

**UNITED STATES DEPARTMENT OF THE INTERIOR
MINERALS MANAGEMENT SERVICE
PACIFIC OCS REGION**

NTL No. 2010-P02

Effective Date: February 24, 2010
Expiration Date: February 23, 2015

**NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL AND GAS LEASES
IN THE PACIFIC OUTER CONTINENTAL SHELF REGION**

Standby Testing Requirements During Air Pollution Emergency Episodes

This Notice to Lessees and Operators (NTL) supersedes NTL No. 2003-P08.

In keeping with the Minerals Management Service (MMS) policy of safe and environmentally sound offshore operations, we are providing Pacific OCS Region (POCSR) operators with policy regarding potential air emission abatement measures. Though this NTL will only come into play during emergency health events that have become very infrequent, it would be prudent to continue to plan ahead for such events. The events are usually of very limited duration (2-3 days) and the NTL states that standby equipment testing should be delayed until after the event, so as not to exacerbate an existing emergency situation. No other change in operations beyond the postponement of standby equipment testing is indicated during these exceptional events.

The local air agencies require planning actions to reduce the emissions of air contaminants from stationary sources during exceptional air pollution events. This is in response to emission abatement measures required by the State of California, as administered by the local air agencies to protect public health in the advent of a second- or third-stage emission episode. The POCSR operators are required to develop emission abatement measures to reduce emissions when episodes are predicted or attained. These measures are included in "Emergency Action Plans" as submitted to local air quality agencies subject to approval by the Air Pollution Control Officer.

The MMS provides for the suspension of certain testing requirements for standby equipment during these emergency health episodes. The suspension allows POCSR operators the ability to curtail stationary source emissions during the testing of standby equipment and pressure safety relief valves within your facilities according to the measures contained in your required emergency abatement plans. Standby equipment is defined in relation to emergency emission episodes as equipment which is only operated in a temporary or emergency mode. The MMS will suspend any testing of standby equipment and safety relief valves as required by us for the duration of second- and third-stage emergency episodes to reduce public exposure to unhealthy air pollution concentrations.

The MMS authorizes pre-approval for you to delay the subject testing described in the emission abatement measures you submit to the air agencies. This delay in testing will be in effect for the duration of the emergency episode. We authorize this pre-approval if POCSR operators who are

required to submit the subject Emergency Action Plans to the local air quality agencies also provide us with a copy of the subject plan. We can then address any safety concerns with the proposed abatement measures prior to the event of an air pollution episode to ensure that such abatement measures do not jeopardize safe platform operations.

The POCSR operators should take air quality conditions into consideration when finalizing schedules for equipment testing. Most MMS testing requirements allow for flexibility within the prescribed time frames, so operators should be able to meet those requirements without suspension/postponement. The MMS believes it to be the responsibility of the operators to meet such requirements.

Guidance Document Statement

The MMS issues NTL's as guidance documents in accordance with 30 CFR 250.103 to clarify, supplement, and provide more detail about certain MMS regulatory requirements and to outline the information you provide in your various submittals. Under that authority, this NTL sets forth a policy on and an interpretation of a regulatory requirement that provides a clear and consistent approach to complying with that requirement. However, if you wish to use an alternate approach for compliance, you may do so, after you receive approval from the appropriate MMS office under 30 CFR 250.141.

Paperwork Reduction Act of 1995 Statement

The collection of information referred to in this NTL is intended to provide clarification, description, or interpretation of requirements contained in 30 CFR 250, Subpart C, Pollution Prevention and Control. The Office of Management and Budget (OMB) approved the information collection requirements in these regulations under OMB Control Number 1010-0057. This NTL does not impose any additional information collection requirements subject to the Paperwork Reduction Act of 1995.

Contact

If you have any questions or need clarification regarding this NTL, please contact the California District Manager at (805) 389-7560.


Ellen G. Aronson
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Pacific OCS Region

2.24.10
Date