# Tips to Avoid Common Emissions Spreadsheet Errors

These tips are provided to assist you in avoiding common air quality reporting errors and thus facilitate the quickest possible review of your plan:

1. Review the instruction documents for BOEMRE Forms 0138 and 0139, prior to using the DOCD or EP spreadsheets. Review the instructions documents regularly to check for updates.

2. The emissions estimates should be based on and reflect the activity description and schedule required as part of the plan.

3. The emissions calculations are required to be worst-case estimates for the facility.

4. Actual emission factors and actual equipment horsepower should be used whenever they are known. If the drilling rig is not known, the maximum horsepower rating for the type of rig (jack-up, submersible, platform, barge, semi-submersible, or drillship) must be used. If actual emissions factors are unavailable, average emission factors may be used. Average emission factors may not be used if it is known that the equipment involved emits at a rate greater than the average. Default average emission factors are provided in the spreadsheets.

5. Equipment should be shown as running 24 hours a day, 365 days a year, unless you provide documentation with the plan certifying an alternative to the maximum activity for the equipment. You must also provide a quantifiable method of verifying compliance with this alternative maximum activity limit. For example, verification can be achieved by maintaining a log of the actual fuel used by a piece of equipment, or by maintaining a log of the actual hours a piece of equipment was used. These certifications and verifications must be in writing. The documentation or certifications must be included in the plan. The verifications must be documented at least monthly and a copy must be maintained at the facility involved. Additionally, copies of these verifications must be provided to BOEMRE employees upon request or as directed by the Regional Supervisor.

6. Emissions from all vessels directly related to the proposed activity must be included for the duration of their activity within 25 miles of the facility. This typically includes crew boats, supply boats, work boats, tug boats, anchor handling vessels, lift boats, pile drivers, standby boats, construction barges/vessels, etc.

7. The default marine vessel fuel sulfur concentration can be revised to the anticipated marine vessel fuel sulfur concentration on the vessel factors tab of both the DOCD and EP spreadsheets. If the fuel sulfur concentration is not known, the default value of 500 ppm should be used for activities that occur in 2012. For activities after 2012, the fuel sulfur concentration for marine vessel diesel fuel should be 15 ppm.

8. Emissions from the construction of lease term pipelines must be attributed to the facility from which the product it carries originates. For gas lift pipelines, the construction emissions for the pipeline are attributed to the well which is produced using the lift gas, in other words, the well to which the lift gas flows.

9. If the production is first processed at the receiving (terminus) platform of a lease term pipeline, the incremental increase in emissions at the receiving facility will also be included in the spreadsheets covering the producing well.

10. Emissions associated with workovers, recompletions, equipment swapouts, etc. must be included in spreadsheets for DOCDs. For workovers and recompletions, a few weeks of drilling allotted to future years precludes the need for a revised DOCD each time you need to work over a well.

11. For any plan involving subsequent activity at an existing facility, emissions data must be provided for the proposed activity and for the facility total (proposed plus existing emissions). This should be depicted in two separate and clearly labeled sets of spreadsheets.

12. If platforms are bridge connected, they are considered to be one facility for air quality purposes, and development plans must include the emissions from all of the connected platforms as one facility. Each structure should have its own set of spreadsheets, but remember it is the total for the facility which is used for determining exemption or significance.

13. For purposes of calculating the BOEMRE exemption level, the distance to shore should be expressed in tenths of a statute mile up to 20 miles, and in whole statute miles for distances beyond 20 miles. The nearest point of any land should be used. This is defined as the distance from the facility to the mean high water mark of any State, including barrier islands and shoals.

14. Verification of non-default emission factors: documentation is required for any emission factor below the defaults included in the spreadsheets. Verification (typically by stack-testing) of these reduced emission factors will also be required upon start-up and occasionally thereafter to prove that the reduced emission factors are actually being achieved and maintained.

15. Emission reductions: describe any proposed emission reduction measures, including a description of the affected source(s), the emission reduction control technologies or procedures, quantity of reductions to be achieved, and the monitoring system you propose to use to measure emissions.

16. Include fugitive emissions for DOCDs.

17. If the activity includes a boom for emergency use, be sure to include a description of its usage in your description of equipment and processes. Indicate whether it will be used as a vent or flare and the conditions under which it will be used (e.g., compressor downtime, equipment upset, accident). Include estimates of flaring or venting in the spreadsheets.

18. If the activity includes compressor(s), indicate intended action during compressor downtime (e.g., shut-in, flare, vent).

19. If the activity includes a continuous flare, describe why it is needed (e.g., to incinerate harmful levels of H2S).

20. If the activity includes a glycol reboiler that is operated using waste heat or electricity, indicate this in a statement.

21. If H2S is expected, indicate the expected concentration.

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