



Form PSD-2104

Deferral for Pipelines with Existing Best Available Technology

Under 19 California Code of Regulations (CCR) Section 2104, an operator may request a “deferral” from the OSFM by proving that their existing pipeline is currently equipped with the best available technology. An operator must show that installed technology meets CBAT requirements through the submission of a risk analysis. This form provides general guidelines an operator may use to submit necessary information to satisfy Section 2104. Using the form PSD-2104 is optional, an operator may submit the required information in another format.

Name of Pipeline Operator:								
OSFM Pipeline ID number:								
Product(s) normally transported:								
Diameter of Subject Pipeline:								
MOP of subject pipeline:								
Contact person:								
Mailing address:								
City:		State:		Zip:				
Email:		Phone:						
Do you wish to request confidential treatment of your risk analysis and plan(s)?							Yes	No ¹

Agent/contractor (if applicable)

Name of Contractor:		Contact person:	
Email:		Phone:	

Best Available Technology(ies)

According to 19 CCR Section 2100(a)(2), Best Available Technology (BAT) means technology that provides the greatest degree of protection by limiting the quantity of release in the event of a spill, taking into consideration whether the processes are currently in use and could be purchased anywhere in the world.

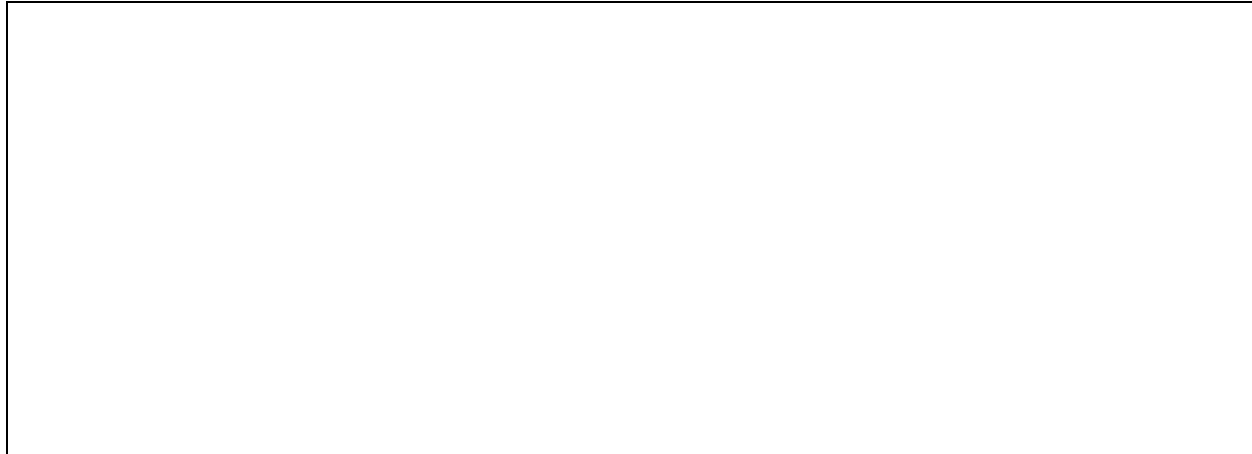
Provide a list of BAT(s) including the location(s) of the BAT(s) installed on the subject pipeline. Briefly describe how each BAT limits the quantity of release in the event of a spill.

¹ Operator shall review the additional submission requirements under Section 2119(b).

Vicinity Map

Provide a map or multiple maps (for multiple Environmentally and Ecologically Sensitive Areas [EESAs]) of the subject pipeline near EESA(s). Provide a brief description (e.g. distance from the coastal zone) and highlight the following feature(s) on the map (if applicable):

- Any physical geographic features such as soil and terrain, or drainage systems such as small streams and other smaller waterways, that could serve as a conduit to an EESA.
- Potential natural forces inherent in the area.
- Any natural and manmade barriers.
- Potential physical pathways between the pipeline and EESA(s).
- Any physical feature or peculiarity of local geography that call for special precautionary measures because they may affect an EESA.



Summary of Risk Analysis

19 CCR Section 2109 states that BAT includes, but is not limited to, the installation of leak detection technology (LDT), automatic shutoff systems (ASOS), remote controlled sectionalized block valves (MOV), Emergency Flow Restriction Devices (EFRDs), or any combination of these technologies.

Provide the results of risk analysis for each type of BAT. If you identify another technology as the BAT, please identify and describe the other technology, explain how this technology limits the quantity of release in the event of a spill, and provide the reasonable worst-case discharge volume for other technology used.

	Existing	LDT	ASOS	MOV	EFRD	Other
Maximum leak detection time, hours						
Maximum shut-down response time, hours						
Maximum flow rate, barrels/hour						
Drain down volume, barrels						
Reasonable worst-case discharge volume, barrels						

Provide the maximum historic discharge of the subject pipeline (if applicable) adjusted for any subsequent corrective or preventive action taken.

	Value
Maximum historic discharge, barrels	

For fields that are not applicable, please enter N/A and explain below:

Justification(s) of Section 2104 Deferral Request

Identify the current BAT(s) installed on the subject pipeline and justify why the BAT(s) listed in Section 2109 won't significantly reduce the quantity of release in the event of a spill.

If the Best Available Technology (BAT) deferral is granted, the operator shall update the risk analysis and resubmit it to the OSFM for review once every 5 years from the date of the most recent Letter of Acceptance.

I certify, to the best of my knowledge and belief, under penalty of perjury under the laws of the State of California, that the information contained in this risk analysis is true and correct.

Signature	Printed Name, Title	Date

For Office Use Only

Received On	Received by	Reviewed by	Status (Circle One)
			Approved Denied