

AIR POLLUTION CONTROL DISTRICT
REGULATORY COMPLIANCE DIVISION

POLICIES AND PROCEDURES

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Topic: Inspection of Specific Source Categories - Marine Vessels

Distribution: All Policy Holders

Marine vessels covered by this policy are the crew and supply boats which service the offshore platforms, both in State waters and in the OCS and those which service marine terminals.

The rationale for inspecting vessels is to confirm whether all required emission controls and automated data acquisition systems have been installed and are operating as specified in the ATC or PTO. These controls/data acquisition systems are used to provide/verify either emission offsets or required project offset liability.

Emission controls for vessels include may both modifications to the main engines and operational restrictions. For crew boats, a 40 engine timing retard, turbocharging and intercooling constitute the engine modifications. For supply boats, additional engine modifications include a separate enhanced intercooling circuit. Certain vessel engines such as the CAT D399TASC meet these control requirements when delivered from the factory and do not require field modifications. Operational restrictions involve speed reduction and reductions in the number of vessel trips. For a more detailed description of emission and operational control measures, please refer to the District/ADL document "Crew and Supply Boat NO_x Control Development Program (June 1987)".

Automated data acquisition systems record information needed to calculate emissions and to verify vessel operational restrictions. The parameters which are commonly recorded include hourly fuel use, engine RPM, speed, location, date and time. The District has issued a draft vessel data reporting protocol which specifies the format and type of information which has to be collected. Refer to this protocol for further detail.

Because the requirements imposed on vessels depend upon the specific permit condition(s) and because access to vessels has to be arranged in advance, the project manager is responsible for requesting and scheduling inspections. Requests for a District inspection will be forwarded to the Permit Compliance Section Supervisor, who will in turn forward the request to the appropriate Enforcement Supervisor. Prior to conducting the inspection, the project manager should prepare an inspection list of items to be covered. The inspector's supervisor will provide the inspector with the Request for Inspection and ensure that the specific tasks are understood and that any necessary instrumentation and inspection checklists are prepared prior to the inspection.

An inspection report will be prepared after the inspection has been conducted. The report should include a explanation of the reason for the inspection, the results of the inspection and recommendations. If violations of permit conditions or District rules are detected, Policies and Procedures VII.A., "Enforcement Actions - the Notice of Violation", will be followed.