

TO: Interested Parties

DATE: May 30, 2008

RE: Notice of Intent to Adopt a Mitigated Negative Declaration for the ExxonMobil Santa Ynez Unit Cable C1 Repair Project (APCD Permit to Operate Modification No. 9102-04)

Pursuant to the California Environmental Quality Act (CEQA), the Santa Barbara County Air Pollution Control District (APCD), as the lead agency, has released for review and comment a Proposed Mitigated Negative Declaration (MND) for the ExxonMobil Santa Ynez Unit C1 Cable Repair Project (APCD Permit to Operate Modification No. 9102-04). The project is located southeast of Platform Heritage on the Outer Continental Shelf (OCS) waters within 25 miles of the seaward boundary of the State and located off the south coast of the County. The federal lead agency for this project is the U.S. Minerals Management Service. The APCD is the only local agency with permit jurisdiction over this project.

PROJECT DESCRIPTION and LOCATION: ExxonMobil Production Company proposes to use a cable repair vessel to repair a fault in power Cable C1, located approximately 2,750 feet southeast of the Platform Heritage in about 1,125 feet of water depth. The repair activities will be conducted 24 hours/day from the cable repair vessel which will be positioned above the cable fault area over a period of 25 days in the latter part of 2008 or early 2009. In order to minimize air emissions, as part of the project, ExxonMobil has committed to implementing several measures such as, minimizing use of the vessel engines, preparing an Emissions Reporting Plan, Emissions Daily Report and requiring the repair vessel and other associated internal combustion engines to use fuel with less than 0.0015% sulfur by weight when operating in Santa Barbara County.

Limits of APCD Environmental Review for Projects Located on the OCS: When the APCD is the CEQA Lead Agency for the issuance of a discretionary permit for an OCS project, as authorized by Section 328 of the federal Clean Air Act, the APCD, "may limit the CEQA analysis to air quality issues if the Air Pollution Control Officer finds that the analysis of other issue areas is not *rationaly related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act." Accordingly this Mitigated Negative Declaration only addresses the impact of the proposed project on air quality.

APCD Permit to Operate Modification No. 9102-04 will permit a maximum of 10 tons total of oxides of nitrogen (NOx) from the cable repair vessel engines for this project. As described in a Mitigation Agreement, ExxonMobil will be required to provide \$14,300 per ton for the 10 tons of permitted NOx emissions associated with the repair of failed Cable C1. The APCD has determined that potentially significant air quality impacts associated with the project will be mitigated to a level of insignificance and the project does not require the preparation of an Environmental Impact Report. Therefore, the APCD has issued a Proposed Mitigated Negative Declaration.

Copies of the Initial Study/Proposed Mitigated Negative Declaration for the ExxonMobil SYU C1 Cable Repair Project may be obtained by calling our offices at (805) 961-8811 or from the APCD's web site, www.sbcapcd.org/notices.htm. The 30-day public comment period for the proposed MND begins on June 2, 2008. Please limit your comments to environmental issues only. Written comments should be sent to Vijaya Jammalamadaka, Technology and Environmental Assessment Division, Santa Barbara County APCD, 260 N. San Antonio Road, Santa Barbara, CA 93110, or vlj@sbcapcd.org before the **close of the public review period at 5:00 p.m. on July 1, 2008.**



**PROPOSED
MITIGATED NEGATIVE DECLARATION**

for

**ExxonMobil Santa Ynez Unit C1 Cable Repair Activity
Permit to Operate Modification No. 9102-04**

**RELEASE DATE: June 2, 2008
CLOSE OF PUBLIC REVIEW PERIOD: 5PM, July 1, 2008**

**Prepared by
Technology and Environmental Assessment Division
Santa Barbara County Air Pollution Control District
260 N. San Antonio Road, Suite A
Santa Barbara, CA 93110-1315**



260 N. San Antonio Road, Suite A
Santa Barbara, CA 93110-1315

INITIAL STUDY

PROJECT NAME: ExxonMobil Santa Ynez Unit C1 Cable Repair Activity

APCD Permit Number: Permit to Operate Modification No. 9102-04

PROJECT LOCATION: Southeast of Platform Heritage on the Outer Continental Shelf, Santa Barbara Channel, southern Santa Barbara County.

PROJECT APPLICANTS' NAME AND ADDRESS: Frank C. Betts, Santa Ynez Unit Operations Supervisor, ExxonMobil Production, P.O. Box 4358, Houston, TX 77210-4358

LEAD AGENCY CONTACT PERSON INFORMATION:

Name: Phil Sheehan,
Title: Air Quality Engineer, Engineering & Compliance Division
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LEAD AGENCY CEQA CONTACT: Bobbie Bratz, SBCAPCD Environmental Officer

Introduction:

ExxonMobil Production Company ("ExxonMobil") is the principal owner and operator of the Santa Ynez Unit ("SYU") Project, which includes Platforms Hondo, Harmony and Heritage, the Las Flores Canyon Oil and Gas Plant ("LFC") and the Pacific Offshore Pipeline company gas plant ("POPCO"). The three platforms are located in Outer Continental Shelf ("OCS") waters on the following lease tracts: OCS P-0188 (Hondo), OCS P-0190 (Harmony), and OCS P-0182 (Heritage), and are from 20 to 30 miles west of the city of Santa Barbara. The LFC and POPCO are located approximately 20 miles west of the city of Santa Barbara.

The platforms produce sour natural gas and crude oil. Primary separation of the oil emulsion from the produced gas takes place at the platforms. Produced gas which is separated from the

oil emulsion is compressed and used as fuel gas (after sweetening), re-injected or sent to LFC for further processing. Gas from Platform Heritage has been primarily re-injected into wells at that platform. There is a subsea gas pipeline connecting platforms Heritage and Harmony. At all three platforms, emulsion and any produced gas entrained in the emulsion are sent via subsea pipeline to Exxon's LFC processing facilities.

The electrical power required to operate the platforms is provided via undersea power cables and supplied by the cogeneration facility at LFC with backup, as needed, provided by the Southern California Edison grid. A previous ExxonMobil Offshore Power Cable Repair and Enhancement Project was completed in March, 2004. The project involved replacing a failed power cable (Cable C) from onshore to Platform Heritage that comprises part of ExxonMobil's offshore electrical power system, installing a new cable (power Cable C1) between Platforms Hondo and Harmony and updating the communications system from microwave to a fiber optics system. Power Cable C1 supplies electricity from LFC to Platform Heritage, a distance of about 17 miles. In November 2007, a cable insulation failure occurred in one of the three phases in Cable C1. Currently power is being supplied to Platform Heritage through the approximately 7-mile long Cable E from Platform Harmony.

Previous Environmental Review: The following documents provide discussion of air quality impacts associated with SYU Project activities. The references are organized in chronological order from the original SYU Project through the subsequent SYU Project modifications and may be referenced for additional information. Various Authority to Construct (ATC) permits and Permits to Operate (PTO) have been issued by the SBCAPCD regarding SYU modifications and operations. These permits are regulatory authorizations and they have not been incorporated in this chronology and further information may be obtained by contacting SBCAPCD offices.

Original SYU DPP -- Exxon, 1982. Details on the original SYU Development and Production Plan (DPP) are discussed in Exxon (1982a). The Environmental Report (Exxon 1982b) submitted at the same time as the DPP performed an analysis of air quality as required by MMS regulations.

An Environmental Impact Statement/Report (EIS/R) (SAI, 1984a) was prepared to evaluate the effects of the DPP and potential alternatives. An air quality analysis on the proposed OCS development and potential alternatives was also prepared (SAI, 1984b).

SYU DPP Project Modifications -- Exxon, 1985. The modifications proposed for the SYU Project in 1985 are discussed in Exxon (1985). The only modification that had any effect on air quality was the proposed moving of the Single Anchor Leg Mooring (SALM) from 5,000 feet (1,520 meters) to 14,000 feet (4,300 meters) offshore.

SYU DPP Project Modifications -- Exxon, 1987. On June 10, 1987, Exxon applied to the SBCAPCD for an ATC permit. The application was based on a Final Development Plan resulting from negotiations between Exxon and Santa Barbara County. The modifications to the project schedule reduced the estimate of peak air emissions due to construction activities.

The Supplemental EIR (ADL, 1986), concluded that project emissions of the precursor pollutants, NO_x and ROC, could result in significant increases in ozone. These potential impacts were addressed through Exxon's commitment of appropriate NO_x and ROC offsets.

An EA (MMS, 1988) was prepared on the 1987 modifications to the approved 1985 DPP. The EA noted the finding in the 1987 ATC 5651 (SBCAPCD, 1987) of a net air quality benefit for Santa Barbara County as a result of modifications to the DPP and that the effects of the DPP modification on onshore air quality would be insignificant.

SYU DPP Project Emissions Revision -- Exxon, 1991. Changes in the proposed equipment (primarily marine vessels and barges) and schedule for construction of the platforms prompted a review by the County of all the construction activities planned for the OCS region.

An EA (MMS, 1991) was prepared to analyze the proposed modifications to the SYU pipeline and power cable development activities in the revised DPP. The EA noted that through the use of emission offsets and mitigation measures, the project would result in a net air quality benefit to the county and would not have significant effects on air quality.

SYU OS&T Abandonment EA -- MMS, 1994. An EA (MMS, 1994) was prepared to assess the environmental impacts associated with the abandonment and removal of Exxon's Offshore and Storage Treatment Vessel (OS&T). The EA concluded that through Exxon's commitment of NO_x and ROC offsets and specific mitigation measures, the project would result in a net air quality benefit to the county and that environmental effects concerning air quality were considered insignificant.

3-D Seismic Survey EA -- MMS, 1995. An EA (MMS, 1995) was developed to assess the environmental impacts associated with conducting a 3-D seismic survey on the SYU Unit. The EA concluded that through Exxon's commitment of NO_x and ROC contemporaneous offsets and specific conditions of compliance with ATC permit 9429, the project would result in a net air quality benefit to the county and that environmental effects concerning air quality were considered insignificant.

Platform Heritage to Platform Harmony Pipeline Project EA -- MMS, 1997. An EA (MMS, 1997) was developed to assess and evaluate the environmental impacts associated with the installation of an approximate 7-mile gas pipeline between Platforms Heritage and Harmony. The EA concluded that the proposed project would be monitored to ensure that the project fall below emission thresholds of 25 tons per year of any affected pollutant set for equipment used in pipe-laying operations as provided in SBCAPCD Rule 201.D.2. Emissions from the operational phase of the project were fully offset to result in a net air quality benefit to Santa Barbara County. Therefore, environmental effects to Santa Barbara County air quality from the proposed project were considered insignificant.

ExxonMobil Offshore Power System Repair Project—MND/EA. In 2003, the County Energy Division and MMS, as the lead agency under CEQA and NEPA respectively, prepared and approved a Mitigated Negative Declaration/Environmental Assessment for the ExxonMobil

Power Cable C1 project which was installed to replace the failed power Cable C, to supply electricity from LFC to Platform Heritage. The APCD relied on this document to issue the ATC/PTO/Part 70 10927 permit for the cable removal portion of the project. The project installation was considered to be a construction project and was therefore exempt from APCD permits. Air quality mitigation measures included limitations on the total project emissions, fuel use and emissions calculations, fuel sulfur content limitations and fugitive dust control measures. ExxonMobil was also required to contribute financial support to the APCD's Innovative Technology Fund to compensate for emissions increases.

