$EF = \rho * ROC(wt\%)$$

Where:

$\rho$  = the density of vapor remaining in the vessel (lb VOC/acf).

EF = Emission Factor is units of lb ROC/acf event

### Reference H - Sumps/Tanks/Separators

1. Maximum operating schedule is in units of hours.
2. There are no oil/water separators on Platform Heritage.
3. Emission calculation methodology based on the CARB/KVB report *Emissions Characteristics of Crude Oil Production Operations in California* (1/83) as documented in District P&P 6100.060.
4. Calculations are based on surface area of emissions unit as supplied by the applicant.
5. All emission units are classified as secondary production and heavy oil service.
6. Controls (vapor recovery) are utilized only on the closed drain sump and the amine sump. The emission factors reflect a 95 percent control efficiency.

## Reference I - Solvents

1. All solvents not used to thin surface coatings are included in this equipment category.
2. Quarterly and annual emission rates per application. Daily number is annualized.
3. Hourly emissions based on daily value divided by an average 24-hour day. Compliance with daily value based on monthly emissions divided by the number of days per month. Compliance with hourly data to be based on the monthly daily average divided by 24.

### **GHG Emission Factor Basis:**

#### **Combustion Sources:**

GHG emissions from combustion sources are calculated using emission factors found in Tables C-1 and C-2 of 40 CFR Part 98 and global warming potentials found in Table A-1 of 40 CFR Part 98. CO<sub>2</sub> equivalent emission factors are calculated for CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O individually, then summed to calculate a total CO<sub>2e</sub> emission factor. Annual CO<sub>2e</sub> emission totals are presented in short tons.

For IC engines, the emission factor in lb/MMBtu heat input is converted to g/bhp-hr output based on a standard brake-specific fuel consumption.

#### **For natural gas combustion the emission factor is:**

$$(53.02 \text{ kg CO}_2/\text{MMBtu}) (2.2046 \text{ lb/kg}) = 116.89 \text{ lb CO}_2/\text{MMBtu}$$

$$(0.001 \text{ kg CH}_4/\text{MMBtu}) (2.2046 \text{ lb/kg})(21 \text{ lb CO}_2\text{e/lb CH}_4) = 0.046 \text{ lb CO}_2\text{e/MMBtu}$$

$$(0.0001 \text{ kg N}_2\text{O/MMBtu}) (2.2046 \text{ lb/kg})(310 \text{ lb CO}_2\text{e/lb N}_2\text{O}) = 0.068 \text{ lb CO}_2\text{e/MMBtu}$$

$$\text{Total CO}_2\text{e/MMBtu} = 116.89 + 0.046 + 0.068 = \underline{\underline{117.00 \text{ lb CO}_2\text{e/MMBtu}}}$$

#### **For diesel fuel combustion the emission factor is:**

$$(73.96 \text{ kg CO}_2/\text{MMBtu}) (2.2046 \text{ lb/kg}) = 163.05 \text{ lb CO}_2/\text{MMBtu}$$

$$(0.003 \text{ kg CH}_4/\text{MMBtu}) (2.2046 \text{ lb/kg})(21 \text{ lb CO}_2\text{e/lb CH}_4) = 0.139 \text{ lb CO}_2\text{e/MMBtu}$$

$$(0.0006 \text{ kg N}_2\text{O/MMBtu}) (2.2046 \text{ lb/kg})(310 \text{ lb CO}_2\text{e/lb N}_2\text{O}) = 0.410 \text{ lb CO}_2\text{e/MMBtu}$$

$$\text{Total CO}_2\text{e/MMBtu} = 163.05 + 0.139 + 0.410 = \underline{\underline{163.60 \text{ lb CO}_2\text{e/MMBtu}}}$$

#### **Converted to g/hp-hr:**

$$(163.60 \text{ lb/MMBtu})(453.6 \text{ g/lb})(7500 \text{ Btu/hp-hr})/1,000,000 = \underline{\underline{556.58 \text{ g/hp-hr as CO}_2\text{e}}}$$

## 10.2. Further Calculations for Section 5

This attachment contains emission calculation spreadsheets and other supporting calculations used for the emission tables in Section 5 and permit conditions in Section 9. Refer to Section 4 for the general equations, assumptions and emission factor basis used.

