



Shell Exploration & Production

Richard Albright
OCS/PSD Air Quality Permits
U.S EPA- Region 10. AWT-107
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August 6, 2012

Re: Shell OCS Exploration Program
***Discoverer* PSD Permit Revision**
***Nanuq* PM Emissions Rate**

Dear Mr. Albright,

On June 28, 2012, Shell Gulf of Mexico, Inc. (Shell) submitted an application to revise Outer Continental Shelf Prevention of Significant Deterioration Permit to Construct No. R10OCS/PSD-AK-09-01. In addition to other requests, Shell requested that EPA revise the aggregate daily PM₁₀ and PM_{2.5} mass emissions limits that apply to the Nanuq oil spill response vessel. Shell based its request on emissions testing of the Nanuq that took place in March 2012 that revealed higher particulate matter emissions than expected.

As discussed in the June 28 application, Shell retained engine and control equipment experts to evaluate the Nanuq particulate matter emissions issue. Based on that evaluation, several changes were made that are documented in our application. A second round of emissions testing of Nanuq propulsion and generator engines was conducted between June 21 and June 27, 2012.

A complete source test report for this additional testing was submitted to the Environmental Protection Agency on July 27, 2012. Shell's review of the new test results indicates a lower aggregate emission factor than what had previously been proposed is appropriate, given the daily fuel allowance that applies to the oil spill response vessel. Shell now proposes that the aggregate particulate matter emission limits in permit conditions Q.4.1.1 and Q.4.1.2 be revised from 3.03 to 10 pounds per day.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this submission are true, accurate, and complete. Please contact Pauline Ruddy (907-771-7243) or Chris Lindsey (907-771-7262) if you have any questions about this information.

Thank you,

A handwritten signature in blue ink that reads "Susan Childs".

Susan Childs
Alaska Venture Support Integrator, Manager

Cc:

Dave Bray, EPA Region 10 (via e-mail)
Natasha Greaves, EPA Region 10 (via e-mail) ■ Pauline Ruddy, Shell (via e-mail)
Lance Tolson, Shell (via e-mail) ■ Chris Lindsey, Shell (via e-mail)
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