Proposed Project Description: The project under review is described in detail in the SBCAPCD's Permit to Operate Modification No. 9102-04. This permit and application for this project are incorporated herein by reference. The project description is summarized below.

ExxonMobil proposes to use a cable repair vessel to repair the fault, in power Cable C1, located approximately 2,750 feet southeast of the Platform Heritage power cable J-tube bell mouth in about 1,125 feet of water depth. The repair activities will be conducted 24 hours/day from a cable repair vessel which will be positioned above the fault area over a period of 25 days in the latter part of 2008 or early 2009. In order to minimize air emissions, as part of the project, ExxonMobil has committed to implement several measures such as, minimizing use of the vessel engines, preparing an Emissions Reporting Plan, Emissions Daily Report and requiring the repair vessel and other associated IC engines to use fuel with less than 0.0015% sulfur by weight when operating in Santa Barbara County.

Environmental Setting: Geographically, the project operations will be conducted in the Santa Barbara Channel on the OCS, adjacent to Platform Heritage in the Santa Ynez Unit. The 2007 Clean Air Plan, which was prepared to meet the State Clean Air Act requirements and the accompanying Supplemental EIR (APCD-2007-SEIR-01, SCH # 1991031045) describe the existing Santa Barbara County environment setting and is incorporated herein by reference and is updated and summarized below.

Santa Barbara County currently meets the federal ambient air quality standards for all criteria pollutants but does not meet the more stringent State ambient air quality standards for 8-hour ozone, and for particulate matter.

The Santa Barbara County emission inventory encompasses all onshore sources of air pollution within Santa Barbara County and the State Tidelands. The largest contributor to our locally generated air pollution is on-road mobile sources (cars and trucks), which contribute 40 percent of the reactive organic compounds and 55 percent of the emissions of oxides of nitrogen. Other mobile sources (planes, trains, boats), the evaporation of solvents, combustion of fossil fuels, surface cleaning and coating, and petroleum production and marketing combine to make up the remainder.

Other Public Agencies Whose Approval is Required: The SBCAPCD is the only agency with permit authority over this ExxonMobil Cable Repair project located on the OCS. The US

Minerals Management Service has approval authority and will be issuing a *Letter of Concurrence*. The US EPA has a 45-day period, starting May 15, 2008, for review and comment; Coast Guard and the CA State Lands Commission will also be informed.

Limits of SBCAPCD's Environmental Review for Projects Located on the OCS: When the APCD is the CEQA Lead Agency for the issuance of a discretionary permit for an OCS project as authorized by Section 328 of the federal Clean Air Act, the APCD, "may limit the CEQA analysis to air quality issues if the Air Pollution Control Officer finds that the analysis of other issue areas is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act."^a Accordingly this Mitigated Negative Declaration only addresses the impact of the proposed project on air quality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Hazards/Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning |
| <input type="checkbox"/> Mineral Resources/Energy | <input type="checkbox"/> Noise/Nuisance | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance | |

DETERMINATION:

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by, or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

^a William M. Dillon, Deputy County Counsel, County of Santa Barbara, *Memorandum regarding Applicability of CEQA to OCS Projects*, October 18, 1995

- 2) *All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.*
- 3) *Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.*
- 4) *"Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, or "Earlier Analyses" may be cross-referenced).*
- 5) *Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:*
 - a) *Earlier Analysis Used. Identify and state where they are available for review.*
 - b) *Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on earlier analysis.*
 - c) *Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated", describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.*
- 6) *Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.*
- 7) *Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.*
- 8) *This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.*
- 9) *The explanation of each issue should identify:*
 - a) *the significance criteria or threshold, if any, used to evaluate each question; and*
 - b) *the mitigation measure identified, if any, to reduce the impact to less than significance.*

| | Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--|--------------------------------|---------------------------------------|--------------------------|-------------------------------------|
| I. AESTHETICS -- Would the project: | | | | |
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Discussion: The Air Pollution Control Officer finds that the analysis of this issue area is not *rationaly related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|---|--------------------------------|---------------------------------------|--------------------------|-------------------------------------|
| II. AGRICULTURE RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project: | | | | |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--|--------------------------------|---------------------------------------|--------------------------|-------------------------------------|
| c) Reduce the viability of property for agricultural use (e.g., due to reduced parcel size, restricted agricultural practices, etc.) or otherwise involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Discussion: The Air Pollution Control Officer finds that the analysis of this issue area is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Impact |
|---|--------------------------------|---------------------------------------|--------------------------|-------------------------------------|
| <u>III. AIR QUALITY</u> – The significance criteria established by the <i>Santa Barbara County Air Pollution Control District</i> or more stringent thresholds adopted by the Lead Agency may be relied upon to make the following determinations. Would the project: | | | | |
| a) Conflict with, or obstruct implementation of, the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Violate any air quality standard or contribute <u>substantially</u> ((including releasing emissions which exceed <i>project-specific</i> quantitative thresholds for ozone precursors) to an existing or projected air quality violation? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed <i>cumulative</i> quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Create or contribute to a non-stationary source “hot spot” (primarily carbon monoxide)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Impact |
|--|--------------------------------|---------------------------------------|--------------------------|-------------------------------------|
| e) Expose sensitive receptors to <u>substantial</u> toxic or hazardous air pollutant concentrations (including releasing emissions which exceed <i>adopted exposure</i> thresholds)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Subject a substantial number of people to objectionable odors? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Result in greenhouse gas emissions that would hinder or delay the State's ability to meet the reduction targets contained in AB 32 or the requirements of any other statute or regulation that becomes enforceable in California? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Adopted Significance Criteria or thresholds: A proposed project will not have a significant air quality effect on the environment, if operation of the project will:

- emit (from all project sources, both stationary and mobile) less than the daily trigger for offsets or Air Quality Impact Analysis set in the APCD New Source Review Rule², for any pollutant (*i.e.*, 240 pounds/day for ROC and NO_x; and 80 lbs/day for PM₁₀. There is no daily operational threshold for CO and SO_x; they are attainment pollutants); and
- emit less than 25 pounds per day of NO_x or ROC from motor vehicle trips only; and
- not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone); and
- not exceed the APCD significant health risk thresholds adopted by the APCD Board of Directors; and
- be consistent with the adopted federal and state air quality plans for Santa Barbara County.

Impact Discussion: The cable repair project data and emissions from the project are quantified in Table 1 of the draft permit document which is summarized in **Attachment A (Project Daily Emissions)**. Under a worst case emissions scenario, the boats associated with the proposed project will be permitted to emit up to 2,078.99 lbs/day of NOX and 103.64 lbs/day of ROC.

² The APCD New Source Review Rule as it existed at the time the APCD Environmental Review Guidelines were adopted (in October, 1995).

This includes emissions from the supply boat, the cable repair boat, and auxiliary engines used for the cables and winches that are exempt from APCD permit. The total actual emissions are above the APCD's thresholds of significance of 240 lbs/day (for NOx or ROG) by approximately 1,839 lbs/day of NOx. A maximum of 10 tons total of NOx will be permitted from the cable repair vessel engines for this project. Based on the calculations provided in the draft ATC permit document for this project, daily or annual emissions will not exceed project-specific quantitative emissions thresholds of significance for any other criteria pollutant. An Air Quality Impact Assessment (AQIA) was performed which included modeling using the OCD model. Modeling results indicate that the maximum impacts of source emissions are less than the APCD's Rule 803 increments. With the exception of 24-hour PM10 the total concentrations are less than applicable State and Federal ambient air quality standards. Since the proposed activities' contribution to the total 24-hour PM10 concentration is small, and the total concentration is well below the Federal standard, this is not considered a significant impact.

ExxonMobil will be required to provide \$14,300 per ton of permitted emissions to fully mitigate the NOx emissions associated with the repair of failed Cable C1. The permitted limit is 10 tons for this project and all 10 tons of NOx will be mitigated (**see Attachment B, Air Quality Mitigation Agreement**). Residual impacts will be insignificant and cumulative emissions are also considered insignificant.

There are no sensitive receptors or substantial numbers of people near the project location; therefore, public health risk is insignificant.

Consistency with the Clean Air Plan: This project complies with all adopted APCD rules and regulations and will incorporate the conditions of approval provided in the permit. In addition, all emissions (i.e., 10 tons of NOx) will be mitigated to zero as set forth in the *Air Quality Mitigation Agreement*. The 2007 CAP applies to this OCS project and the project does not obstruct the implementation of the Clean Air Plan.

Mitigation and Residual Impact: All standard and project-specific conditions are detailed in the Permit to Operate Modification No. 9102-04 document which is attached as Attachment C. This includes the requirement to fully mitigate all 10 tons of permitted emissions to zero, as set forth in the *Air Quality Mitigation Agreement* (Attachment B). The APCD will enforce the project description and all the conditions documented in the APCD permit for this ExxonMobil Cable Repair Project. No additional mitigation is required and residual impacts will be insignificant.

| | | | |
|--------------------------------|---------------------------------------|-----------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------|---------------------------------------|-----------------------|------------|

IV. BIOLOGICAL RESOURCES – Would the project:

a) Have an adverse impact, either directly or through

| | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

| | Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--|--------------------------------|---------------------------------------|--------------------------|-------------------------------------|
| habitat modifications, any endangered, rare, or threatened species, as listed in Title 14 of the California Code of Regulations (sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (sections 17.11 or 17.12)? | | | | |
| b) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Discussion: The Air Pollution Control Officer finds that the analysis of this issue area is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | | | |
|--------------------------------|---------------------------------------|-----------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------|---------------------------------------|-----------------------|------------|

V. CULTURAL RESOURCES – Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of unique archaeological resources (i.e., an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it contains information needed to answer important scientific research questions, has a special and particular quality such as being the oldest or best available example of its type, or is directly associated with a scientifically recognized important prehistoric or historic event or person)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Discussion: The Air Pollution Control Officer finds that the analysis of this issue area is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | | | |
|--------------------------------|---------------------------------------|-----------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------|---------------------------------------|-----------------------|------------|

VI. GEOLOGY AND SOILS – Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

| | Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|---|--------------------------------|---------------------------------------|--------------------------|-------------------------------------|
| 1 | | | | |
| i) Rupture of <i>or proximity to</i> a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Be located on strata or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Discussion: The Air Pollution Control Officer finds that the analysis of other issue areas is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | | | |
|--------------------------------------|--|--------------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------------|--|--------------------------|------------|

VII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | | | |
|--------------------------------------|--|--------------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
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wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Impact Discussion: No hazardous materials will be used in this project. The Air Pollution Control Officer finds that the analysis of this issue area is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | | | |
|--------------------------------------|--|--------------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------------|--|--------------------------|------------|