**Table 10.1 Variables Used in Emission Calculations**

Variable	Value	Units	Reference
HHV fuel gas	1,300	Btu/scf	Exxon 1994 PTO application
HHV propane	2,524	Btu/scf	American Gas Association
HHV Diesel #2	138,200	Btu/gal	Bureau of Standards Pub. 97 " <i>Thermal Properties of Petroleum Products</i> "
LCF	1.06	n/a	Chemical Engineer's Handbook, Figure 9-3, <i>Heat of Combustion of Petroleum Fuels</i> , 5th Ed
Diesel ICE PM10 Ratio	1.0	n/a	AP-42 Table 3.3-1, footnote (b), 10/96
Diesel ICE ROC Ratio	0.8378	n/a	APCD VOC/ROC Profile sheet (July 13, 1998)
Diesel Density	7.043	lb/gal	Bureau of Standards Pub. 97 " <i>Thermal Properties of Petroleum Products</i> "
Process Heater ROC Ratio	0.50	n/a	APCD VOC/ROC Profile sheet (July 13, 1998)
Process Heater PH PM10 Ratio	1.0	n/a	AP-42 Table 1.4-2, footnote (c), 3/98
Flare ROC Ratio	0.86	n/a	PTO 9102
Flare PM Ratio	1.0	n/a	PTO 9102

**Table 10.2 Fuel Use Limits**

Fuel Use Limits

IC Engines	Fuel Use Limits			
	gal/hr	gal/day	gal/qtr	gal/yr
East Crane	22.4	537	24,491	97,962
B - Side Cement Pumping Skid	28.8	690	62,990	251,961
C - Side Cement Pumping Skid	28.8	690	62,990	251,961
Cuttings Reinjection Pump	24.5	588	53,655	214,620

Central Process Heater	Fuel Use Limits			
	scf/hr	scf/day	MMscf/qtr	MMscf/yr
Natural Gas Fired	20,923	502,154	45.822	183.286
Propane Fired	10,777	64,659	0.862	3.448

TABLE 10.2 - Crew and Supply Boat Fuel Use Limits			
Platform Heritage			
Part 70 Reeval 9102-R8			
Supply Boats	gal/day	gal/qtr	gal/yr
Main Engine - DPV	3,146	60,318	241,272
Main Engine - Spot Charter	3,146	6,032	24,127
Generator Engine - DPV	242	5,878	23,512
Bow Thruster - DPV	83	2,004	8,015
Winch - DPV	67	1,639	6,557
Emergency Response (Main + Aux)	--	1,910	7,641
Crew Boats	gal/day	gal/qtr	gal/yr
Main Engine - DPV	3,916	35,622	142,487
Main Engine - DPV Broadbill	2,468	23,748	94,992
Main Engine - Spot Charter	3,916	5,937	23,748
Auxiliary Engines - DPV	156	6,052	24,209
Auxiliary Engines - DPV Broadbill	75	4,035	16,139

Note: The gal/hour (hourly) values listed for the pedestal crane, cement pump, and reinjection pump engines are for informational purposes only, and are not operational limits. Enforceable limits are defined in Condition 9.C.1 on a daily, quarterly, and annual basis.

**10.3. *Equipment List (Permitted and Exempt/Insignificant Equipment)***

A detailed equipment list is attached.

**A PERMITTED EQUIPMENT**

**1 Stationary Internal Combustion Engines**

**1.1 East Pedestal Crane**

<i>Device ID #</i>	<b>005350</b>	<i>Device Name</i>	<b>East Pedestal Crane</b>
<i>Rated Heat Input</i>	2.920 MMBtu/Hour	<i>Physical Size</i>	450.00 Brake Horsepower
<i>Manufacturer</i>	Detroit Diesel	<i>Operator ID</i>	ZZZ-507
<i>Model</i>	8V-92TA	<i>Serial Number</i>	8083-7400
<i>Location Note</i>	Drilling Deck, Platform Heritage		
<i>Device Description</i>	Crane, Fuel: D2, Lean non-cyclic		

**1.2 Oxidation Catalyst 1**

<i>Device ID #</i>	<b>386479</b>	<i>Device Name</i>	<b>Oxidation Catalyst 1</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Inline	<i>Operator ID</i>	
<i>Model</i>	IC-8-500	<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage, Serves the East Pedestal Crane		
<i>Device Description</i>	Combined oxidation catalyst and diesel particulate filter. Reduces carbon monoxide emissions from crane engine, 8,000 to 12,000 engine hour estimated lifespan		

**1.3 Oxidation Catalyst 2**

<i>Device ID #</i>	<b>387731</b>	<i>Device Name</i>	<b>Oxidation Catalyst 2</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	DCL America	<i>Operator ID</i>	
<i>Model</i>	DC63	<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage, Serves the East Pedestal Crane		
<i>Device Description</i>	Diesel Oxidation Catalyst from DCL America, does not contain a diesel particulate filter.		



