ROUTING RECORD

DATE	FROM	TO	ACTION
JAN 20 2011	RGC	CSB	TV Rev - XP
APR 12 2011	RGC	GT	EPA Review
5/31/11	CSB	RGC	FP update
AUG 12 2011	RGC	MV	FP Rev
05/02/2012	MV	RGC	FP Rev.
AUG 10 2012	RGC	PS	TV Rev

REFERENCE TO OTHER APCD RECORDS INCLUDING VARIANCES

See Master A/512840

For 517838-42

APPL # 517837
I.D. # 166073

BETA OFF SHORE
OCS LEASE PARCELS P300/P301
HUNTINGTON BEACH
TITLE V ADMIN OR AMENDMENT

Date: 01/18/11

BETA OFF SHORE
TITLE V ADMIN OR AMENDMENT

AP 517837
ID 166073

XPP

South Coast Air Quality Management District

Form 400-A

Application Form for Permit or Plan Approval

List only one piece of equipment or process per form.

AQMD

Mail To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765-0944

Tel: (909) 396-3385
www.aqmd.gov

Section A - Operator Information

1. Facility Name (Business Name of Operator to Appear on the Permit): Beta Offshore - Beta OCS Platforms Facility

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 166073

3. Owner's Business Name (If different from Business Name of Operator):

Section B - Equipment Location Address

4. Equipment Location Is: (●) Fixed Location ( ) Various Location
(For equipment operated at various locations, provide address of initial site.)

OCS Lease Parcels P300/P301 (Federal Waters)
Street Address

, CA
City Zip

Marina Robertson — HSE Manager
Contact Name — Title

(562) 628-1526 — (562) 628-1536
Phone # Ext. Fax #

E-Mail: mrobertson@betaoffshore.com

Section C - Permit Mailing Address

5. Permit and Correspondence Information:
☐ Check here if same as equipment location address

111 West Ocean Blvd., Ste. 1240
Address

Long Beach, CA 90802
City State Zip

Marina Robertson — HSE Manager
Contact Name — Title

(562) 628-1526 — (562) 628-1536
Phone # Ext. Fax #

E-Mail: mrobertson@betaoffshore.com

Section D - Application Type

6. The Facility Is: ( ) Not In RECLAIM or Title V ( ) In RECLAIM ( ) In Title V (●) In RECLAIM & Title V Programs

7. Reason for Submitting Application (Select only ONE):

7a. New Equipment or Process Application:
- ( ) New Construction (Permit to Construct)
- ( ) Equipment On-Site But Not Constructed or Operational
- ( ) Equipment Operating Without A Permit *
- ( ) Compliance Plan
- ( ) Registration/Certification
- ( ) Streamlined Standard Permit

7b. Facility Permits:
- (●) Title V Application or Amendment (Also submit Form 500-A1)
- ( ) RECLAIM Facility Permit Amendment

80 76

7c. Equipment or Process with an Existing/Previous Application or Permit:
- ( ) Administrative Change
- ( ) Alteration/Modification
- ( ) Alteration/Modification without Prior Approval *
- ( ) Change of Condition
- ( ) Change of Condition without Prior Approval *
- ( ) Change of Location
- ( ) Change of Location without Prior Approval *
- ( ) Equipment Operating with an Expired/Inactive Permit *

Existing or Previous Permit/Application
If you checked any of the items in 7c., you MUST provide an existing Permit or Application Number:

* A Higher Permit Processing Fee and additional Annual Operating Fees (up to 3 full years) may apply (Rule 301(c)(1)(D)(i)).

8a. Estimated Start Date of Construction (mm/dd/yyyy): 02/01/2011

8b. Estimated End Date of Construction (mm/dd/yyyy): 03/31/2010

8c. Estimated Start Date of Operation (mm/dd/yyyy): 04/01/2010

9. Description of Equipment or Reason for Compliance Plan (list applicable rule): Amend RECLAIM / Title V Permit to reflect permits to install diesel oxidation catalysts on five IC engines to reduce VOC emissions.

10. For Identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each equipment / process)

11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are $500,000 or less OR a not-for-profit training center) (●) No ( ) Yes

12. Has a Notice of Violation (NOV) or a Notice to Comply (NC) been issued for this equipment? (●) No ( ) Yes
If Yes, provide NOV/NC#:

Section E - Facility Business Information

13. What type of business is being conducted at this equipment location?

14. What is your business primary NAICS Code? (North American Industrial Classification System) 211111

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? ( ) No (●) Yes

16. Are there any schools (K-12) within 1000 feet of the facility property line? (●) No ( ) Yes

Section F - Authorization/Signature

I hereby certify that all information contained herein and information submitted with this application are true and correct.