VIII. HYDROLOGY AND WATER QUALITY – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--|--------------------------------|---------------------------------------|--------------------------|-------------------------------------|
| f) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i) Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Discussion: The Air Pollution Control Officer finds that the analysis of this issue area is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|---|--------------------------------|---------------------------------------|--------------------------|-------------------------------------|
| IX. LAND USE AND PLANNING – Would the project: | | | | |
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with any applicable habitat conservation plan or natural communities conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Discussion: The proposed project will not result in any change in existing land use. The Air Pollution Control Officer finds that the analysis of this issue area is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | | | |
|--------------------------------------|--|--------------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------------|--|--------------------------|------------|

X. MINERAL RESOURCES – Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource classified MRZ-2 by the State Geologist that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Discussion: The Air Pollution Control Officer finds that the analysis of this issue area is not *rationaly related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | | | |
|--------------------------------------|--|--------------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------------|--|--------------------------|------------|

XI. NOISE – Would the project result in:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | | | |
|--------------------------------|---------------------------------------|-----------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------|---------------------------------------|-----------------------|------------|

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

| | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Impact Discussion: The Air Pollution Control Officer finds that the analysis of this issue area is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | | | |
|--------------------------------|---------------------------------------|-----------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------|---------------------------------------|-----------------------|------------|

XII. POPULATION AND HOUSING – Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

| | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

| | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

| | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Impact Discussion: The Air Pollution Control Officer finds that the analysis of this issue area is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | | | |
|--------------------------------|---------------------------------------|-----------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------|---------------------------------------|-----------------------|------------|

XIII. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically

| | Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--|--------------------------------|---------------------------------------|-----------------------|------------|
|--|--------------------------------|---------------------------------------|-----------------------|------------|

altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

| | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Discussion: The Air Pollution Control Officer finds that the analysis of this issue area is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--|--------------------------------|---------------------------------------|-----------------------|------------|
|--|--------------------------------|---------------------------------------|-----------------------|------------|

XIV. RECREATION --

| | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Discussion: The Air Pollution Control Officer finds that the analysis of this issue area is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | | | |
|--------------------------------|---------------------------------------|-----------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------|---------------------------------------|-----------------------|------------|

XV. TRANSPORTATION/TRAFFIC – Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Exceed, either individually or cumulatively, as level of service standard established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Result in a change in traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Substantially increase hazards <i>due</i> to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Result in inadequate parking capacity? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Conflict with adopted policies supporting alternative transportation modes (e.g., bus turnouts, bicycle racks)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Discussion: The Air Pollution Control Officer finds that the analysis of this issue area is not *rationally related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | | | |
|--------------------------------|---------------------------------------|-----------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------|---------------------------------------|-----------------------|------------|

| | | | |
|--------------------------------------|--|--------------------------|------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | No Finding |
|--------------------------------------|--|--------------------------|------------|

XVI. UTILITIES AND SERVICE SYSTEMS – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Are sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Has the wastewater treatment provider which serves or may serve the project determined that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Is the project served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Impact Discussion: The Air Pollution Control Officer finds that the analysis of this issue area is not *rationaly related* to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

| | | | |
|--------------------------------------|--|--------------------------|----------------------|
| Potentially Significant Impact | Less than significant with mitigation | Less than significant | Finding ³ |
|--------------------------------------|--|--------------------------|----------------------|

XVII. MANDATORY FINDINGS OF SIGNIFICANCE --

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XVIII MITIGATION MONITORING PLAN

A potentially significant adverse environmental impact to air quality has been identified in this document. Mitigation measures have been identified and the APCD permit document will include conditions to be implemented and incorporated into the project which will be enforced by the APCD. No additional mitigation monitoring plan is necessary.

REFERENCES

1. William M. Dillon, Deputy County Counsel, County of Santa Barbara, Memorandum regarding Applicability of CEQA to OCS Projects, October 18, 1995
2. 2007 Clean Air Plan and Supplemental EIR (APCD-2004-SEIR-01, SCH # 1991031045)
3. Santa Barbara County Air Pollution Control District, Revised November, 2000. Environmental Review Guidelines for the Santa Barbara County Air Pollution Control District: Guidelines for implementing the California Environmental Quality Act of 1970, as amended.

³ The APCO finds that the analysis of issue areas, other than air quality, is not rationally related to the attainment and maintenance of federal and state ambient air quality standards and compliance with Part C of Title I of the Clean Air Act.

ATTACHMENT A

ExxonMobil Platform Heritage Permit to Operate Modification No. 9102-04

Project Daily Emissions

| Equipment Item | Description | | NOx | | ROC | | |
|--|---|---------------|-------|----------|-----------------|--------|---------------|
| | | | lb/hr | lb/day | lb/hr | lb/day | |
| | Exxon ID # | APCD DeviceNo | | | | | |
| Supply Boat | Main Engine - DPV | 5357 | 48.19 | 1060.20 | 2.40 | 52.85 | |
| | Main Engine - Spot Charter | 104959 | 80.22 | 1764.91 | 2.40 | 52.85 | |
| | Generator Engine - DPV | 5358 | 6.60 | 145.20 | 0.54 | 11.86 | |
| | Bow Thruster - DPV | 5359 | 16.50 | 49.50 | 1.35 | 4.04 | |
| | Winch - DPV | 104962 | 13.50 | 40.49 | 1.10 | 3.31 | |
| | Emergency Response | 5360 | -- | -- | -- | -- | |
| Supply Boat - Cable Repair Vessel (CRP) | | | | | | | |
| | Main Engine - Caterpillar (S2R00119) | | 26.64 | 639.39 | 1.21 | 29.15 | |
| | Main Engine - Caterpillar (S2R00117) | | 26.64 | 639.39 | 1.21 | 29.15 | |
| | Main Engine - Caterpillar (S2R00118) | | 26.64 | 639.39 | 1.21 | 29.15 | |
| | Main Engine - Caterpillar (S2R00116) | | 0.00 | 0.00 | 0.00 | 0.00 | |
| | Main Engine - Mitsubishi (Locked Out) | | 0.00 | 0.00 | 0.00 | 0.00 | |
| | Emergency Generator Engine (Serial No. 0182363/1) | | 2.90 | 2.90 | 0.14 | 0.14 | |
| | Survival Craft Engine (Volvo Penta 41) | | 0.40 | 0.40 | 0.01 | 0.01 | |
| | Incinerator (Locked Out) | | 0.00 | 0.00 | 0.00 | 0.00 | |
| | sub-total = | | 83.22 | 1,921.46 | 3.79 | 87.61 | |
| Rule 202 Permit Exempt | | | | | | | |
| | Auxiliary Engine - 15-Ton Cable Engine | | 0.89 | 21.24 | 0.10 | 2.36 | |
| | Auxiliary Engine - 10-Ton Cable Engine | | 3.89 | 93.33 | 0.37 | 8.97 | |
| | Auxiliary Engine - Prysmian Winch Engine | | 1.27 | 30.48 | 0.14 | 3.39 | |
| | Auxiliary Engine- Rear Deck Crane Engine (Exact unit not defined) | | 1.60 | 12.84 | 0.16 | 1.31 | |
| | Boiler | | 0.00 | 0.00 | 0.00 | 0.00 | |
| TOTALS FOR CEQA ANALYSIS (POUNDS PER DAY) | | | | | 2,078.99 | | 103.64 |

ATTACHMENT B

Air Quality Mitigation Agreement
for ExxonMobil SYU C1 Cable Repair Project
For Permit to Operate Modification No. 9102-04

ExxonMobil will provide \$14,300.00 for each of ten tons of oxides of nitrogen (NOx) emissions from the C1 Cable Repair Project that will be permitted by the Air Pollution Control District (APCD) under Permit to Operate, Modification No. 9102-04.

Total mitigation funds in the amount of \$143,000 are to be deposited to an interest-bearing Air Pollution Control District account with interest accrued to the account on an annual basis. Payment of mitigation funds shall be made in one lump-sum payment upon issuance of APCD Permit to Operate, Modification No. 9102-04.

The Air Pollution Control District will fund emission reduction projects in Santa Barbara County that demonstrate a cost-effectiveness of up to \$14,300 per ton of NOx emissions, inclusive of APCD staff time to implement the projects.

APCD will secure up to 10 tons of NOx emissions reductions and any remaining funds will be used at the discretion of the APCD for additional clean air emission reduction projects. All emission reductions obtained with the mitigation funds are for clean air and may not be used for offsets or emission reduction credits in any manner.



PERMIT TO OPERATE 09102 – 04
and
Part 70 Minor Modification 9102 - 04

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ATTACHMENT C

EQUIPMENT OWNER/OPERATOR:

ExxonMobil Production Company

220113

EQUIPMENT LOCATION:

Platform Heritage, Parcel OCS-P-0182, Santa Ynez Unit

STATIONARY SOURCE/FACILITY:

Exxon - SYU Project
Platform Heritage

SSID: 01482

FID: 08019

EQUIPMENT DESCRIPTION:

Normal project crew and supply boat engines are identified in Table 5.1 of this permit. The temporary cable repair equipment is addressed in Section 2.2 of the Permit Evaluation.

PROJECT/PROCESS DESCRIPTION:

The operator will temporarily use a special vessel, the *Ocean Intervention III*, along with other support equipment to find and repair a fault in Cable C1. Cable C1 is one of six cables that provide electrical power and communication services to the SYU platforms. Cable C1 runs from shore to Platform Heritage. The fault is located southeast of Platform Heritage on the OCS in approximately 1,125 feet of water. This cable repair activity is expected to take about 25-days to complete. The vessel has larger horsepower main engines than the project supply boat used as the basis for permitted supply boat emissions; however, operational restrictions are included in this permit to ensure the vessel does not exceed the existing total permitted daily (PTE) emissions for supply boats. Also, quarterly emissions from the cable repair vessel engines are restricted to ten (10) tons.

This permit modification also corrects an error in the permitted supply boat emissions when the *M/V Broadbill* was added as a designated project vessel under Authority to Construct 11986 issued 05/23/06 and under Permit to Operate 11986 issued 08/16/06. A discussion of these calculations is included in the attached Permit Evaluation.

Permit to Operate 09102 - 04
and
Part 70 Minor Modification 9102 - 04

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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.

Conditions listed in Sections A, B, and C are enforceable by the USEPA, the APCD, the State of California and the public. Conditions listed in Section D are enforceable only by the APCD 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 APCD rule, the wording of the rule shall control.