#### 1.4 Auxiliary Drill Generator

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<i>Device ID #</i>	005370	<i>Maximum Rated BHP</i>	2307.00
<i>Device Name</i>	Auxiliary Drill Generator	<i>Serial Number</i>	25Z02989
<i>Engine Use</i>	Electrical Power	<i>EPA Engine Family Name</i>	
<i>Manufacturer</i>	Caterpillar	<i>Operator ID</i>	109715
<i>Model Year</i>	1993	<i>Fuel Type</i>	
<i>Model</i>	3516 DITA		
<i>DRP/ISC?</i>	No	<i>Healthcare Facility?</i>	No
<i>Daily Hours</i>		<i>Annual Hours</i>	
<i>Location Note</i>	Drilling Deck, Platform Heritage		
<i>Device Description</i>	Drilling, Fuel: D2, Lean, non-cyclic		

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#### 1.5 Firewater Pump (PBE-357)

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<i>Device ID #</i>	005372	<i>Maximum Rated BHP</i>	400.00
<i>Device Name</i>	Firewater Pump (PBE-357)	<i>Serial Number</i>	6TB-05348
<i>Engine Use</i>	Fire Water Pump	<i>EPA Engine Family Name</i>	
<i>Manufacturer</i>	Caterpillar	<i>Operator ID</i>	PBE-357
<i>Model Year</i>	1989	<i>Fuel Type</i>	
<i>Model</i>	3406-DITA		
<i>DRP/ISC?</i>	No	<i>Healthcare Facility?</i>	No
<i>Daily Hours</i>		<i>Annual Hours</i>	
<i>Location Note</i>	Cellar Deck, Platform Heritage		
<i>Device Description</i>	Emergency Use, Fuel: D2, lean/non-cyclic		

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#### 1.6 Emergency Production Generator

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<i>Device ID #</i>	005371	<i>Maximum Rated BHP</i>	1344.00
<i>Device Name</i>	Emergency Production Generator	<i>Serial Number</i>	67Z00647
<i>Engine Use</i>	Electrical Power	<i>EPA Engine Family Name</i>	
<i>Manufacturer</i>	Caterpillar	<i>Operator ID</i>	ZAN-515
<i>Model Year</i>	1989	<i>Fuel Type</i>	
<i>Model</i>	3512 DITA		
<i>DRP/ISC?</i>	No	<i>Healthcare Facility?</i>	No
<i>Daily Hours</i>		<i>Annual Hours</i>	
<i>Location Note</i>	Production Deck, Platform Heritage		
<i>Device Description</i>	Emergency Use, Fuel : D2, lean/non-cyclic		

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**1.7 Firewater Pump (PBE-367)**

<i>Device ID #</i>	007143	<i>Maximum Rated BHP</i>	525.00
<i>Device Name</i>	Firewater Pump (PBE-367)	<i>Serial Number</i>	67U17719
<i>Engine Use</i>	Fire Water Pump	<i>EPA Engine Family Name</i>	
<i>Manufacturer</i>	Caterpillar	<i>Operator ID</i>	PBE-367
<i>Model Year</i>	1997	<i>Fuel Type</i>	
<i>Model</i>	3408-DITA		
<i>DRP/ISC?</i>	No	<i>Healthcare Facility?</i>	No
<i>Daily Hours</i>		<i>Annual Hours</i>	
<i>Location Note</i>	Cellar Deck, Platform Heritage		
<i>Device Description</i>	Emergency Use, Fuel: D2, lean/non-cyclic		

**1.8 Survival Capsule #1**

<i>Device ID #</i>	<b>103956</b>	<i>Device Name</i>	<b>Survival Capsule #1</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	55.00 Brake Horsepower
<i>Manufacturer</i>	Ford	<i>Operator ID</i>	ZZZ-514
<i>Model</i>	FSE425	<i>Serial Number</i>	D1186-14LA
<i>Location Note</i>	Cellar Deck, Platform Heritage		
<i>Device Description</i>	Emergency Use, Fuel: D2, lean/non-cyclic		

**1.9 Survival Capsule #2**

<i>Device ID #</i>	<b>103957</b>	<i>Device Name</i>	<b>Survival Capsule #2</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	55.00 Brake Horsepower
<i>Manufacturer</i>	Ford	<i>Operator ID</i>	ZZZ-513
<i>Model</i>	FSE425	<i>Serial Number</i>	D118616-LA
<i>Location Note</i>	Cellar Deck, Platform Heritage		
<i>Device Description</i>	Emergency Use, Fuel: D2, lean/non-cyclic		

### 1.10 Survival Capsule #3

<i>Device ID #</i>	<b>103958</b>	<i>Device Name</i>	<b>Survival Capsule #3</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	30.00 Brake Horsepower
<i>Manufacturer</i>	Lister	<i>Operator ID</i>	ZZZ-509
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Cellar Deck, Platform Heritage		
<i>Device Description</i>	Emergency Use, Fuel: D2, lean/non-cyclic		

### 1.11 Cuttings Re-Injection Pump Engine

<i>Device ID #</i>	<b>386559</b>	<i>Device Name</i>	<b>Cuttings Re-Injection Pump Engine</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	450.00 Brake Horsepower
<i>Manufacturer</i>	Detroit Diesel	<i>Operator ID</i>	
<i>Model</i>	6063HV39	<i>Serial Number</i>	06R1051094
<i>Location Note</i>			
<i>Device Description</i>	Turbocharged, Tier III engine, Manufactured in 2012, diesel fired, same piece of equipment as Device IDs 386492 (ATC 14145) and 386558 (ATC 14146)		