17. Signature of Responsible Official: [signature]

18. Title of Responsible Official: VP and COO

19. I wish to review the permit prior to issuance. (This may cause a delay in the application process.) ( ) No (●) Yes

20. Print Name: Steve Liles

21. Date: 12-28-10

22. Do you claim confidentiality of data? (If Yes, see instructions.) (●) No ( ) Yes

23. Check List: ☒ Authorized Signature/Date ☒ Form 400-CEQA ☒ Supplemental Form(s) (ie., Form 400-E-xx) ☒ Fees Enclosed

AQMD USE ONLY	APPLICATION TRACKING #	CHECK #	AMOUNT RECEIVED	PAYMENT TRACKING #	VALIDATION
		3267	$ 12,719.72	93013-91831	1/11/11 [initials] 1/19/11

DATE	APP REJ	DATE	APP REJ	CLASS I III	BASIC CONTROL	EQUIPMENT CATEGORY CODE	TEAM	ENGINEER	REASON/ACTION TAKEN
A							0	GSB	

© South Coast Air Quality Management District, Form 400-A (2009.04)

517837 [initials] 2/8/11 3/17/11

TYPE 85 555009

Reclaim/T-F Facility Permit Amend

1/6 [initials] $1723.07

SCAQMD PERMIT PROCESSING SYSTEM (PPS)

FEE DATA - SUMMARY SHEET

Application No :	517837	IRS/SS No:	
Previous Application No:		Previous Permit No:	

Company Name :	BETA OFFSHORE	Facility ID:	166073
Equipment Street:	OCS LEASE PARCELS P300/P301 , HUNTINGTON BEACH CA 92648		
Equipment Desc :	FACILITY PERMIT AMEND-RECLAIM/TITLE V		
Equipment Type :	BASIC	Fee Charged by:	B-CAT
B-CAT NO. :	555009	C-CAT NO: 00	Fee Schedule: C
Facility Zone :	18	Deemed Compl. Date: 2/17/2011	Public Notice: NO

32

Evaluation Type :	RECLAIM/TITLE V MINOR PERMIT REVISION	Small Business:	☐
Disposition :	Approve RECLAIM Revision, Recommended by Engineer	Higher Fees for Failing to Obtain a Permit:	☐
Lead Appl. No :		Identical Permit Unit:	☐

Air quality Analysis			$0.00	Filing Fee Paid:	$0.00
E.I.R			$0.00	Permit Processing Fee Paid:	$1,723.07
Health Risk Assessment			$0.00	Permit Processing Fee Calculated*:	$1,723.07
Public Notice Preparation Fee			$0.00		
Public Notice Publication Fee			$0.00	Permit Processing Fee Adjustment:	$0.00
Expedited Processing	Hours:	0.00	$0.00		
Source Test Review	Hours:	0.00	$0.00		
Time & Material	Hours:	0.00	$0.00		
				Total Additional Fee:	$0.00
				Additional Charge:	$0.00

COMMENTS:

RECOMMENDED BY: MARIA VIBAL DATE: 07/31/2012

REVIEWED BY: _____ DATE: AUG 10 2012

* ADJUSTED FOR SMALL BUSINESS, IDENTICAL EQUIPMENT AND P/O NO P/C PENALTY

SCAQMD PERMIT PROCESSING SYSTEM (PPS)

FEE DATA - SUMMARY SHEET

Application No : 517837 IRS/SS No:

Previous Application No: Previous Permit No:

Company Name : BETA OFF SHORE Facility ID: 166073

Equipment Street: OCS LEASE PARCELS P300/P301 , HUNTINGTON BEACH CA 92648

Equipment Desc : FACILITY PERMIT AMEND-RECLAIM/TITLE V

Equipment Type : BASIC Fee Charged by: B-CAT

B-CAT NO. : 555009 C-CAT NO: 00 Fee Schedule: C

Facility Zone : 18 Deemed Compl. Date: 2/17/2011 Public Notice: NO

Evaluation Type : RECLAIM/TITLE V MINOR PERMIT REVISION Small Business: ☐

Disposition : Approve RECLAIM Revision, Recommended by Engineer Higher Fees for Failing to Obtain a Permit: ☐

Lead Appl. No : Identical Permit Unit: ☐

Air quality Analysis			$0.00	Filing Fee Paid:	$0.00
E.I.R			$0.00	Permit Processing Fee Paid:	$1,723.07
Health Risk Assessment			$0.00	Permit Processing Fee Calculated*:	$1,723.07
Significant Project			$0.00	Permit Processing Fee Adjustment:	$0.00
Expedited Processing	Hours:	0.00	$0.00		
Source Test Review	Hours:	0.00	$0.00		
Time & Material	Hours:	0.00	$0.00		
				Total Additional Fee:	$0.00
				Additional Charge:	$0.00

COMMENTS:

RECOMMENDED BY: C S BHATT DATE: 05/31/2011

REVIEWED BY:_____ DATE:_____

* ADJUSTED FOR SMALL BUSINESS, IDENTICAL EQUIPMENT AND P/O NO P/C PENALTY

N S R D A T A S U M M A R Y S H E E T

Application No:	517837
Application Type:	RECLAIM/Title V Minor Permit Revision
Application Status:	PENDAPPRV
Previous Apps,Dev,Permit #:	NONE

Company Name:	BETA OFFSHORE
Company ID:	166073
Address:	OCS LEASE PARCELS P300/P301,HUNTINGTON BEA
RECLAIM:	NOX
RECLAIM Zone:	01
Air Basin:	SC
Zone:	18
Title V:	YES