- A.1 **Condition Acceptance.** Acceptance of this operating permit by ExxonMobil shall be considered as acceptance of all terms, conditions, and limits of this permit. [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.** ExxonMobil agrees, as a condition of the issuance and use of this PTO, to defend at its sole expense any action brought against the APCD because of issuance of this permit. ExxonMobil shall reimburse the APCD for any and all costs including, but not limited to, court costs and attorney's fees which the APCD may be required by a court to pay as a result of such action. The APCD may, at its sole discretion, participate in the defense of any such action, but such participation shall not relieve ExxonMobil of its obligation under this condition. The APCD 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 APCD Rule 210, incurred by the APCD, APCD 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 ExxonMobil as required by Rule 210. [Re: PTO 9102, APCD 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 APCD or its agents, ExxonMobil shall make such records available or provide access to such facilities upon notice from the APCD. 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 APCD's project file) and the APCD's analyses under which this permit is issued as documented in the Permit Analyses prepared for and issued with the permit. [Re: PTO 9102]

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- 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 No. 5651, Permit to Operate No. 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.** ExxonMobil 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 APCD. [*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:
 - (1) Compliance with the permit, or
 - (2) Whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action.
 - (g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail to the extent feasible. [*Re: 40 CFR Part 70.6.(a)(6), APCD Rules 1303.D.1*]
- A.11 **Emergency Provisions.** The permittee shall comply with the requirements of the APCD, Rule 505 (Upset/Breakdown rule) and/or APCD Rule 1303.F, whichever is applicable to the emergency situation. In

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order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the APCD, in writing, a “notice of emergency” within 2 working days of the emergency. The “notice of emergency” shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [Re: 40 CFR 70.6(g), APCD Rule 1303.F]

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: APCD 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: APCD Rule 1303.D.2]

A.14 Severability. The provisions of this Permit to Operate are severable and if any provision of this Permit to Operate is held invalid, the remainder of this Permit to Operate shall not be affected thereby. [Re: APCD Rules 103 and 1303.D.1]

A.15 Payment of Fees. The permittee shall reimburse the APCD 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 APCD and the USEPA pursuant to section 502(a) of the Clean Air Act. [Re: APCD Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6(a)(7)]

A.16 Prompt Reporting of Deviations. The permittee shall submit a written report to the APCD 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.

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

- A.17 **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 APCD approved forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1st and March 1st, respectively, each year. Supporting monitoring data shall be submitted in accordance with the "Semi-Annual Compliance Verification Report" condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [Re: APCD Rules 1303.D.1, 1302.D.3, 1303.2.c]
- A.18 **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 APCD-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.19 **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 APCD upon request. [Re: APCD Rule 1303.D.1.f, 40 CFR 70.6(a)(3)]
- A.20 **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 APCD or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or

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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 APCD 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.21 **Credible Evidence.** Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding. [*Re: 40 CFR 52.12(c)*]

9.B. Generic Conditions

The generic conditions listed below apply to all emission units, regardless of their category or emission rates. These conditions are federally enforceable. In the case of a discrepancy between the wording of a condition and the applicable APCD 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 APCD Rule 303. [*Re: APCD Rule 301*]
- B.2. **Visible Emissions (Rule 302).** ExxonMobil shall not discharge into the atmosphere from any single source of emission any air contaminants for a period or periods aggregating more than three minutes in any one hour which is:
 - (a) As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
 - (b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection B.2.(a) above.
 - (c) ExxonMobil shall determine compliance with the requirements of this Condition/Rule and Condition C.49 in Part 70/APCD PTO 5651. [*Re: APCD Rule 302*]
- B.3. **Nuisance (Rule 303).** No pollutant emissions from any source at ExxonMobil shall create nuisance conditions. No operations shall endanger health, safety or comfort, nor shall they damage any property or business. [*Re: APCD Rule 303*]

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- B.4. **PM Concentration - South Zone (Rule 305).** ExxonMobil shall not discharge into the atmosphere, from any source, particulate matter in excess of the concentrations listed in Table 305(a) of Rule 305. [Re: APCD Rule 305]
- B.5. **Specific Contaminants (Rule 309).** ExxonMobil shall not discharge into the atmosphere from any single source sulfur compounds, hydrogen sulfide, combustion contaminants and carbon monoxide in excess of the standards listed in Sections A, B and G of Rule 309. ExxonMobil shall not discharge into the atmosphere from any fuel burning equipment unit, sulfur compounds, nitrogen oxides or combustion contaminants in excess of the standards listed in Section E and F of Rule 309. [Re: APCD Rule 309]
- B.6. **Sulfur Content of Fuels (Rule 311).** ExxonMobil shall not burn fuels with a sulfur content in excess of 0.5% (by weight) for liquid fuels and 239 ppmvd or 15 gr/100scf (calculated as H₂S) for gaseous fuels. Compliance with this condition shall be based on continuous monitoring of the fuel gas with H₂S and HHV analyzers, quarterly total sulfur content measurements of the fuel gas using ASTM or other APCD-approved methods and diesel fuel billing records or other data showing the certified sulfur content for each shipment. [Re: APCD Rule 311]

9.C Requirements and Equipment Specific Conditions

This section contains non-generic federally-enforceable conditions, including emissions and operations limits, monitoring, recordkeeping, and reporting for each specific equipment group. This section may also contain other non-generic conditions. Condition C.1 and Tables 5.1 through 5.6 in this permit supersede Condition 9.C.5 and the corresponding tables in Part 70/PTO 9102-R3. They also supersede Condition C.1 and the corresponding tables in PTO 11986.

- C.1 **Crew and Supply Boats.** The following equipment are included in this emissions category:

| Device Type | APCD DeviceNo | Device Type | APCD DeviceNo |
|----------------------------|------------------|----------------------------|------------------|
| <i>Crew Boat</i> | | <i>Supply Boat</i> | |
| Main Engine - DPV | 5361 | Main Engine - DPV | 5357 |
| Main Engine - Spot Charter | 104960 | Main Engine - Spot Charter | 104959 |
| Auxilliary Engine - DPV | 5362 | Generator Engine - DPV | 5358 |
| <i>M/V Broadbill</i> | | Bow Thruster - DPV | 5359 |
| Main Engine - DPV | 107900 | Winch - DPV | 104962 |
| Auxilliary Engine - DPV | 107901 | Emergency Response | 5360 |

- (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 *Broadbill*) 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:

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- (i) *NO_x Emissions* - Except as provided below, controlled emissions of NO_x 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_x emission rate. Controlled emissions of NO_x from the Tier II diesel fired main propulsion engines on the *M/V Broadbill* crew boat, shall not exceed 218.98 lb/kgal (5.46 g/bhp-hr). Controlled emissions of NO_x from the Tier II diesel fired auxiliary engines on the *M/V Broadbill* crew boats, 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 - 01.
 - (ii) *Crew, Supply and Emergency Response Boat Stationary Source Maximum Permitted Emissions* - To more accurately define the *Exxon – 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 Exxon – SYU platforms. For compliance with the limits in (i) – (iv) below, all the fuel use within 25-miles of the Exxon – SYU platforms shall be assigned according the APCD-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* – ExxonMobil shall use the *M/V Broadbill* for at least forty percent (40%) of all crew boat trips to the platforms each year. 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 Exxon – SYU platforms.
 - (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

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- (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 engines shall not use more than: 12,500 gallons per quarter; 50,000 gallons per year of diesel fuel. ExxonMobil's allocation of allowable emergency response boat fuel usage for OCS Platforms Heritage, Heritage and Hondo shall not exceed: 1,137 gallons per quarter; 4,546 gallons per year of diesel fuel.
- (vii) *Crew, Supply and Emergency Response Boat Stationary Source Operational Limits* - To more accurately define the Exxon – 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 Section 2.2.3 of Part 70/PTO 9102-R3. Any boats for or in support of activities not specified in Section 2.2.3 of Part 70/PTO 9102-R3 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. In no case will drill ships be considered an allowed use of a project boat.
- (x) *Liquid Fuel Sulfur Limit* - Diesel fuel used by all IC engines shall have sulfur content no greater than 0.0015 weight percent as determined by APCD-approved ASTM methods.
- (xi) *New/Replacement Boats* - With the exception of the *M/V Broadbill* crew boat, ExxonMobil 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 5.3 emission line items of this permit; and

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- (3) The NO_x, ROC, CO, PM and PM₁₀ emission factors are the same or less for the main and auxiliary engines. For the main engines, NO_x emissions must meet the 337 lb/1,000 gallons emission standard.
 - (4) The above criteria also apply to spot charter boats, except for the NO_x 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 APCD may require manufacturer guarantees and emission source tests to verify this NO_x emission standard.
 - (5) ExxonMobil shall revise the Boat Monitoring and Reporting Plan, obtain APCD 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 ExxonMobil 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, ExxonMobil shall submit the information listed below to the APCD 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 *ExxonMobil – SYU Project*. For spot charters, this information shall be submitted within thirty (30) calendar days after the boat is first brought into service. ExxonMobil shall notify the APCD Project Manager (via fax or e-mail) within three (3) calendar days after a new spot charter is first brought into operation. Any boat put into service that does not meet the requirements above, as determined by the APCD 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 manufacturers' data on the emission levels for the various engines and applicable engine specification curves.
 - (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 Honda.
 - (5) Any other information the APCD 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 - 01 are valid only for the *M/V Broadbill* crew boat and the associated newly installed Tier II main propulsion and auxiliary engines. Any alteration to the engines installed in the *M/V Broadbill* or alteration to the actual crew boat operated by ExxonMobil shall require a modification to the DOI and to the underlying ATC to re-analyze the validity of the ERCs. If the APCD determines that

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the ERCs are no longer valid, then ExxonMobil shall provide substitute ERCs and apply for necessary permit modifications.

- (c) Monitoring: ExxonMobil shall fully implement the APCD approved *Boat Monitoring and Reporting Plan* for the life of the project, and shall obtain APCD 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) ExxonMobil may use alternative methods (including location methods) for documenting and reporting boat activity, fuel usage and emissions, provided these methods are approved by the APCD as being equivalent in accuracy and reliability to those of the APCD'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 APCD-approved procedures. These data shall be submitted in an APCD-approved format to the APCD.
- (d) Recordkeeping: The following records shall be maintained in legible logs and shall be made available to the APCD 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 APCD upon request. For each main and auxiliary engine with timing retard, an APCD 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.
- (e) Reporting: On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the APCD. 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 APCD determines that logs or reports indicate fuel use greater than the limits of Condition 9.C.1(b) of this permit, ExxonMobil 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: APCD Rule 1303, PTO

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9102, ATC/PTO 10038, ATC/PTO 10169, ATC/PTO 10738, ATC/PTO 10800, ATC/PTO 11236, ATC 11986, 40 CFR 70.6]

Cable Repair Activity Permit Conditions. The permit conditions below apply only to the cable repair activity. These conditions are in effect for the duration of the cable repair activity and expire 14-days after termination of the repair activity.

- C.2 **Cable Repair Activity Termination.** Cable repair activity termination is defined as the date the repair activity vessel leaves waters off Santa Barbara County after completion of all repair work. ExxonMobil shall notify the APCD within 3-days after the repair activity termination date.
- C.3 **Cable Repair Activity Emissions Cap.** Emissions of NO_x from the repair activity engines listed in Attachment “A” of the Engineering Evaluation of this permit shall not exceed 10 tons during the duration of this repair activity.
- C.4 **Cable Repair Activity Start-up Notification.** ExxonMobil shall notify the APCD the APCD within 2 days after the cable repair vessel has entered water off of Santa Barbara County.
- C.5 **Operational Restrictions.**
- a. Main Engine #4 as listed in the table in Section 2.2 of the Permit Evaluation shall be locked out and only used in the event of the breakdown of one of the other Caterpillar main engines.
 - b. At no time shall more than three of the Caterpillar main engines operate at the same time.
 - c. Main Engine #5, the Mitsubishi engine, shall be locked out for the duration of the repair activity.
 - d. The incinerator shall be locked out for the duration of the repair activity.