## 2 External Combustion Sources

### 2.1 Central Process Heater

<i>Device ID #</i>	<b>005353</b>	<i>Device Name</i>	<b>Central Process Heater</b>
<i>Rated Heat Input</i>	27.200 MMBtu/Hour	<i>Physical Size</i>	238000.00 scf/Hour
<i>Manufacturer</i>	Tulsa	<i>Operator ID</i>	EAP-603
<i>Model</i>	JOHN ZINK AVC-SF-16S	<i>Serial Number</i>	107653-1
<i>Location Note</i>	Cellar Deck, Platform Heritage		
<i>Device Description</i>			

### 3 Storage Tanks

#### 3.1 Drilling Settling Tank

<i>Device ID #</i>	<b>005368</b>	<i>Device Name</i>	<b>Drilling Settling Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	7308.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	ABJ-417
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Production Deck, Platform Heritage		
<i>Device Description</i>	Separation, solids/water, atm vessel		

#### 3.2 Misc Tote Tanks

<i>Device ID #</i>	<b>102381</b>	<i>Device Name</i>	<b>Misc Tote Tanks</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	Tons of Solvent In Coating
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Drill Deck, Platform Heritage		
<i>Device Description</i>	Storage, misc chemicals, atm vessel		

#### 3.3 Emulsion Surge Tank

<i>Device ID #</i>	<b>107171</b>	<i>Device Name</i>	<b>Emulsion Surge Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Houston Steel	<i>Operator ID</i>	MBJ-110
<i>Model</i>		<i>Serial Number</i>	89-1-E-9593-ODA
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Diameter: 11, Length: 30 ft, connected to VRS		

### 4 Compressors

#### 4.1 STV Compressor

<i>Device ID #</i>	<b>103968</b>	<i>Device Name</i>	<b>STV Compressor</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	62.40 scf/Hour
<i>Manufacturer</i>	Cooper, Superior	<i>Operator ID</i>	CZZ-301, 302
<i>Model</i>	MW62	<i>Serial Number</i>	
<i>Location Note</i>	Production Deck, Platform Heritage		
<i>Device Description</i>			

## 4.2 Vent Recovery Compressor

<i>Device ID #</i>	<b>103966</b>	<i>Device Name</i>	<b>Vent Recovery Compressor</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	0.50 MMscf/Day
<i>Manufacturer</i>	A-C Comp Corp.	<i>Operator ID</i>	CZZ-309
<i>Model</i>	10GB	<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

## 4.3 Gas Injection Compressor

<i>Device ID #</i>	<b>103967</b>	<i>Device Name</i>	<b>Gas Injection Compressor</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	27.60 MMscf/Day
<i>Manufacturer</i>	Cooper, Superior	<i>Operator ID</i>	CZZ-310, 311
<i>Model</i>	W74	<i>Serial Number</i>	
<i>Location Note</i>	Cellar Deck, Platform Heritage		
<i>Device Description</i>			

## 4.4 Main Gas Compressor

<i>Device ID #</i>	<b>103969</b>	<i>Device Name</i>	<b>Main Gas Compressor</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1125.00 scf/Hour
<i>Manufacturer</i>	Cooper, Superior	<i>Operator ID</i>	CZZ-303, 304, 305
<i>Model</i>		<i>Serial Number</i>	313080, 313090
<i>Location Note</i>	Production Deck, Platform Heritage		
<i>Device Description</i>			

## 5 Pigging Equipment

### 5.1 Emulsion Pig Launcher

<i>Device ID #</i>	<b>102539</b>	<i>Device Name</i>	<b>Emulsion Pig Launcher</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	48.64 Cubic Feet
<i>Manufacturer</i>		<i>Operator ID</i>	KAH-791
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Cellar Deck, Platform Heritage		
<i>Device Description</i>	Heritage to Harmony		

## 5.2 Gas Pig Launcher

<i>Device ID #</i>	<b>102540</b>	<i>Device Name</i>	<b>Gas Pig Launcher</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	20.00 Cubic Feet
<i>Manufacturer</i>		<i>Operator ID</i>	KAH-793
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

## 6 Pressure Vessels

### 6.1 Hydrogen Sulfide Scrubber

<i>Device ID #</i>	<b>114588</b>	<i>Device Name</i>	<b>Hydrogen Sulfide Scrubber</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1.00 Installation
<i>Manufacturer</i>	Klean Air 55	<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Contains approximately 350 lbs of Sulfa Treat for removal of hydrogen sulfide.		