Device ID:	0 -
Estimated Completion Date:	
Heat Input Capacity:	0 Million BTU/hr
Priority Reserve:	NONE - No Priority Access Requested
Recommended Disposition:	32 - BANKING/ PLAN GRANTED
PR Expiration:	
School Within 1000 Feet:	NO
Operating Weeks Per Year:	52
Operating Days Per Week:	5
Monday Operating Hours:	08:00 to 16:00
Tuesday Operating Hours:	08:00 to 16:00
Wednesday Operating Hours:	08:00 to 16:00
Thursday Operating Hours:	08:00 to 16:00
Friday Operating Hours:	08:00 to 16:00
Saturday Operating Hours:	00:00 to 00:00
Sunday Operating Hours:	00:00 to 00:00

Emittant:	NOX
BACT:	
Cost Effectiveness:	NO
Source Type:	MAJOR
Emis Increase:	0
Modeling:	N/A
Public Notice:	N/A
CONTROLLED EMISSION	
Max Hourly:	0 lbs/hr
Max Daily:	0 lbs/day
UNCONTROLLED EMISSION	
Max Hourly:	0 lbs/hr
Max Daily:	0 lbs/day
CURRENT EMISSION	
BACT 30 days Avg:	0 lbs/day
Annual Emission:	0 lbs/yr
District Exemption:	None

SUPERVISOR'S APPROVAL: _____ SUPERVISOR'S REVIEW DATE: _____

Processed By: mvibal 7/31/2012 3:14:06 PM

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING AND COMPLIANCE

M E M O R A N D U M

Date: September 26, 2012

To: Application File

From: Maria Vibal

Subject: Issuance of Permit Applications
Beta Offshore (Fac. ID 166073)

09/21/2012 Based on the permitting guidance provided by Sr. Engr. Rob Castro and Air Quality Analysis and Compliance Supervisor Gary Turner, the actions stated below will be completed on the following permit applications :

Appl. No.	RECLAIM/TV Appl.	Appl. Type	Action
517838-42	517837	C/O, P/C's Issued	Convert to P/O's; incorporate in RECLAIM/TV appl. 517837.
517837	-	RECLAIM/TV Mod.	Disposition; don't issue.
519178	-	Rule 1110.2 I&M Plan	Process; incorporate in RECLAIM/TV appl. 531454 as admin. revision.
531455	531454	Ch. of condition	Process as PC/PO; incorporate in RECLAIM/TV appl. 531454.
531454	-	RECLAIM/TV Mod.	Process as minor revision w/ EPA review.
533629-32, 533634-36	533625	Ch. of condition	Process as PC/PO, correction on condition C1:3; incorporate in RECLAIM/TV appl. 531454 as admin. revision.

Note : Change of condition A/N's 533629-32, 533634-36 supersede A/N's 517838-42.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING AND COMPLIANCE

MEMORANDUM

Date: July 30, 2012

To: Rob Castro, Senior Air Quality Engineer

From: Maria Vibal

Subject: Approval of RECLAIM/Title V Facility Permit 517837
Beta Offshore (ID 166073)

A/N 517837 covers the applications to modify the facility's existing crane diesel-fueled engines by installing diesel oxidation catalysts to comply with the Rule 1110.2 requirements of 250 ppmvd VOC and 2000 ppmvd of CO, both measured at 15% O_2. The modification applications are : 517838, 517839, 517840, 517841 and 517842.

Permits to Construct were issued on the referenced applications and the proposed RECLAIM/Title V facility permit sent to EPA on April 12, 2011 for the 45-day review. The District did not receive any comments from EPA on the proposal in A/N 517837.

Construction and performance testing of the crane engines were completed in 2011. The crane engine permits to construct are recommended for permits to operate. Upon approval of the permits to operate, the crane engine permits will be incorporated in the RECLAIM/Title V facility permit 517837. Per consultation with Sr. Engr. Rob Castro, A/N 517837 will be dispositioned for approval, but not formally issued. All changes will be incorporated in the facility permit revision A/N 531454 which is due to be issued.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING AND COMPLIANCE

MEMORANDUM

Date: July 30, 2012

To: Rob Castro, Senior Air Quality Engineer

From: Maria Vibal

Subject: P/C to P/O – A/N's 517838, 517839, 517840, 517841 and 517842

Objective: Applications are for modification of existing crane diesel-fueled engines by installing diesel oxidation catalysts to comply with the Rule 1110.2 requirements of 250 ppmvd VOC and 2000 ppmvd of CO, both measured at 15% O_2.

Highlights of Findings :

1. The referenced applications were issued Permits to Construct (PC) in June, 2011.
2. Beta Offshore completed the installation of the diesel oxidation catalysts on the crane engines in the first half of 2011.
3. Almega Environmental and Technical Services conducted source tests on the engines right after the completion of the retrofits. The tests were conducted in August-September, 2011.
4. Beta Offshore submitted the test report on the five crane engines to SCAQMD on Oct. 12, 2011. Report shows that all five engines comply with the Rule 1110.2 limits of 250 ppmvd VOC and 2000 ppmvd of CO, both measured at 15% O_2.
5. Source Test Engineering reviewed the test report and deemed it " acceptable" on April 27, 2012.