The lock-out procedures shall be consistent with those in Appendix “F” of the APCD approved *Boat Monitoring and Reporting Plan* dated xx/yy/zz.

- C.6 **Fuel Monitoring.** ExxonMobil shall implement fuel use monitoring in accordance with Appendix “F” of the APCD approved *Boat Monitoring and Reporting Plan* dated xx/yy/zz.
- C.7 **NO_x Emissions Mitigation.** In accordance with the Air Quality Mitigation Agreement provided in Attachment B of the Mitigated Negative Declaration dated xx xx, 2008, ExxonMobil shall provide \$14,300.00 for each of ten tons of NO_x emissions to an interest bearing APCD account to compensate for projected NO_x emissions increases associated with the cable repair activity engines. ExxonMobil shall make a lump sum payment of \$143,000 upon issuance of this permit.
- C.8 **Cable Repair Activity Completion Report.** Within 14-days after the repair activity termination, ExxonMobil shall submit a report to the APCD detailing the start and end dates of the repair activity, the volume of fuel consumed in each of the repair activity engines and the total emissions for the repair activity. Supporting emission calculations shall also be submitted. In addition, emissions from the cable repair vessel shall be added to the quarterly and annual supply boat emissions and reported in the CVR required per Condition 9.C.10 of Part 70/PTO 9102-R3.

Permit to Operate 09102 - 04
and
Part 70 Minor Modification 9102 - 04

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AIR POLLUTION CONTROL OFFICER

DATE

Attachments:

- Table 5.1 – Operating Equipment Description
- Table 5.2 – Equipment Emission Factors
- Table 5.3 – Short Term Emission Limits
- Table 5.4 – Long Term Emission Limits
- Table 5.5 – Facility Potential to Emit
- Table 5.6 – Federal Potential to Emit
- Permit Evaluation for Permit to Operate Mod 9102-04

Notes:

- Reevaluation Due Date: May 1, 2009
- Stationary sources are subject to an annual emission fee (see Fee Schedule B-3 of Rule 210).
- Annual reports are due by March 1st of each year.

Table 5.1: Operating Equipment Description
 ExxonMobil Platform Heritage
 Permit to Operate Mod 9102-04

| Equipment Item | Description | | Device Specifications | | | | Usage Data | | | Maximum Operating Schedule | | | | References |
|----------------|-------------|----------------------------------|-----------------------|----|--------|-------|------------|------------------|------|----------------------------|-----|-------|-------|------------|
| | Exxon ID # | APCD DeviceNo | Fuel | %S | Size | Units | Capacity | Units | Load | hr | day | qtr | year | |
| Supply Boat | | Main Engine - DPV | 5357 | 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 | 5358 | D2 | 0.0015 | 400 | bhp-total | 0.055 gal/bhp-hr | 0.50 | 1 | 22 | 534 | 2,137 | |
| | | Bow Thruster - DPV | 5359 | 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 | 5360 | D2 | 0.0015 | 1,770 | bhp-total | 0.055 gal/bhp-hr | 0.65 | -- | -- | 18 | 72 | |
| Crew Boat | | Main Engine - DPV | 5361 | 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 | |
| | | Auxilliary Engine - DPV | 5362 | 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 | |

Table 5.2: Equipment Emission Factors
ExxonMobil Platform Heritage
Permit to Operate Mod 9102-04

| Equipment Item | Description | | Emission Factors | | | | | | | Reference | |
|-----------------------------|-------------|----------------------------------|------------------|--------|-------|--------|------|-------|-------|-------------|---|
| | Exxon ID # | APCD DeviceNo | NOx | ROC | CO | SOx | PM | PM10 | Units | | |
| Supply Boat ^{1, 2} | | Main Engine - DPV | 5357 | 337.00 | 16.80 | 78.30 | 0.21 | 33.00 | 31.68 | lb/1000 gal | E |
| | | Main Engine - Spot Charter | 104959 | 561.00 | 16.80 | 78.30 | 0.21 | 33.00 | 31.68 | lb/1000 gal | |
| | | Generator Engine - DPV | 5358 | 600.00 | 49.00 | 129.30 | 0.21 | 42.20 | 40.51 | lb/1000 gal | |
| | | Bow Thruster - DPV | 5359 | 600.00 | 49.00 | 129.30 | 0.21 | 42.20 | 40.51 | lb/1000 gal | |
| | | Winch - DPV | 104962 | 600.00 | 49.00 | 129.30 | 0.21 | 42.20 | 40.51 | lb/1000 gal | |
| | | Emergency Response | 5360 | 561.17 | 16.80 | 44.60 | 0.21 | 33.00 | 31.68 | lb/1000 gal | |
| Crew Boat ^{1, 2} | | Main Engine - DPV | 5361 | 336.70 | 17.10 | 80.90 | 0.21 | 33.00 | 31.68 | lb/1000 gal | F |
| | | Main Engine - DPV Broadbill | 107900 | 218.98 | 17.10 | 80.90 | 0.21 | 5.93 | 5.93 | lb/1000 gal | |
| | | Main Engine - Spot Charter | 104960 | 561.17 | 17.10 | 80.90 | 0.21 | 33.00 | 31.68 | lb/1000 gal | |
| | | Auxilliary Engine - DPV | 5362 | 600.05 | 48.98 | 129.26 | 0.21 | 42.18 | 40.49 | lb/1000 gal | |
| | | Auxiliary Engine - DPV Broadbill | 107901 | 217.87 | 48.98 | 129.26 | 0.21 | 5.93 | 5.93 | lb/1000 gal | |

Notes:

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

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

Table 5.3: Short-Term Emissions
ExxonMobil Platform Heritage
Permit to Operate Mod 9102-04

| Equipment Item | Description | | NOx | | ROC | | CO | | SOx | | PM | | PM10 | | Federal | |
|----------------|-------------|----------------------------------|--------|--------|----------|--------|-------|--------|--------|--------|-------|--------|--------|--------|----------------|----|
| | Exxon ID # | APCD DeviceNo | 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 | 5357 | 48.19 | 1,060.20 | 2.40 | 52.85 | 11.20 | 246.33 | 0.03 | 0.67 | 4.72 | 103.82 | 4.53 | 99.67 | FE |
| | | Main Engine - Spot Charter | 104959 | 80.22 | 1,764.91 | 2.40 | 52.85 | 11.20 | 246.33 | 0.03 | 0.67 | 4.72 | 103.82 | 4.53 | 99.67 | FE |
| | | Generator Engine - DPV | 5358 | 6.60 | 145.20 | 0.54 | 11.86 | 1.42 | 31.29 | 0.00 | 0.05 | 0.46 | 10.21 | 0.45 | 9.80 | FE |
| | | Bow Thruster - DPV | 5359 | 16.50 | 49.50 | 1.35 | 4.04 | 3.56 | 10.67 | 0.01 | 0.02 | 1.16 | 3.48 | 1.11 | 3.34 | 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 | FE |
| | | Emergency Response | 5360 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- | NE |
| Crew Boat | | Main Engine - DPV | 5361 | 60.76 | 1,318.48 | 3.09 | 66.96 | 14.60 | 316.79 | 0.04 | 0.83 | 5.96 | 129.22 | 5.72 | 124.05 | FE |
| | | Main Engine - DPV Broadbill | 107900 | 24.57 | 540.54 | 1.92 | 42.21 | 9.08 | 199.69 | 0.02 | 0.52 | 0.67 | 14.63 | 0.67 | 14.63 | FE |
| | | Main Engine - Spot Charter | 104960 | 101.27 | 2,197.46 | 3.09 | 66.96 | 14.60 | 316.79 | 0.04 | 0.83 | 5.96 | 129.22 | 5.72 | 124.05 | FE |
| | | Auxilliary Engine - DPV | 5362 | 4.32 | 93.82 | 0.35 | 7.66 | 0.93 | 20.21 | 0.00 | 0.03 | 0.30 | 6.59 | 0.29 | 6.33 | 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 | FE |

Notes:

FE = Federally enforceable

AE = APCD-only enforceable

NE = Not enforceable

Table 5.4: Long-Term Emissions
ExxonMobil Platform Heritage
Permit to Operate Mod 9102-04

| Equipment Item | Description | | NOx | | ROC | | CO | | SOx | | PM | | PM10 | | Federal |
|----------------|----------------------------------|---------------|-------|-------|------|------|-------|-------|------|------|------|------|------|------|----------------|
| | Exxon ID # | APCD DeviceNo | TPQ | TPY | TPQ | TPY | TPQ | TPY | TPQ | TPY | TPQ | TPY | TPQ | TPY | Enforceability |
| Supply Boat | Main Engine - DPV | 5357 | 10.16 | 40.65 | 0.51 | 2.03 | 2.36 | 9.45 | 0.01 | 0.03 | 1.00 | 3.98 | 0.96 | 3.82 | FE |
| | Main Engine - Spot Charter | 104959 | 1.69 | 6.77 | 0.05 | 0.20 | 0.24 | 0.94 | 0.00 | 0.00 | 0.10 | 0.40 | 0.10 | 0.38 | FE |
| | Sub-total = | | 11.86 | 47.42 | 0.56 | 2.23 | 2.60 | 10.39 | 0.01 | 0.03 | 1.09 | 4.38 | 1.05 | 4.20 | FE |
| | Generator Engine - DPV | 5358 | 1.76 | 7.05 | 0.14 | 0.58 | 0.38 | 1.52 | 0.00 | 0.00 | 0.12 | 0.50 | 0.12 | 0.48 | FE |
| | Bow Thruster - DPV | 5359 | 0.60 | 2.40 | 0.05 | 0.20 | 0.13 | 0.52 | 0.00 | 0.00 | 0.04 | 0.17 | 0.04 | 0.16 | FE |
| Crew Boat | 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 | FE |
| | Emergency Response | 5360 | 0.32 | 1.28 | 0.01 | 0.04 | 0.03 | 0.10 | 0.00 | 0.00 | 0.02 | 0.08 | 0.02 | 0.07 | FE |
| | Main Engine - DPV | 5361 | 6.00 | 23.99 | 0.30 | 1.22 | 1.44 | 5.76 | 0.00 | 0.02 | 0.59 | 2.35 | 0.56 | 2.26 | 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 | FE |
| | Main Engine - Spot Charter | 104960 | 1.67 | 6.66 | 0.05 | 0.20 | 0.24 | 0.96 | 0.00 | 0.00 | 0.10 | 0.39 | 0.09 | 0.38 | FE |
| Sub-total = | | 10.26 | 41.05 | 0.56 | 2.23 | 2.64 | 10.57 | 0.01 | 0.03 | 0.76 | 3.02 | 0.73 | 2.91 | FE | |
| | Auxilliary Engine - DPV | 5362 | 1.82 | 7.26 | 0.15 | 0.59 | 0.39 | 1.56 | 0.00 | 0.00 | 0.13 | 0.51 | 0.12 | 0.49 | 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 | FE |
| | Sub-total = | | 2.26 | 9.02 | 0.25 | 0.99 | 0.65 | 2.61 | 0.00 | 0.00 | 0.14 | 0.56 | 0.13 | 0.54 | FE |