## 7 Flare Relief System

### 7.1 Flare: Purge and Pilot

<i>Device ID #</i>	<b>102382</b>	<i>Device Name</i>	<b>Flare: Purge and Pilot</b>
<i>Rated Heat Input</i>	0.570	<i>Physical Size</i>	445.00 scf/Hour
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

**7.2 Flare: Planned Continuous**

<i>Device ID #</i>	<b>102383</b>	<i>Device Name</i>	<b>Flare: Planned Continuous</b>
<i>Rated Heat Input</i>	0.780	<i>Physical Size</i>	607.00 scf/Hour
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

**7.3 Flare: Planned Other**

<i>Device ID #</i>	<b>102384</b>	<i>Device Name</i>	<b>Flare: Planned Other</b>
<i>Rated Heat Input</i>	3820.000	<i>Physical Size</i>	6.30 MMcf/yr
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

**7.4 Flare: Unplanned**

<i>Device ID #</i>	<b>102385</b>	<i>Device Name</i>	<b>Flare: Unplanned</b>
<i>Rated Heat Input</i>	3820.000	<i>Physical Size</i>	34.00 MMcf/yr
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

**8 Flare Scrubber Treatment System**

**8.1 Carbon Canister 1**

<i>Device ID #</i>	<b>114586</b>	<i>Device Name</i>	<b>Carbon Canister 1</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1.00 Installation
<i>Manufacturer</i>	Klean Air 55	<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Contains approximately 200 lbs activated carbon for removal of reactive organic compounds		

## 8.2 Carbon Canister 2

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<i>Device ID #</i>	<b>114587</b>	<i>Device Name</i>	<b>Carbon Canister 2</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1.00 Installation
<i>Manufacturer</i>	Klean Air 55	<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Contains approximately 200 lbs activated carbon for removal of reactive organic compounds		

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## 9 Fugitive HC Components - CLP - Oil Svc

### 9.1 Oil Valve/Connection - Accessible

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<i>Device ID #</i>	<b>102516</b>	<i>Device Name</i>	<b>Oil Valve/Connection - Accessible</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	11507.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	1109 clp f/c from the "flanges/connections oil" and 7352 clp from the "controlled oil" (DeviceNo 102522) were grouped as "flanges/connections - accessible/inaccessible" per the new naming convention in ATC 11131. 181 clp valves are included in this DeviceNo.		

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### 9.2 Oil Valve/Connection - Category B

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<i>Device ID #</i>	<b>102520</b>	<i>Device Name</i>	<b>Oil Valve/Connection - Category B</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	55.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Quarterly monitoring at 500 ppmv. 41 clp were moved from "E500 Oil" (DeviceNo 102523) to Category B per the new naming convention in ATC 11131.		

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### 9.3 Oil Valve/Connection - Category F

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<i>Device ID #</i>	<b>102517</b>	<i>Device Name</i>	<b>Oil Valve/Connection - Category F</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1345.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Quarterly monitoring at 100 ppmv. Added 125 clp for IP/LP project and 975 clp for HP project after final inventory in ATC 11132 Mod-01. 45 clp previously named "E100 Oil" (DeviceNo 102524) have been put in Category F per the new naming convention in ATC 11131.		

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### 9.4 Oil Pump Seals - Dual/Tandem

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<i>Device ID #</i>	<b>102518</b>	<i>Device Name</i>	<b>Oil Pump Seals - Dual/Tandem</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	6.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

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### 9.5 Oil Valve/Connection - Unsafe

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<i>Device ID #</i>	<b>104950</b>	<i>Device Name</i>	<b>Oil Valve/Connection - Unsafe</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	5.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	5 clp added per ATC 11132 Mod -01		

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## 10 Fugitive HC Components - CLP - Gas/Cond Svc

### 10.1 Gas Valve/Connection - Accessible

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<i>Device ID #</i>	<b>102526</b>	<i>Device Name</i>	<b>Gas Valve/Connection - Accessible</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	7679.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Combined gas flanges/connections - accessible (DeviceNo 102528) since OCS does not have a requirement to monitor these components separately. Added 7333 clp from the Controlled Gas (DeviceNo 102532) due to the "Category X" naming convention		

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### 10.2 Gas Valve/Connection - Category B

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<i>Device ID #</i>	<b>102527</b>	<i>Device Name</i>	<b>Gas Valve/Connection - Category B</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	6112.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Quarterly monitoring at 500 ppmv. Combined Category B gas flanges/connections (DeviceNo 102530). Added 5901 clp from the E500 Gas (DeviceNo 102534).		

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### 10.3 Gas Valve/Connection - Unsafe

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<i>Device ID #</i>	<b>102529</b>	<i>Device Name</i>	<b>Gas Valve/Connection - Unsafe</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	81.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Added 37 clp from the "Unsafe Gas" (DeviceNo 102533) due to the new "Category X" naming. Added 20 clp for IP/LP and 15 clp for HP after final inventory.		

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**10.4 Gas Valve/Connection - Category F**

<i>Device ID #</i>	<b>104943</b>	<i>Device Name</i>	<b>Gas Valve/Connection - Category F</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	3168.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Quarterly monitoring at 100 ppmv. 933 clp valves/connections for IP/LP added after final inventory A11132 Mod-01. 837 valves/connections added for HP after final inventory A11132 Mod-01. Incorporated 1377 clp from E100 gas (DeviceNo 102535) due to new "Category X" naming.		