Recommendations : Disposition the referenced applications as P/O's and incorporate the updates in the RECLAIM Title V facility permit 517837/531454.

previously PERL 151178

South Coast Air Quality Management District

Run Date : 09/06/2011 08:07 AM

Facility Equipment List Report

Facility: 166073 BETA OFF SHORE
Last Inspection:
SIC: 1311
Inspector:
Inspection Date:

MR:
TS: TS-01 Cycle I RECLAIM/Title V F
Facility Status: Active
Assignment No.
Disposition:

Contact: MARINA ROBERTSON (562) 6281526
Quarter: 0010 - inspect in 3rd quarter, every year
On Hold: N
Suspended: N
Facility Team: O

Location Address: OCS LEASE PARCELS P300/P301, HUNTINGTON BEACH 92648 Sector:RE
Mailing Address: 111 W OCEAN BLVD, LONG BEACH 90802-4622 Sector:LK
Instruction:

RECLAIM: Y TITLE V: Y SIP: AIR:

	Application No.	Permit No.	Permit Issue Date	Permit Status	Equipment Category		BCAT/CCAT Description	Application Date	Application Status
	516016	G12351	03/09/2011	ACTIVE	231809	BCAT	Crude Oil/Gas/Water Separation >=400 BPD	12/01/2010	PERMIT TO OPERATE GRANTED
	516017	G12352	03/09/2011	ACTIVE	294962	BCAT	Waste H2O Treating >50,000 GPD	12/01/2010	PERMIT TO OPERATE GRANTED
	516018	G12353	03/09/2011	ACTIVE	58	CCAT	VAPOR RECOVERY SERVING CRUDE OIL PRODUCT	12/01/2010	PERMIT TO OPERATE GRANTED
	516019	G12354	03/09/2011	ACTIVE	289800	BCAT	GAS DESULFURIZER SEPARATION UNIT	12/01/2010	PERMIT TO OPERATE GRANTED
4o	516020	G12355	03/09/2011	ACTIVE	043902	BCAT	I C E (>500 HP) EM ELEC GEN DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516021	G12356	03/09/2011	ACTIVE	043902	BCAT	I C E (>500 HP) EM ELEC GEN DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516022	G12357	03/09/2011	ACTIVE	043902	BCAT	I C E (>500 HP) EM ELEC GEN DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516023	G12358	03/09/2011	ACTIVE	043902	BCAT	I C E (>500 HP) EM ELEC GEN DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516024	G12359	03/09/2011	ACTIVE	043901	BCAT	I C E (50-500 HP) EM ELEC GEN-DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516025	G12360	03/09/2011	ACTIVE	040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516026				040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	11/02/2010	APPLICATION CHANGED FROM CLASS I -
P/C	516027				040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	11/02/2010	APPLICATION CHANGED FROM CLASS I -
issued	516028				040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	11/02/2010	APPLICATION CHANGED FROM CLASS I -
	516029				040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	11/02/2010	APPLICATION CHANGED FROM CLASS I -
No	516030				040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	11/02/2010	PERMIT TO CONSTRUCT GRANTED
	516031	G12361	03/09/2011	ACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516032	G12362	03/09/2011	ACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516033	G12363	03/09/2011	ACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516034	G12364	03/09/2011	ACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516035	G12365	03/09/2011	ACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516036	G12366	03/09/2011	ACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516037	G12367	03/09/2011	ACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516038	G12368	03/09/2011	ACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516039	G12369	03/09/2011	ACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516040	G12370	03/09/2011	ACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516041	G12371	03/09/2011	ACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516042	G12372	03/09/2011	ACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED

° changing VOC limits P/C to P/C under 516050

Inspector: _____ Date: _____ Reviewed By: _____ Date: _____

South Coast Air Quality Management District

Run Date : 09/06/2011 08:07 AM

Facility Equipment List Report

Facility: 166073 BETA OFF SHORE
MR:
Contact: MARINA ROBERTSON (562) 6281526
Last Inspection:
TS: TS-01 Cycle I RECLAIM/Title V F
Quarter: 0010 - inspect in 3rd quarter, every year
SIC: 1311
Facility Status: Active
On Hold: N
Suspended: N
Inspector:
Assignment No.
Facility Team: O
Inspection Date:
Disposition:
Location Address: OCS LEASE PARCELS P300/P301, HUNTINGTON BEACH 92648 Sector:RE
Mailing Address: 111 W OCEAN BLVD, LONG BEACH 90802-4622 Sector:LK
Instruction:

RECLAIM: Y TITLE V: Y SIP: AIR:

	Application No.	Permit No.	Permit Issue Date	Permit Status	Equipment Category		BCAT/CCAT Description	Application Date	Application Status
	516043	G12373	03/09/2011	ACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516044	G12374	03/09/2011	ACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
e/o	516045	G12375	03/09/2011	ACTIVE	08	CCAT	FLARE, OTHER	11/02/2010	PERMIT TO OPERATE GRANTED
	516046	G12376	03/09/2011	ACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516047	G12377	03/09/2011	ACTIVE	08	CCAT	FLARE, OTHER	11/02/2010	PERMIT TO OPERATE GRANTED
	516048	G12378	03/09/2011	ACTIVE	352900	BCAT	STORAGE TANK DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516049	G12379	03/09/2011	ACTIVE	352900	BCAT	STORAGE TANK DIESEL	11/02/2010	PERMIT TO OPERATE GRANTED
	516050				555011	BCAT	TITLE V-C/O	11/02/2010	BANKING/ PLAN GRANTED
	517506				001900	BCAT	FURNACE OTHER MET OPS ALUMINUM	01/11/2011	APPLICATION REJECTED
	517837				555009	BCAT	FACILITY PERMIT AMEND-RECLAIM/TITLE V	01/18/2011	ASSIGNED TO ENGINEER - CLASS III
	517838				040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	01/18/2011	APPLICATION CHANGED FROM CLASS I -
	517839				040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	01/18/2011	APPLICATION CHANGED FROM CLASS I -
	517840				040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	01/18/2011	APPLICATION CHANGED FROM CLASS I -
	517841				040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	01/18/2011	APPLICATION CHANGED FROM CLASS I -
	517842				040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	01/18/2011	APPLICATION CHANGED FROM CLASS I -
	519178				666049	BCAT	PLAN RULE 1110.2- Inspection & Monitoring Plan	02/24/2011	ASSIGNED TO ENGINEER - CLASS III

adding oxidation catalysts w/ 517837

Report:

Inspector: _____ Date: _____ Reviewed By: _____ Date: _____

South Coast Air Quality Management District

Facility Equipment List Report

Facility: 151178 PACIFIC ENERGY RESOURCES, LTD.
Last Inspection: 11/17/2008
SIC: 1311
Inspector: KP04 KIMBERLY L BOLANDER
Inspection Date: 11/17/2008
Location Address: OCS LEASE PARCELS, HUNTINGTON BEACH 92648 Sector:RE
Mailing Address: 111 W OCEAN BLVD, LONG BEACH 90802-4622 Sector:LK
Instruction:

MR:
TS: TS-01 Cycle I RECLAIM/Title V F
Facility Status: Sold
Assignment No. 1152704
Disposition: Operating in Compliance at time of inspection

Contact: MARINA ROBERTSON (562) 6233497
Quarter: 0010 - inspect in 3rd quarter, every year
On Hold: N
Suspended: N
Facility Team: N

RECLAIM: Y TITLE V: Y SIP: AIR:

	Application No.	Permit No.	Permit Issue Date	Permit Status	Equipment Category		BCAT/CCAT Description	Application Date	Application Status
_____	466164	F91727	08/17/2007	INACTIVE	231809	BCAT	Crude Oil/Gas/Water Separation >=400 BPD	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466166	F91728	08/17/2007	INACTIVE	294962	BCAT	Waste H2O Treating >50,000 GPD	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466167	F91729	08/17/2007	INACTIVE	08	CCAT	FLARE, OTHER	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466168	F91730	08/17/2007	INACTIVE	352900	BCAT	STORAGE TANK DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466169	F91731	08/17/2007	INACTIVE	352900	BCAT	STORAGE TANK DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466170	F91732	08/17/2007	INACTIVE	58	CCAT	VAPOR RECOVERY SERVING CRUDE OIL PRODUCT	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466172	F91733	08/17/2007	INACTIVE	289800	BCAT	GAS DESULFURIZER SEPARATION UNIT	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466173	F91734	08/17/2007	INACTIVE	043902	BCAT	I C E (>500 HP) EM ELEC GEN DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466174	F91735	08/17/2007	INACTIVE	043902	BCAT	I C E (>500 HP) EM ELEC GEN DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466175	F91736	08/17/2007	INACTIVE	043902	BCAT	I C E (>500 HP) EM ELEC GEN DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466176	F91740	08/17/2007	INACTIVE	043902	BCAT	I C E (>500 HP) EM ELEC GEN DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466177	F91741	08/17/2007	INACTIVE	043901	BCAT	I C E (50-500 HP) EM ELEC GEN-DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466178	F91767	08/17/2007	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466179	F91742	08/17/2007	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466180	F91743	08/17/2007	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466183	F91744	08/17/2007	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466184	F91746	08/17/2007	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466193	F91747	08/17/2007	INACTIVE	08	CCAT	FLARE, OTHER	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466194	F91748	08/17/2007	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466198	F91749	08/17/2007	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466200	F91751	08/17/2007	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466201	F91752	08/17/2007	INACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466202	F91753	08/17/2007	INACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466203	F91754	08/17/2007	INACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466204	F91755	08/17/2007	INACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466205	F91756	08/17/2007	INACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
_____	466206	F91757	08/17/2007	INACTIVE	040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED

Inspector: _____ Date: _____ Reviewed By: _____ Date: _____

South Coast Air Quality Management District

Facility Equipment List Report

Facility: 151178 PACIFIC ENERGY RESOURCES, LTD.
Last Inspection: 11/17/2008
SIC: 1311
Inspector: KP04 KIMBERLY L BOLANDER
Inspection Date: 11/17/2008
Location Address: OCS LEASE PARCELS, HUNTINGTON BEACH 92648 Sector:RE
Mailing Address: 111 W OCEAN BLVD, LONG BEACH 90802-4622 Sector:LK
Instruction:

MR:
TS: TS-01 Cycle I RECLAIM/Title V F
Facility Status: Sold
Assignment No. 1152704
Disposition: Operating in Compliance at time of inspection

Contact: MARINA ROBERTSON (562) 6233497
Quarter: 0010 - inspect in 3rd quarter, every year
On Hold: N
Suspended: N
Facility Team: N

RECLAIM: Y TITLE V: Y SIP: AIR:

Application No.	Permit No.	Permit Issue Date	Permit Status	Equipment Category		BCAT/CCAT Description	Application Date	Application Status
466207	F91758	08/17/2007	ACTIVE	040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
466209	F91759	08/17/2007	ACTIVE	040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
466210	F91760	08/17/2007	ACTIVE	040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
466211	F91761	08/17/2007	ACTIVE	040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
466213	F91762	08/17/2007	INACTIVE	040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
466214	F91763	08/17/2007	INACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
466215	F91764	08/17/2007	INACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
466216	F91765	08/17/2007	INACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	03/06/2007	PERMIT TO OPERATE GRANTED
466784				555005	BCAT	TIERED (76-250 DEVICES) INITIAL TITLE V PERMIT AI	03/21/2007	BANKING/ PLAN GRANTED
466786				555013	BCAT	RECLAIM AMEND-NO ENGR EVAL	03/28/2007	BANKING/ PLAN GRANTED
467992	F97287	06/05/2008	INACTIVE	08	CCAT	FLARE, OTHER	04/19/2007	PERMIT TO OPERATE GRANTED
467993	F97288	06/05/2008	INACTIVE	08	CCAT	FLARE, OTHER	04/19/2007	PERMIT TO OPERATE GRANTED
467994	F97289	06/05/2008	INACTIVE	289800	BCAT	GAS DESULFURIZER SEPARATION UNIT	04/19/2007	PERMIT TO OPERATE GRANTED
467995	F97290	06/05/2008	INACTIVE	231809	BCAT	Crude Oil/Gas/Water Separation >=400 BPD	04/19/2007	PERMIT TO OPERATE GRANTED
467996	F97291	06/05/2008	INACTIVE	58	CCAT	VAPOR RECOVERY SERVING CRUDE OIL PRODUCT	04/19/2007	PERMIT TO OPERATE GRANTED
467997	F97292	06/05/2008	INACTIVE	294962	BCAT	Waste H2O Treating >50,000 GPD	04/19/2007	PERMIT TO OPERATE GRANTED
467998				555013	BCAT	RECLAIM AMEND-NO ENGR EVAL	04/19/2007	BANKING/ PLAN GRANTED
471815				555010	BCAT	FACILITY PERMIT AMEND- RECLAIM ONLY	07/20/2007	APPLICATION CANCELLED, KEEP FILING I
471819				1C	CCAT	Activated Carbon Adsorber Drum Vent t.s.	07/20/2007	APPLICATION CANCELLED, KEEP ALL FEE
484334	G3664	07/01/2009	INACTIVE	58	CCAT	VAPOR RECOVERY SERVING CRUDE OIL PRODUCT	06/20/2008	PERMIT TO OPERATE GRANTED
484351				555010	BCAT	FACILITY PERMIT AMEND- RECLAIM ONLY	06/20/2008	BANKING/ PLAN GRANTED
485715				666049	BCAT	PLAN RULE 1110.2- Inspection & Monitoring Plan	07/29/2008	APPLICATION CANCELLED, KEEP ALL FEE
485757				555009	BCAT	FACILITY PERMIT AMEND-RECLAIM/TITLE V	07/29/2008	BANKING/ PLAN GRANTED
485759	G10379	10/15/2010	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	07/29/2008	PERMIT TO OPERATE GRANTED
485761	G10380	10/15/2010	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	07/29/2008	PERMIT TO OPERATE GRANTED
485762	G10449	10/21/2010	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	07/29/2008	PERMIT TO OPERATE GRANTED
485764	G10381	10/15/2010	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	07/29/2008	PERMIT TO OPERATE GRANTED

Inspector: _____ Date: _____ Reviewed By: _____ Date: _____

South Coast Air Quality Management District

Facility Equipment List Report

Facility: 151178 PACIFIC ENERGY RESOURCES, LTD.
Last Inspection: 11/17/2008
SIC: 1311
Inspector: KP04 KIMBERLY L BOLANDER
Inspection Date: 11/17/2008
Location Address: OCS LEASE PARCELS, HUNTINGTON BEACH 92648 Sector:RE
Mailing Address: 111 W OCEAN BLVD, LONG BEACH 90802-4622 Sector:LK
Instruction:

MR:
TS: TS-01 Cycle I RECLAIM/Title V F
Facility Status: Sold
Assignment No. 1152704
Disposition: Operating in Compliance at time of inspection

Contact: MARINA ROBERTSON (562) 6233497
Quarter: 0010 - inspect in 3rd quarter, every year
On Hold: N
Suspended: N
Facility Team: N

RECLAIM: Y TITLE V: Y SIP: AIR:

	Application No.	Permit No.	Permit Issue Date	Permit Status	Equipment Category		BCAT/CCAT Description	Application Date	Application Status
	485765	G10382	10/15/2010	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	07/29/2008	PERMIT TO OPERATE GRANTED
	485766	G10383	10/15/2010	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	07/29/2008	PERMIT TO OPERATE GRANTED
	485767	G10425	10/20/2010	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	07/29/2008	PERMIT TO OPERATE GRANTED
	497442	G3668	07/01/2009	INACTIVE	294962	BCAT	Waste H2O Treating >50,000 GPD	03/27/2009	PERMIT TO OPERATE GRANTED
	497444	G3667	07/01/2009	INACTIVE	231809	BCAT	Crude Oil/Gas/Water Separation >=400 BPD	03/27/2009	PERMIT TO OPERATE GRANTED
	497445	G3666	07/01/2009	INACTIVE	08	CCAT	FLARE, OTHER	03/27/2009	PERMIT TO OPERATE GRANTED
	498831	G3665	07/01/2009	INACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	05/19/2009	PERMIT TO OPERATE GRANTED
	498832	G3673	07/02/2009	INACTIVE	053208	BCAT	TURBINE ENGINE (<=50 MW) N G/P G-DIESEL	05/19/2009	PERMIT TO OPERATE GRANTED
	498833				555010	BCAT	FACILITY PERMIT AMEND- RECLAIM ONLY	05/19/2009	BANKING/ PLAN GRANTED
	500153	G10368	10/14/2010	INACTIVE	040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	07/01/2009	PERMIT TO OPERATE GRANTED
	500154				040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	07/01/2009	APPLICATION CANCELLED, KEEP ALL FEE
	500155				040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	07/01/2009	APPLICATION CANCELLED, KEEP ALL FEE
	500156				040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	07/01/2009	APPLICATION CANCELLED, KEEP ALL FEE
	500157				040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	07/01/2009	APPLICATION CANCELLED, KEEP ALL FEE
	500158	G10582	11/02/2010	ACTIVE	040902	BCAT	I C E (>500 HP) N-EM STAT DIESEL	07/01/2009	PERMIT TO OPERATE GRANTED
	500159				555009	BCAT	FACILITY PERMIT AMEND-RECLAIM/TITLE V	07/01/2009	APPLICATION CANCELLED, KEEP FILING I
	503607				80	CCAT	NON-CATALYTIC REDUCTION	11/17/2009	APPLICATION REJECTED
	503608	G10378	10/15/2010	INACTIVE	040901	BCAT	I C E (50-500 HP) N-EM STAT DIESEL	11/17/2009	PERMIT TO OPERATE GRANTED
	503609				555010	BCAT	FACILITY PERMIT AMEND- RECLAIM ONLY	11/17/2009	BANKING/ PLAN GRANTED
	504368				555010	BCAT	FACILITY PERMIT AMEND- RECLAIM ONLY	12/09/2009	BANKING/ PLAN GRANTED
	505783				666049	BCAT	PLAN RULE 1110.2- Inspection & Monitoring Plan	01/27/2010	APPLICATION CANCELLED, KEEP ALL FEE

Inspector: _____ Date: _____ Reviewed By: _____ Date: _____

South Coast Air Quality Management District

Facility Equipment List Report

Facility: 151178 PACIFIC ENERGY RESOURCES, LTD.
Last Inspection: 11/17/2008
SIC: 1311
Inspector: KP04 KIMBERLY L BOLANDER
Inspection Date: 11/17/2008
Location Address: OCS LEASE PARCELS, HUNTINGTON BEACH 92648 Sector:RE
Mailing Address: 111 W OCEAN BLVD, LONG BEACH 90802-4622 Sector:LK
Instruction:

MR:
TS: TS-01 Cycle I RECLAIM/Title V F
Facility Status: Sold
Assignment No. 1152704
Disposition: Operating in Compliance at time of inspection

Contact: MARINA ROBERTSON (562) 6233497
Quarter: 0010 - inspect in 3rd quarter, every year
On Hold: N
Suspended: N
Facility Team: N

RECLAIM: Y TITLE V: Y SIP: AIR:

Application No.	Permit No.	Permit Issue Date	Permit Status	Equipment Category	BCAT/CCAT Description	Application Date	Application Status

Report: INSPECTION FINDINGS 2008 RECLAIM Audit:

Background
Aera Energy LLC, ID# 104012 operated this Cycle 1 NOx RECLAIM facility until 3/5/07 when it was purchased by Pacific Energy Resources, Ltd (PERL), ID# 151178. This report summarizes an audit of emissions reported by PERL for CY 2008. Only large source, process unit and Rule 219 exempt equipment operate at the OCS crude oil and gas production facility.