Notes:

FE = Federally enforceable

AE = APCD-only enforceable

NE = Not enforceable

**Table 5.5: Facility Potential to Emit
ExxonMobil Platform Heritage
Permit to Operate Mod 9102-04**

A. Hourly

| Equipment Category | NOx | ROC | CO | SOx | PM | PM10 |
|---------------------------|---------------|--------------|--------------|-------------|--------------|--------------|
| Combustion - Engines | 150.19 | 12.23 | 33.50 | 2.01 | 11.05 | 11.05 |
| Combustion - External | 0.98 | 0.15 | 8.08 | 0.30 | 0.20 | 0.20 |
| Combustion - Flare | 0.09 | 0.16 | 0.51 | 2.05 | 0.03 | 0.03 |
| Fugitive Components | -- | 8.92 | -- | -- | -- | -- |
| Supply Boat | 100.32 | 4.04 | 15.53 | 0.04 | 6.13 | 5.89 |
| Emergency Response | -- | -- | -- | -- | -- | -- |
| Crew Boat | 105.59 | 3.44 | 15.53 | 5.29 | 6.26 | 6.01 |
| Pigging | -- | 1.23 | -- | -- | -- | -- |
| Sumps/Tanks/Separators | -- | 0.06 | -- | -- | -- | -- |
| Solvent Usage | -- | 0.46 | -- | -- | -- | -- |
| Totals (lb/hr) | 357.17 | 30.69 | 73.15 | 9.69 | 23.67 | 23.17 |

B. Daily

| Equipment Category | NOx | ROC | CO | SOx | PM | PM10 |
|---------------------------|-----------------|---------------|---------------|---------------|---------------|---------------|
| Combustion - Engines | 483.70 | 44.98 | 131.61 | 7.48 | 43.17 | 43.17 |
| Combustion - External | 23.50 | 3.52 | 193.88 | 2.55 | 4.90 | 4.90 |
| Combustion - Flare | 2.23 | 3.95 | 12.14 | 49.29 | 0.66 | 0.66 |
| Fugitive Components | -- | 214.00 | -- | -- | -- | -- |
| Supply Boat | 2,000.10 | 72.06 | 297.02 | 0.75 | 120.36 | 115.55 |
| Emergency Response | -- | -- | -- | -- | -- | -- |
| Crew Boat | 2,291.28 | 74.62 | 337.00 | 114.72 | 135.82 | 130.39 |
| Pigging | -- | 6.13 | -- | -- | -- | -- |
| Sumps/Tanks/Separators | -- | 1.38 | -- | -- | -- | -- |
| Solvent Usage | -- | 10.96 | -- | -- | -- | -- |
| Totals (lb/day) | 4,800.81 | 431.60 | 971.65 | 174.79 | 304.90 | 294.66 |

C. Quarterly

| Equipment Category | NOx | ROC | CO | SOx | PM | PM10 |
|---------------------------|--------------|--------------|--------------|--------------|-------------|-------------|
| Combustion - Engines | 18.75 | 1.64 | 4.66 | 0.27 | 1.53 | 1.53 |
| Combustion - External | 1.07 | 0.16 | 8.85 | 0.12 | 0.22 | 0.22 |
| Combustion - Flare | 0.51 | 0.92 | 2.83 | 18.21 | 0.15 | 0.15 |
| Fugitive Components | -- | 9.76 | -- | -- | -- | -- |
| Supply Boat | 14.71 | 0.79 | 3.21 | 0.01 | 1.30 | 1.24 |
| Emergency Response | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 |
| Crew Boat | 12.52 | 0.81 | 3.29 | 0.01 | 0.90 | 0.86 |
| Pigging | -- | 0.02 | -- | -- | -- | -- |
| Sumps/Tanks/Separators | -- | 0.06 | -- | -- | -- | -- |
| Solvent Usage | -- | 0.50 | -- | -- | -- | -- |
| Totals (TPQ) | 47.57 | 14.68 | 22.85 | 18.62 | 4.11 | 4.03 |

D. Annual

| Equipment Category | NOx | ROC | CO | SOx | PM | PM10 |
|---------------------------|---------------|--------------|--------------|--------------|--------------|--------------|
| Combustion - Engines | 32.44 | 3.17 | 9.49 | 0.53 | 3.11 | 3.11 |
| Combustion - External | 4.29 | 0.64 | 35.38 | 0.46 | 0.89 | 0.89 |
| Combustion - Flare | 2.05 | 3.68 | 11.30 | 72.83 | 0.61 | 0.61 |
| Fugitive Components | -- | 39.05 | -- | -- | -- | -- |
| Supply Boat | 58.85 | 3.16 | 12.85 | 0.03 | 5.18 | 4.98 |
| Emergency Response | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 |
| Crew Boat | 50.07 | 3.22 | 13.17 | 0.03 | 3.58 | 3.45 |
| Pigging | -- | 0.09 | -- | -- | -- | -- |
| Sumps/Tanks/Separators | -- | 0.25 | -- | -- | -- | -- |
| Solvent Usage | -- | 2.00 | -- | -- | -- | -- |
| Totals (TPY) | 147.71 | 55.29 | 82.21 | 73.90 | 13.39 | 13.05 |

**Table 5.6: Federal Potential to Emit
ExxonMobil Platform Heritage
Permit to Operate Mod 9102-04**

A. Hourly

| Equipment Category | NOx | ROC | CO | SOx | PM | PM10 |
|---------------------------|---------------|--------------|--------------|--------------|--------------|--------------|
| Combustion - Engines | 150.19 | 12.23 | 33.50 | 2.01 | 11.05 | 11.05 |
| Combustion - External | 0.98 | 0.15 | 8.08 | 0.30 | 0.20 | 0.20 |
| Combustion - Flare | 0.09 | 0.16 | 0.51 | 2.05 | 0.03 | 0.03 |
| Fugitive Components | -- | 8.92 | -- | -- | -- | -- |
| Supply Boat | 100.32 | 4.04 | 15.53 | 4.97 | 6.13 | 5.89 |
| Emergency Response | -- | -- | -- | -- | -- | -- |
| Crew Boat | 105.59 | 3.44 | 15.53 | 5.29 | 6.26 | 6.01 |
| Pigging | -- | 1.23 | -- | -- | -- | -- |
| Sumps/Tanks/Separators | -- | 0.06 | -- | -- | -- | -- |
| Solvent Usage | -- | 0.46 | -- | -- | -- | -- |
| Totals (lb/hr) | 357.17 | 30.69 | 73.15 | 14.62 | 23.67 | 23.17 |

B. Daily

| Equipment Category | NOx | ROC | CO | SOx | PM | PM10 |
|---------------------------|-----------------|---------------|---------------|---------------|---------------|---------------|
| Combustion - Engines | 483.70 | 44.98 | 131.61 | 7.48 | 43.17 | 43.17 |
| Combustion - External | 23.50 | 3.52 | 193.88 | 2.55 | 4.90 | 4.90 |
| Combustion - Flare | 2.23 | 3.95 | 12.14 | 49.29 | 0.66 | 0.66 |
| Fugitive Components | -- | 214.00 | -- | -- | -- | -- |
| Supply Boat | 2,000.10 | 72.06 | 297.02 | 0.75 | 120.36 | 115.55 |
| Emergency Response | -- | -- | -- | -- | -- | -- |
| Crew Boat | 2,291.28 | 74.62 | 337.00 | 114.72 | 135.82 | 130.39 |
| Pigging | -- | 6.13 | -- | -- | -- | -- |
| Sumps/Tanks/Separators | -- | 1.38 | -- | -- | -- | -- |
| Solvent Usage | -- | 10.96 | -- | -- | -- | -- |
| Totals (lb/day) | 4,800.81 | 431.60 | 971.65 | 174.79 | 304.90 | 294.66 |

C. Quarterly

| Equipment Category | NOx | ROC | CO | SOx | PM | PM10 |
|---------------------------|--------------|--------------|--------------|--------------|-------------|-------------|
| Combustion - Engines | 18.75 | 1.64 | 4.66 | 0.27 | 1.53 | 1.53 |
| Combustion - External | 1.07 | 0.16 | 8.85 | 0.12 | 0.22 | 0.22 |
| Combustion - Flare | 0.51 | 0.92 | 2.83 | 18.21 | 0.15 | 0.15 |
| Fugitive Components | -- | 9.76 | -- | -- | -- | -- |
| Supply Boat | 23.04 | 0.75 | 3.36 | 1.20 | 1.41 | 1.36 |
| Emergency Response | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 |
| Crew Boat | 12.52 | 0.81 | 3.29 | 0.01 | 0.90 | 0.86 |
| Pigging | -- | 0.02 | -- | -- | -- | -- |
| Sumps/Tanks/Separators | -- | 0.06 | -- | -- | -- | -- |
| Solvent Usage | -- | 0.50 | -- | -- | -- | -- |
| Totals (TPQ) | 55.90 | 14.63 | 23.00 | 19.81 | 4.23 | 4.14 |

D. Annual

| Equipment Category | NOx | ROC | CO | SOx | PM | PM10 |
|---------------------------|---------------|--------------|--------------|--------------|--------------|--------------|
| Combustion - Engines | 32.44 | 3.17 | 9.49 | 0.53 | 3.11 | 3.11 |
| Combustion - External | 4.29 | 0.64 | 35.38 | 0.46 | 0.89 | 0.89 |
| Combustion - Flare | 2.05 | 3.68 | 11.30 | 72.83 | 0.61 | 0.61 |
| Fugitive Components | -- | 39.05 | -- | -- | -- | -- |
| Supply Boat | 92.14 | 2.97 | 13.42 | 4.76 | 5.61 | 5.39 |
| Emergency Response | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 | 0.01 |
| Crew Boat | 50.07 | 3.22 | 13.17 | 0.03 | 3.58 | 3.45 |
| Pigging | -- | 0.09 | -- | -- | -- | -- |
| Sumps/Tanks/Separators | -- | 0.25 | -- | -- | -- | -- |
| Solvent Usage | -- | 2.00 | -- | -- | -- | -- |
| Totals (TPY) | 181.00 | 55.09 | 82.78 | 78.63 | 13.82 | 13.47 |



PERMIT EVALUATION FOR
PERMIT TO OPERATE 09102 - 04
 and
PART 70 MINOR MODIFICATION 9102 - 04

Page 1 of 6

1.0 BACKGROUND

1.1 General: Permit to Operate Modification application 9102-04 was received on April 18, 2008 and deemed complete on April 29, 2008. This permit modifies PTO 9102 R3 to address the emissions from marine vessel engines associated with the repair of a cable that supplies electricity and communication services to the OCS platforms. Enforceable limitations on the use of the cable vessel engines results in no increases in daily, quarterly and annual Potential to Emit (PTE) above current supply boat permitted emissions. The temporary repair activity is estimated to take 25 days. The permit limits the cable repair activity engine NO_x emissions to 10 tons.