**10.5 Gas Valve/Connection - Category C**

<i>Device ID #</i>	<b>104948</b>	<i>Device Name</i>	<b>Gas Valve/Connection - Category C</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	488.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	118 clp valves - accessible and 370 clp flanges/connections - accessible were reclassified as Category C per DOI 0039 and ATC 11132 Mod-01.		

**10.6 Fugitive HC Components - Valve CLP - Gas Svc. (Access.)**

<i>Device ID #</i>	<b>113973</b>	<i>Device Name</i>	<b>Fugitive HC Components - Valve CLP - Gas Svc. (Access.)</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	410.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

## 11 Sumps

### 11.1 Closed Drain Sump

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<i>Device ID #</i>	<b>005363</b>	<i>Device Name</i>	<b>Closed Drain Sump</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	90.00 Square Feet Sump Area
<i>Manufacturer</i>	Buffalo Tank	<i>Operator ID</i>	MBH-132
<i>Model</i>	BTC J-4453-B	<i>Serial Number</i>	
<i>Location Note</i>	Subcellar, Platform Heritage		
<i>Device Description</i>	Hydrocarbons, pressure vessel, VRS		

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### 11.2 Open Drain Sump

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<i>Device ID #</i>	<b>005364</b>	<i>Device Name</i>	<b>Open Drain Sump</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	90.00 Square Feet Sump Area
<i>Manufacturer</i>	Buffalo Tank	<i>Operator ID</i>	ABH-406
<i>Model</i>	BTC J-4446-B	<i>Serial Number</i>	
<i>Location Note</i>	Subcellar, Platform Heritage		
<i>Device Description</i>	Service fluids, atm vessel		

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### 11.3 Wellbay Drain Sump

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<i>Device ID #</i>	<b>005365</b>	<i>Device Name</i>	<b>Wellbay Drain Sump</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	90.00 Square Feet Sump Area
<i>Manufacturer</i>	Buffalo Tank	<i>Operator ID</i>	ABH-405
<i>Model</i>	BTC J-4445-B	<i>Serial Number</i>	
<i>Location Note</i>	Subcellar, Platform Heritage		
<i>Device Description</i>	Service fluids, atm vessel secondary		

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## 11.4 Amine Sump

<i>Device ID #</i>	<b>005366</b>	<i>Device Name</i>	<b>Amine Sump</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	42.00 Square Feet Sump Area
<i>Manufacturer</i>	General Welding Works	<i>Operator ID</i>	MBH-170
<i>Model</i>		<i>Serial Number</i>	17952
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Amine, pressure vessel, VRS		

## 11.5 Skim Pile

<i>Device ID #</i>	<b>005367</b>	<i>Device Name</i>	<b>Skim Pile</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	16.00 Square Feet Area
<i>Manufacturer</i>		<i>Operator ID</i>	ABH-416
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Jacket walkway, Platform Heritage		
<i>Device Description</i>	Service fluids, atm vessel tertiary		

## 12 Supply Boat

### 12.1 Supply Boat: Main Engines

<i>Device ID #</i>	<b>005357</b>	<i>Device Name</i>	<b>Supply Boat: Main Engines</b>
<i>Rated Heat Input</i>	30.400 MMBtu/Hour	<i>Physical Size</i>	4000.00 Brake Horsepower
<i>Manufacturer</i>	Caterpillar	<i>Operator ID</i>	M/V Santa Cruz
<i>Model</i>	3516 B	<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Fuel: D2 Load: 0.65		

## 12.2 Supply Boat: Generator Engines

<i>Device ID #</i>	<b>005358</b>	<i>Device Name</i>	<b>Supply Boat: Generator Engines</b>
<i>Rated Heat Input</i>	3.720	<i>Physical Size</i>	490.00 Brake Horsepower
<i>Manufacturer Model</i>	Caterpillar D3406DT; D3306DIT	<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Fuel: D2 Load: 0.50		

## 12.3 Supply Boat: Bow Thruster Engines

<i>Device ID #</i>	<b>005359</b>	<i>Device Name</i>	<b>Supply Boat: Bow Thruster Engines</b>
<i>Rated Heat Input</i>	3.800	<i>Physical Size</i>	500.00 Brake Horsepower
<i>Manufacturer Model</i>	Caterpillar 3408C DITA	<i>Operator ID Serial Number</i>	M/V Santa Cruz
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Fuel: D2 Load: 1.00		

## 13 Crew Boat

### 13.1 Crew Boat: Main Engines

<i>Device ID #</i>	<b>005361</b>	<i>Device Name</i>	<b>Crew Boat: Main Engines</b>
<i>Rated Heat Input</i>	29.340 MMBtu/Hour	<i>Physical Size</i>	3860.00 Brake Horsepower
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Fuel: D2 Load: 0.85		

### 13.2 Crew Boat: Auxiliary Engines

<i>Device ID #</i>	<b>005362</b>	<i>Device Name</i>	<b>Crew Boat: Auxiliary Engines</b>
<i>Rated Heat Input</i>	1.990 MMBtu/Hour	<i>Physical Size</i>	262.00 Brake Horsepower
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Fuel: D2, Load: 0.50		

### 13.3 M/V Broadbill - Main Engines

<i>Device ID #</i>	<b>107900</b>	<i>Device Name</i>	<b>M/V Broadbill - Main Engines</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	600.00 Brake Horsepower
<i>Manufacturer Model</i>	Detroit Diesel Series 60	<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Two new Tier II Detroit Diesel Series 60 propulsion engines (each rated at 600 bhp), and two new Tier II Northern Lights Model M40C2 auxiliary engines (each rated at 60 bhp).		

