

Francisco Vacas
Eni US Operating Company Incorporated
Two Allen Center
1200 Smith Street, Suite 1700
Houston, Texas 77002

Subject: Modification of Holy Cross Prospect Drilling Project
OCS Permit OCS-EPA-R4007-M2

Dear Mr. Vacas:

This letter is in response to your request for a minor permit modification for the Eni US Operating Company Incorporated (Eni) Holy Cross Prospect Drilling Project, which was received by the U.S. Environmental Protection Agency on April 4, 2014. The EPA previously issued Eni an Outer Continental Shelf (OCS) air quality permit on November 28, 2011, a permit modification on May 11, 2012, and on September 19, 2013, granted a permit extension request to construct and operate a temporary emissions source at an exploratory drilling operation on Lloyd Ridge OCS lease block 411 in the Gulf of Mexico approximately 154 miles southeast of the mouth of the Mississippi River and 189 miles south of the nearest Florida coast.

Eni requests the permit be amended to include welding operations, painting operations, a revision of permit condition 6.8.1.1.2.2 to accurately reflect detectable monitoring parameters, and a change to Eni's address. The drilling activity will use only the previously permitted drill ship, *Pathfinder*, and associated work boats. The addition of routine welding and painting operations will result in 0.65 tons per year of VOC; 0.02 tons per year of particulate matter (PM), particulate matter with an aerodynamic diameter less than 2.5 microns (PM_{2.5}), and particulate matter with an aerodynamic diameter less than 10 microns (PM₁₀); and 0.07 tons per year of hazardous air pollutants. The welding and painting operations are required maintenance activities and will not trigger any additional requirements. The proposed rewording of condition 6.8.1.1.2.2 reflects recent changes to the Diesel Emissions with Turbochargers (DEWT) system and current detectable parameters.

The applicant provided emission calculations for the welding and painting operations, a best available control technology analysis for these operations, a review of potentially applicable requirements, and a comparison to Eni's previous air quality analysis. The emission calculations in the application include calculations for particulate matter emitted during painting. However, the EPA has determined that since Eni will use a roller or brush for painting, no emissions will become atomized, and therefore, the painting operations will not emit particulate matter. EPA has included the updated PM/PM₁₀/PM_{2.5} tons per year emissions above. The application also includes a description of the changes that have been made to the DEWT system. This condition is not intended for compliance purposes, and was written to determine the long-term effectiveness of the Transocean DEWT monitoring system. The applicant provided title V part 71 permit forms, and updated their address.

The EPA has reviewed the request submitted by Eni, and determined that these changes do not result in a major modification under title V and do not trigger Prevention of Significant Deterioration review for any New Source Review regulated pollutants. The EPA has determined that the requested revisions do not constitute a significant change from the original permit, nor a change in the environmental impact of the project. The change in the company's address constitutes a title V administrative amendment.

After consideration of the request submitted by Eni and pertinent federal statutes and regulations, the EPA hereby grants these requests pursuant to the terms and conditions of the revised permit, OCS-EPA-R4007-M2, for the Holy Cross Prospect Drilling Project. The EPA modified the permit to include welding and painting operations, and added these units to Table 1 of the permit for descriptive and identification purposes. The EPA updated condition 6.8.1.1.2.2 to reflect the current DEWT system capabilities. In addition, the EPA has changed Eni's address and updated the EPA contact names and numbers. These changes can be identified in the enclosed mark-up version.

In accordance with the provisions of Section 328 of the Clean Air Act (CAA), 42 U.S.C. § 7627, and the implementing OCS Air Regulations at Title 40 Code of Federal Regulation (CFR) part 55, the EPA has revised the permit to include the minor and administrative amendments. The revised permit, OCS-EPA-R4007-M3, is enclosed. If you have any questions, please contact Ms. Eva Land at 404-562-9103, or Kelly Fortin at 404-562-9117.

Sincerely,

Heather M. Ceron
Chief
Air Permits Section

Enclosures

cc: Ms. Victoria Gerber, Eni US Operating Company Inc.
Mr. Rahul Pendse, Trinity Consultants