The permit also corrects the supply boat line item in the emission tables from PTO 11986 which contained an error in the supply boat daily permitted emissions. It also adds the following sentence to Section (b)(ix) of the *Crew and Supply Boat* condition: "In no case will drill ships be considered an allowed use of a project boat." These two modifications will be carried forward in future permits for Platform Heritage after the permit for the cable repair activity has expired.

1.2 Permit History: The following is a summary of permit activity for Platform Heritage since the last reevaluation of PT-70/Reeval 09102-R3 in May 2006:

| PERMIT | FINAL ISSUED | PERMIT DESCRIPTION |
|-----------------------|--------------|--|
| 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. |

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

PERMIT EVALUATION FOR
PERMIT TO OPERATE 09102 - 04
and
PART 70 MINOR MODIFICATION 9102 - 04

2.0 ENGINEERING ANALYSIS

2.1 Equipment/Processes: This cable repair requires lifting a portion of failed Cable C1 from the ocean floor and splicing in a new section. The sea based repair requires a vessel having the following general specifications: dynamic positioning (DP2), GPS reference, helicopter deck, approximately 5,000 kw of thruster power, a 20 ton or greater crane, two working class ROVs, clear deck space for splicing (approximately 45 meters by 13 meters, space for caterpillar traction equipment, and adequate cabin space. The operator will temporarily use a special vessel, the *Ocean Intervention III*, along with other support equipment described in this permit to complete this task. The cable repair activity is expected to take 25-days to complete. The emissions from this activity are entirely from internal combustion engines.

The cable repair vessel fits under the allowed use of a project supply boat per Permit to Operate 9102 and therefore its emissions will be combined with other supply vessel for compliance with the existing (PTE) limits. As such, there is no increase in quarterly and annual emissions due to the use of this vessel. The worst case permitted daily emissions for a supply boat are currently based on spot charter assumptions and since these emissions are greater than the lb/day PTE of the cable vessel there is no permitted increase in the lb/day emissions. However, since this vessel will be used in conjunction with other designated project vessel (DPV) supply boats, there will be an actual increase in emissions. A permit condition is included in this permit to cap the marine vessel emissions from this activity at 10 tons of NO_x. In no case can the total quarterly permitted limit of 14.71 tons of NO_x be exceeded.

Monitoring of fuel use and emissions reporting are addressed in Appendix “F” of the *Boat Monitoring Plan* that is an enforceable part of this permit.

2.2 Emission Controls: The following table lists the engines and their controls aboard the *Ocean Intervention III* that contribute to the permitted emissions from the cable repair activity:

| Equipment Type | Description | Emission Controls ¹ | Operational Status for the Activity |
|----------------------------|--|--------------------------------|-------------------------------------|
| Main Engine #1 | Caterpillar 3516 Serial: S2R00119 | TC, AC, EC | In Use |
| Main Engine #2 | Caterpillar 3516 Serial: S2R00117 | TC, AC, EC | In Use |
| Main Engine #3 | Caterpillar 3516 Serial: S2R00118 | TC, AC, EC | Partial Use |
| Main Engine #4 | Caterpillar 3516 Serial: S2R00116 | TC, AC, EC | Locked Out ² |
| Main Engine #5 | Mitsubishi Order No. 1049 | TC, IC | Lock Out/Tag Out |
| Emergency Generator Engine | Scania Industrial & Marine DI16 44M Serial No. 0182363/1 | | Safety Req. Testing Only |
| Survival Craft | Volvo Penta 41 ID No. 860449 | | Safety Req. Testing Only |

¹ TC = Turbocharged, AC = Aftercooled, EC = Electronic Controls

² The fourth Caterpillar Main Engine will be used only in place of one of the operating main engines if one of the three should fail. The engine will not be used unless a situation occurs and in no case will four engines be operated at the same time. The four Caterpillar main engines are the same make, model and manufacturer date; the emission factors are the same.

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The following equipment is also part of the cable repair activity and either has a California Portable Engine Registration (PERP) certificate, or claims an exemption provided by APCD rules, or is locked out:

| Equipment Type | Description | Emission Controls ³ | Operational Status for the Activity | Permitting Exemptions |
|---|--|--------------------------------|-------------------------------------|--|
| Auxiliary Engine - 15-Ton Cable Engine | Cummins QSC Serial No. 46844646 | US EPA Tier 3 | In Use | Rule 202 F.2 - PERP – #143159 |
| Auxiliary Engine - 10-Ton Cable Engine | GMC 8V-71N | | In Use | Rule 202 D.5 |
| Auxiliary Engine – Prysmian Winch Engine | Caterpillar 3126B Serial: BEJ04881 | US EPR Tier 2 | In Use | Rule 202 F.2 – PERP - #133855 |
| Auxiliary Engine- Rear Deck Crane Engine (Exact unit not defined) | Rental Engine | | In Use | Rule 202 D.5 |
| Incinerator | Team Tec OGS-2006 Serial No. 14913-01 | | Lock Out/Tag Out | |
| Boiler | Pyro Type E1129 | | In Use; Lock Out Fuel Supply | Electrically Powered |
| ROVs | Hydra Maximum & Hydra Millennium | | In Use | Electrically Powered Hydraulic Systems |

2.3 Cable Repair Activity Emission Factors: Emission factors and calculated emissions for each device and the cable repair activity engines listed Section 2.2 above are documented in Attachment “A” of this permit. The assumptions are based on engine specific data provided by the applicant and may be found in the administrative file for this permit.

2.4 Reasonable Worst Case Emission Scenario for the Cable Repair Activity: The following are the activity phases and assumptions used to calculate the permitted emissions for this activity:

Transit:

- Transit to and from the platform will take 12 hours each way, for a total of 24 hours of transit time.
- Vessel transit requires only two main engines, operated at a load of approximately 0.70.
- Auxiliary engines will not be used during transit.

Cable Repair:

- Cable repair operations are assumed to occur 24 hours/day for up to 13 days.
- The cable repair activities will generally require two main engines, with the possibility of a third engine during bad weather. Typical actual loads will be about 0.39.
- The emergency generator and survival craft engines will only be used for testing.

³ TC = Turbocharged, AC = Aftercooled, EC = Electronic Controls

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Transit and cable repair activities do not overlap, and the worst case emission scenario is based on the following assumptions in the application:

- Assume 24 hours/day main engine operation over the course of the activity.
- Assume three main engines in use for half of the cable repair activity (two for the entire activity).
- Assume a max load of 0.75 on the main engines at all times.

2.5 Supply Boat Emission Calculations: Revised emissions Tables 5.1 through 5.6 are attached to the permit. The table below lists what parameters are summed to calculate the permitted hourly, daily, quarterly, and annual supply boat emissions:

| Hourly | Daily | Quarterly | Annual |
|-------------------------|-------------------------|-------------------------|-------------------------|
| Main Engine - Spot Chtr | Main Engine - Spot Chtr | Main Engine - DPV | Main Engine - DPV |
| Generator Engine - DPV | Generator Engine - DPV | Main Engine - Spot Chtr | Main Engine - Spot Chtr |
| Winch - DPV | Bow Thruster - DPV | Generator Engine - DPV | Generator Engine - DPV |
| | Winch - DPV | Bow Thruster - DPV | Bow Thruster - DPV |
| | | Winch - DPV | Winch - DPV |

This table shows that the worst case hourly and daily emissions are based on main engine emissions from uncontrolled spot charter boats. The hourly emissions do not include the bow thruster emissions as it is assumed that the winch and bow thrusters would not be operation simultaneously for any complete hour. The quarterly and annual emissions are the sum of all five emission sources from supply boats.

2.6 Special Calculations: There are no special calculations.

2.7 BACT Analyses: Best Available Control Technology was not required for the cable repair activity.

2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the equipment is operated properly.

2.9 Monitoring, Recordkeeping, and Reporting Requirements: ExxonMobil is required to comply with an approved *Boat Monitoring and Reporting Plan* the conditions of this permit that require that the permit emissions be reported at the end of the cable repair activity and included in the Compliance Verification Reports for the Santa Ynez Unit project.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

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

- Rule 101. Compliance of Existing Facilities
- Rule 201. Permits Required**
- Rule 202. Exemptions to Rule 201
- Rule 205. Standards for Granting Permits
- Rule 302. Visible Emissions
- Rule 303. Nuisance
- Rule 309. Specific Contaminants
- Rule 310. Odorous Organic Sulfides

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- Rule 311. Sulfur Content of Fuels
- Rule 333. Control of Emissions from Reciprocating Internal Combustion Engines
- Rule 505. Breakdown Procedures
- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration

4.2 Rules Requiring Review:

4.2.1 *Rule 202 - Exemptions to Rule 201:* Section D.5 exempts temporary equipment where the projected actual aggregate emissions of all affected pollutants do not exceed 1 ton (except carbon monoxide, which shall not exceed 5 tons) and the use of each individual piece of equipment does not exceed one 60 day period in any consecutive 12 month period. See the table in Section 2.2 of this Permit Evaluation for specifics.

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

4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). There is no increase in daily or annual PTE due to the cable repair activity engines, and thus no increase in NEI.

5.0 AQIA

An AQIA was prepared by ExxonMobil and submitted in conjunction with the application. The results showed no air quality standard violations would occur due to the temporary cable repair activity.

6.0 OFFSETS/ERCs

6.1 Offsets: The *Exxon - SYU Project* stationary source requires emission offsets. Offsets are required for all permitted emissions at the onshore LFC processing plant and for all NEI increases that occurred on the OCS Platforms since being subject to the requirements of the OCS Air Regulation (40 CFR Part 55). The specific offset requirements for Platform Heritage are detailed in Table 7-1 for ROC and Table 7-2 for SO_x of Part 70/Permit to Permit to Operate 9102-R3 issued 05/22/06. As the cable vessel engines are limited to operate within the permitted emission limits, no additional offsets are required since there is no change in NEI. However, mitigation of cable repair emissions is necessary to satisfy CEQA requirements. See Section 8.0 below.

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

7.0 AIR TOXICS

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

8.0 CEQA / LEAD AGENCY

Santa Barbara County APCD is the CEQA lead agency for the ExxonMobil Cable C1 Repair Activity. The Technology and Environmental Assessment Division of the APCD prepared a Mitigated Negative Declaration pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15070 and the APCD Environmental Review Guidelines, adopted in October 1995 and revised in November 2000. Mitigation measures included the permit conditions and an agreement that ExxonMobil will

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deposit total mitigation funds in the amount of \$143,000 which the APCD will use to fund emission reduction projects totaling 10 tons of NO_x in Santa Barbara County.

The proposed Mitigated Negative Declaration was circulated for public review for a period of 30 days starting **June 2, 2008**. No comments were received and the document was finalized on **July x, 2008** and is included in the administrative file for this permit. The documents and other materials that constitute the record of proceedings upon which this decision is based are located at the Santa Barbara County APCD offices at 260 N. San Antonio Road, Suite A, Santa Barbara, CA 93110. The custodian of these materials is the APCD Permit Engineer for this activity.

CEQA Findings

The Santa Barbara County Air Pollution Control District Control Officer finds:

1. Revisions in the repair activity plans or proposals made by, or agreed to by the applicant before the proposed mitigated negative declaration and initial study were released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
2. There is no substantial evidence, in light of the whole record before the agency, that the repair activity as revised may have a significant effect on the environment.