### 13.4 M/V Broadbill - Auxiliary Engines

<i>Device ID #</i>	<b>107901</b>	<i>Device Name</i>	<b>M/V Broadbill - Auxiliary Engines</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	60.00 Brake Horsepower
<i>Manufacturer Model</i>	Northern Lights M40C2	<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

## 14 Maintenance Activities

### 14.1 Solvent Usage: Cleaning/Degreasing

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<i>Device ID #</i>	<b>005369</b>	<i>Device Name</i>	<b>Solvent Usage: Cleaning/Degreasing</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Sigma 9188, Sigma 5002		

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### 14.2 Solvent Usage: Maintenance

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<i>Device ID #</i>	<b>005373</b>	<i>Device Name</i>	<b>Solvent Usage: Maintenance</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

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## 15 Spot Charter: Main Engine

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<i>Device ID #</i>	<b>104959</b>	<i>Device Name</i>	<b>Spot Charter: Main Engine</b>
<i>Rated Heat Input</i>	30.400 MMBtu/Hour	<i>Physical Size</i>	4000.00 Brake Horsepower
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Load: 0.65, 0.20 % S by weight, fuel D2. Assumed to be an uncontrolled engine of the same size as the Supply Boat Main Engine, but may be a controlled engine.		

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**16 Spot Charter: Main Engine**

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<i>Device ID #</i>	<b>104960</b>	<i>Device Name</i>	<b>Spot Charter: Main Engine</b>
<i>Rated Heat Input</i>	29.340 MMBtu/Hour	<i>Physical Size</i>	3860.00 Brake Horsepower
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Assumed to be an uncontrolled engine of the same size as the Crew Boat Main Engine, but may be a controlled engine.		

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**17 Winch - Uncontrolled**

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<i>Device ID #</i>	<b>104962</b>	<i>Device Name</i>	<b>Winch - Uncontrolled</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	409.00 Brake Horsepower
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	M/V Santa Cruz
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

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**B EXEMPT EQUIPMENT**

**1 Cellar Deck Heat Exchangers**

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<i>Device ID #</i>	<b>107690</b>	<i>Device Name</i>	<b>Cellar Deck Heat Exchangers</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i>	
		202.L.1 Heat Exchangers	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Amine Heating Oil, Amine Reboiler, Amine Reflux Condenser, Depropanizer Bottoms Cooler, Depropanizer Reboiler, Glycol Reflux Condenser, Glycol Still Overhead Condenser, Jacket Water Startup, Lean Amine Cooler, Rich/Lean Amine Exchanger, Rich/Lean Glycol Exchanger		

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**2 Diesel Storage Tank**

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<i>Device ID #</i>	<b>102537</b>	<i>Device Name</i>	<b>Diesel Storage Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	17220.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	ABJ-401
<i>Model</i>		<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i>	
		202.V.2 Storage Of Refined Fuel Oil W/Grav <=40 Api	
<i>Location Note</i>	Production Deck, Drawing X-60, Platform Heritage		
<i>Device Description</i>	atm vessel,		

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**3 Refrigerant Compressors**

<i>Device ID #</i>	<b>102543</b>	<i>Device Name</i>	<b>Refrigerant Compressors</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	800.00 Brake Horsepower
<i>Manufacturer</i>	Mycorn	<i>Operator ID</i>	CZZ-328, 329
<i>Model</i>	320 MVD HE R22	<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i> 201.A No Potential To Emit Air Contaminants	
<i>Location Note</i>	Cellar Deck, PID X71, Platform Heritage		
<i>Device Description</i>	Freon vapor service		

**4 Remote Reservoir Cold Solvent Cleaner**

<i>Device ID #</i>	<b>108169</b>	<i>Device Name</i>	<b>Remote Reservoir Cold Solvent Cleaner</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i> 202.V.1 Unheat Storage Of Lqd Org Mtls W/Bp >=300 @ 1 Atm	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

**5 Fugitive Hydrocarbon Components Gas - Exempt**

<i>Device ID #</i>	<b>102536</b>	<i>Device Name</i>	<b>Fugitive Hydrocarbon Components Gas - Exempt</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	25.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i> 201.A No Potential To Emit Air Contaminants	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

**6 Anti-Foam Tank**

<i>Device ID #</i>	<b>102541</b>	<i>Device Name</i>	<b>Anti-Foam Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	500.00 Gallons
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	ABJ-415
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i> 201.A No Potential To Emit Air Contaminants	
<i>Location Note</i>	Production Deck, Platform Heritage		
<i>Device Description</i>	Surflo 8577, atm vessel		

**7 STV Compressor Lube Tank**

<i>Device ID #</i>	<b>102542</b>	<i>Device Name</i>	<b>STV Compressor Lube Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	250.00 Gallons
<i>Manufacturer Model</i>	Buffalo Tank BTC J-4449-B	<i>Operator ID Serial Number</i>	ABJ-424
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i> 202.V.3 Storage Of Lubricating Oils	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	atm vessel		

**8 Main Gas Compressor Lube Tank**

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<i>Device ID #</i>	<b>103963</b>	<i>Device Name</i>	<b>Main Gas Compressor Lube Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	250.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	ABJ-427
<i>Model</i>		<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i> 202.V.3 Storage Of Lubricating Oils	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	atm vessel		

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**9 Fugitive Hydrocarbon Components Oil - Exempt**

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<i>Device ID #</i>	<b>102525</b>	<i>Device Name</i>	<b>Fugitive Hydrocarbon Components Oil - Exempt</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	20.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i> 201.A No Potential To Emit Air Contaminants	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>			

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**10 Injection Compressor Lube Tank**

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<i>Device ID #</i>	<b>103964</b>	<i>Device Name</i>	<b>Injection Compressor Lube Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	250.00 Gallons
<i>Manufacturer</i>	Buffalo Tank	<i>Operator ID</i>	ABJ-421
<i>Model</i>	BTC J-4448-B	<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i> 202.V.3 Storage Of Lubricating Oils	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	atm vessel		

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**11 IC Engines: Temporary (Diesel)**

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<i>Device ID #</i>	<b>005738</b>	<i>Device Name</i>	<b>IC Engines: Temporary (Diesel)</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	180.00 Brake Horsepower
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i>	
<i>Location Note</i>	Platform Heritage	202.D.5 Temporary Equipment	
<i>Device Description</i>			

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**12 Helicopters**

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<i>Device ID #</i>	<b>005563</b>	<i>Device Name</i>	<b>Helicopters</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Twinstar	<i>Operator ID</i>	
<i>Model</i>	AS-355-F-F1	<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i>	
<i>Location Note</i>	Platform Heritage	202.F.1.a. Aircraft & Locomotive Engines	
<i>Device Description</i>			

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**13 Abrasive Blasting**

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<i>Device ID #</i>	<b>005877</b>	<i>Device Name</i>	<b>Abrasive Blasting</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i>	
<i>Location Note</i>	Platform Heritage	202.H.3 Portable Abrasive Blast Equipment	
<i>Device Description</i>			

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**14 Cellar Mezzanine Heat Exchangers**

<i>Device ID #</i>	<b>107691</b>	<i>Device Name</i>	<b>Cellar Mezzanine Heat Exchangers</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i> 202.L.1 Heat Exchangers	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Glycol Cooler, Depropanizer Condenser,(2) First Stage Suction Coolers, Glycol Exchanger, Glycol Reboiler, (2) Injection Gas Coolers, Refrigerant Condenser, (3) Seawater Exchangers		

**15 Production Deck Heat Exchangers**

<i>Device ID #</i>	<b>107692</b>	<i>Device Name</i>	<b>Production Deck Heat Exchangers</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i> 202.L.1 Heat Exchangers	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	(2) First Stage Discharge Coolers, Fuel Gas Heater, (2) Gas/Gas Exchangers, Monterey Production Heater, (2) Second Stage Discharge Coolers		

**16 STV Compressor Suction Coolers**

<i>Device ID #</i>	<b>107693</b>	<i>Device Name</i>	<b>STV Compressor Suction Coolers</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Omhstade	<i>Operator ID</i>	HBG-219, -220
<i>Model</i>		<i>Serial Number</i>	58410, 58412
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i> 202.L.1 Heat Exchangers	
<i>Location Note</i>	Production Mezzanine Heat Exchangers, Platform Heritage		
<i>Device Description</i>	Production Mezzanine Heat Exchangers, gas service, heat medium: cooling water		

**17 Production Mezzanine BX Heat Exchangers**

<i>Device ID #</i>	<b>107694</b>	<i>Device Name</i>	<b>Production Mezzanine BX Heat Exchangers</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Ohmstade, Heat Transfer	<i>Operator ID</i>	HBG-231, -234
<i>Model</i>		<i>Serial Number</i>	58413, 11428
<i>Part 70 Insig?</i>	No	<i>District Rule Exemption:</i> 202.L.1 Heat Exchangers	
<i>Location Note</i>	Platform Heritage		
<i>Device Description</i>	Fuel Gas Cooler (Hbg-231), Shell and Tube Fuel Gas Startup Heater (Hbg-234), Process		



#### ***10.4. Permittee Comments on the Draft permit and District Responses***

Draft comments will appear in the final permit.