Pursuant to CEQA Guidelines Section 15074, the Santa Barbara County Air Pollution Control District Control Officer has adopted the Final Mitigated Negative Declaration [together with any comments received during the public review process]. The MND reflects the independent judgment of the Control Officer and has been completed in compliance with CEQA, and is adequate for this proposal.

9.0 SCHOOL NOTIFICATION

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

10.0 PUBLIC and AGENCY NOTIFICATION PROCESS/COMMENTS ON DRAFT PERMIT

This repair activity was not subject to public notice. Comments from ExxonMobil and APCD responses are included in Attachment "B" of this Permit Evaluation.

11.0 FEE DETERMINATION

Fees for this permit are assessed under the cost reimbursement provisions of Rule 210.

12.0 RECOMMENDATION

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

Phil Sheehan
AQ Engineer

Date

Engineering Supervisor

Date

Attachment “A”

Cable Repair Activity Emission Calculations

Table 5.1: Operating Equipment Description
 ExxonMobil Cable C1 Repair Activity
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| Equipment Item | Description | | Device Specifications | | | | Usage Data | | | Maximum Operating Schedule | | | | References | |
|---|-------------|------------|-----------------------|----|--------|---------|------------|-------|------------|----------------------------|-----|-----|------|------------|--------------------|
| | | | Fuel | %S | Size | Units | Capacity | Units | Load | hr | day | qtr | year | | |
| Supply Boat - Cable Repair Vessel (CRP) | | | | | | | | | | | | | | | |
| | | Exxon ID # | APCD DeviceNo | | | | | | | | | | | | |
| | | | | D2 | 0.0015 | 2,533.4 | bhp | 0.055 | gal/bhp-hr | 0.75 | 1 | 24 | 305 | 305 | |
| | | | | D2 | 0.0015 | 2,533.4 | bhp | 0.055 | gal/bhp-hr | 0.75 | 1 | 24 | 305 | 305 | |
| | | | | D2 | 0.0015 | 2,533.4 | bhp | 0.055 | gal/bhp-hr | 0.75 | 1 | 24 | 120 | 120 | |
| | | | | D2 | 0.0015 | 2,533.4 | bhp | 0.055 | gal/bhp-hr | 0.00 | 0 | 0 | 0 | 0 | Locked Out |
| | | | | D2 | 0.0015 | 2,575 | bhp | 0.055 | gal/bhp-hr | 0.00 | 0 | 0 | 0 | 0 | Locked Out/Tag Out |
| | | | | D2 | 0.0015 | 543 | bhp | 0.055 | gal/bhp-hr | 0.65 | 0.5 | 0.5 | 2 | 2 | Test only |
| | | | | D2 | 0.0015 | 197 | bhp | 0.055 | gal/bhp-hr | 0.65 | 0.1 | 0.1 | 0.4 | 0.4 | Test only |

Table 5.2: Equipment Emission Factors
 ExxonMobil Cable C1 Repair Activity
 PTO Mod 9102 - 04

| Equipment Item | Description | | Emission Factors | | | | | | | Reference |
|---|-------------|---------------|------------------|-------|-------|-------|-------|-------|-------|--|
| | Exxon ID # | APCD DeviceNo | NOx | ROC | CO | SOx | PM | PM10 | Units | |
| Supply Boat - Cable Repair Vessel (CRP) | | | | | | | | | | |
| | | | 6.360 | 0.290 | 0.670 | 0.005 | 0.136 | 0.131 | | g/bhp-hr Engine Manufacturer Specification Sheets |
| | | | 6.360 | 0.290 | 0.670 | 0.005 | 0.136 | 0.131 | | g/bhp-hr Engine Manufacturer Specification Sheets |
| | | | 6.360 | 0.290 | 0.670 | 0.005 | 0.136 | 0.131 | | g/bhp-hr Engine Manufacturer Specification Sheets |
| | | | 6.360 | 0.290 | 0.670 | 0.005 | 0.136 | 0.131 | | g/bhp-hr Engine Manufacturer Specification Sheets |
| | | | 7.535 | 0.290 | 0.670 | 0.005 | 0.136 | 0.131 | | g/bhp-hr NOx provided by manufacturer, all other factors per Caterpillar engines |
| | | | 7.460 | 0.356 | 0.240 | 0.005 | 0.545 | 0.523 | | g/bhp-hr Converted to g/bhp-hr based on Vessel provided data |
| | | | 13.996 | 0.427 | 1.953 | 0.005 | 0.823 | 0.791 | | g/bhp-hr Standard Uncontrolled EF - see PTO 9102 |

Notes:

- ¹ For emission calculations and fuel use reporting, the main engines on dedicated project vessels are treated as controlled engines.
- ² For emission calculations and fuel use reporting, all spot charter vessels are treated as uncontrolled engines.

Table 5.3: Short-Term Emissions
 ExxonMobil Cable C1 Repair Activity
 PTO Mod 9102 - 04

| Equipment Item | Description | | NOx | | ROC | | CO | | SOx | | PM | | PM10 | | Federal Enforceability |
|---|-------------|------------------|--------------|-----------------|-------------|--------------|-------------|---------------|-------------|-------------|-------------|--------------|-------------|--------------|---------------------------|
| | Exxon ID # | APCD DeviceNo | lb/hr | lb/day | lb/hr | lb/day | lb/hr | lb/day | lb/hr | lb/day | lb/hr | lb/day | lb/hr | lb/day | |
| Supply Boat - Cable Repair Vessel (CRP) | | | | | | | | | | | | | | | |
| | | | 26.64 | 639.39 | 1.21 | 29.15 | 2.81 | 67.36 | 0.02 | 0.53 | 0.57 | 13.67 | 0.55 | 13.13 | |
| | | | 26.64 | 639.39 | 1.21 | 29.15 | 2.81 | 67.36 | 0.02 | 0.53 | 0.57 | 13.67 | 0.55 | 13.13 | |
| | | | 26.64 | 639.39 | 1.21 | 29.15 | 2.81 | 67.36 | 0.02 | 0.53 | 0.57 | 13.67 | 0.55 | 13.13 | |
| | | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| | | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| | | | 2.90 | 2.90 | 0.14 | 0.14 | 0.09 | 0.09 | 0.00 | 0.00 | 0.21 | 0.21 | 0.20 | 0.20 | |
| | | | 0.40 | 0.40 | 0.01 | 0.01 | 0.06 | 0.06 | 0.00 | 0.00 | 0.02 | 0.02 | 0.02 | 0.02 | |
| | | | 83.22 | 1,921.46 | 3.79 | 87.61 | 8.57 | 202.22 | 0.07 | 1.59 | 1.94 | 41.25 | 1.87 | 39.60 | |

Notes:

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

Table 5.4: Long-Term Emissions
 ExxonMobil Cable C1 Repair Activity
 PTO Mod 9102 - 04

| Equipment Item | Description | | NOx | | ROC | | CO | | SOx | | PM | | PM10 | | Federal Enforceability |
|---|-------------|------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|---------------------------|
| | Exxon ID # | APCD DeviceNo | TPQ | TPY | TPQ | TPY | TPQ | TPY | TPQ | TPY | TPQ | TPY | TPQ | TPY | |
| Supply Boat - Cable Repair Vessel (CRP) | | | | | | | | | | | | | | | |
| | | | 4.06 | 4.06 | 0.19 | 0.19 | 0.43 | 0.43 | 0.00 | 0.00 | 0.09 | 0.09 | 0.08 | 0.08 | |
| | | | 4.06 | 4.06 | 0.19 | 0.19 | 0.43 | 0.43 | 0.00 | 0.00 | 0.09 | 0.09 | 0.08 | 0.08 | |
| | | | 1.60 | 1.60 | 0.07 | 0.07 | 0.17 | 0.17 | 0.00 | 0.00 | 0.03 | 0.03 | 0.03 | 0.03 | |
| | | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| | | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| | | | 0.0029 | 0.0029 | 0.0001 | 0.0001 | 0.0001 | 0.0001 | 0.0000 | 0.0000 | 0.0002 | 0.0002 | 0.0002 | 0.0002 | |
| | | | 0.0001 | 0.0001 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | |
| | | | 9.73 | 9.73 | 0.44 | 0.44 | 1.02 | 1.02 | 0.01 | 0.01 | 0.21 | 0.21 | 0.20 | 0.20 | |

Notes:

FE = Federally enforceable

AE = APCD-only enforceable

NE = Not enforceable

**Table 5.5: Facility Potential to Emit
ExxonMobil Cable C1 Repair Activity
PTO Mod 9102 - 04**

A. Hourly

| Equipment Category | NOx | ROC | CO | SOx | PM | PM10 |
|---------------------------|------------|------------|-----------|------------|-----------|-------------|
| Cable Repair Activity | 83.22 | 3.79 | 8.57 | 0.07 | 1.94 | 1.87 |

B. Daily

| Equipment Category | NOx | ROC | CO | SOx | PM | PM10 |
|---------------------------|------------|------------|-----------|------------|-----------|-------------|
| Cable Repair Activity | 1,921.46 | 87.61 | 202.22 | 1.59 | 41.25 | 39.60 |

C. Quarterly

| Equipment Category | NOx | ROC | CO | SOx | PM | PM10 |
|---------------------------|------------|------------|-----------|------------|-----------|-------------|
| Cable Repair Activity | 9.73 | 0.44 | 1.02 | 0.01 | 0.21 | 0.20 |

D. Annual

| Equipment Category | NOx | ROC | CO | SOx | PM | PM10 |
|---------------------------|------------|------------|-----------|------------|-----------|-------------|
| Cable Repair Activity | 9.73 | 0.44 | 1.02 | 0.01 | 0.21 | 0.20 |

Attachment "B"

ExxonMobil Comments on the Draft Permit
and APCD Responses

1. PTO Condition C.1(b)(x) (Fuel Sulfur Limit) – The draft permit listed a limit of 0.0015 weight percent sulfur, the proposed permit lists 0.02 weight percent sulfur. This limit does not correspond with the current permit limit of 0.2 weight percent, or the limit used in the emission calculations of 0.0015 weight percent. We suggest that the weight percent sulfur be revised to be consistent with the tables (0.0015 weight percent).

APCD; Update made as requested.

2. PTO Conditions C.2, C.3, C.5 and C.8 – Term 'project' was not changed to 'repair activity' in text. For consistency, we request that the revised term be used. [You can reference our track change file to see the location of the requested changes.]

APCD; Changes made as requested.

3. Permit Evaluation – Section 1.1, Second paragraph, line 5: Text references 'Platform Hermosa' instead of 'Platform Heritage'. We request that the name be changed to Heritage. [Note that the email to EPA also referenced Hermosa in error.]

APCD; Correction made as requested.

4. Permit Evaluation – Section 2.0, First paragraph, line 6: Text has an 'of' that appears to be a typo. We request that the correction be made.

APCD; Correction made as requested.

5. Permit Evaluation – Section 8, Items 1 and 2 and Section 10: – Term 'project' was not changed to 'repair activity' in text. For consistency, we request that the revised term be used.

APCD; Changes made as requested.