On 11/17/08 0620 I arrived at Island Terminal Transport and met with Marina Robertson, HSE Manager for Pacific Energy Resources, Ltd (PERL). We flew to the PERL Outer Continental Shelf (OCS) Platforms to perform the Cycle 1 RECLAIM audit inspection. We landed at Platform Ellen at 0725. ACR Technician Allan Knowles accompanied me and Ms. Robertson when I performed the inspection of Platforms Ellen and Elly. On Eureka I was accompanied by Lead Operator Todd Stallings and Ms. Robertson. I also conferred with Consultant Milan Steube via telephone during the inspection.

The OCS crude oil and gas production facility is offshore about 9 miles west of Huntington Beach in federal waters within the Beta Field. The facility consists of 3 fixed platform structures: Ellen, Elly, and Eureka. Ellen and Elly are linked by a bridge. Eureka is located about 1 mile southeast of them.

The oil and gas wells and some minor processing equipment are located on Ellen and Eureka. The oil, gas and water produced from the wells on Ellen and Eureka are transported via pipelines to Elly for additional processing. The resulting oil product is shipped to shore via pipeline, the gas product is used on Elly as fuel in turbines that generate electricity and drive pumps. Water is re-injected in the oil reservoir via wells used exclusively for that purpose.

A Title V Permit has not been issued to the facility. I consulted with District Engineer Vicky Lee regarding the permit and relevant requirements for this facility.

2008 Compliance Action/MDP
As a result of PLC-related problems during CY 2007, Inspector Martha Thomas issued NOV P52600 to PERL on 4/9/08 for failure to maintain fuel monitoring meters on large RECLAIM sources. This violation was corrected.

I verified that process gas meters and diesel meters are in place and operational. A PLC records meter data and transmits the information to a DAS computer file. As back-up, the facility also installed manual-read fuel meters. They are electronic and have a non-resettable digital display.

The facility used appropriate MDP to calculate and report NOx emissions from D86 in 2008. 2012A Chapter 3 I (a) and (b) procedures were correctly applied to substitute data in March, October and November. The problem with the meter was corrected mid-November 2008.

RECLAIM NOx Sources
(See attached table of devices, emission factors and concentration limits)

Emission sources on the platforms burn either diesel, which is loaded from a boat, or process gas (mostly methane), which is produced when pumping crude oil.

A total of 18 ICEs are located on the 3 platforms. All 18 are fueled exclusively with diesel. Of the 18 ICEs, 5 are used to power emergency generators and are limited by permit condition to 200 hours of operation per year. These 5 ICEs are all Process Units. Of the remaining 13 ICEs, 6 are well servicing rig engines and 7 are crane engines. The rig engines are all Large Sources and the crane engines are all Process Units. Device D94, a Process Unit utility pump driver on Eureka, was removed in 2007 to be replaced by an electric motor.

South Coast Air Quality Management District

Facility Equipment List Report

Facility: 151178 PACIFIC ENERGY RESOURCES, LTD.
Last Inspection: 11/17/2008
SIC: 1311
Inspector: KP04 KIMBERLY L BOLANDER
Inspection Date: 11/17/2008
Location Address: OCS LEASE PARCELS, HUNTINGTON BEACH 92648 Sector:RE
Mailing Address: 111 W OCEAN BLVD, LONG BEACH 90802-4622 Sector:LK
Instruction:

MR:
TS: TS-01 Cycle I RECLAIM/Title V F
Facility Status: Sold
Assignment No. 1152704
Disposition: Operating in Compliance at time of inspection

Contact: MARINA ROBERTSON (562) 6233497
Quarter: 0010 - inspect in 3rd quarter, every year
On Hold: N
Suspended: N
Facility Team: N

RECLAIM: Y TITLE V: Y SIP: AIR:

Application No.	Permit No.	Permit Issue Date	Permit Status	Equipment Category	BCAT/CCAT Description	Application Date	Application Status

I reviewed the spreadsheets that the facility used to calculate and report NOx emissions. Fuel meter records, higher heating values and F-Factor values used were also available and I applied these to verify that the facility correctly calculated and reported NOx emissions.

Major Sources
The two major source Mars Turbines (D101, 103) have not operated since the 4th quarter 1999. I verified that the diesel and process gas lines were blind flanged. These units are classified as non-operational.on the Facility Permit. There are no other major source devices operated by the facility.

Large Sources
The Large Source ICEs each have a concentration limit of 450 ppmv. The remaining 6 operational Large Source turbines have various concentration limits for both process gas and diesel consumption.

All of the turbines are located on Elly. Elly has no wells, this platform is used primarily for energy production and oil/water separation. D95, D96, and D97 are Large Source Saturn turbines that provide power for all 3 platforms. They run on process gas and diesel fuel. D97 has been out of service since prior to 2005. D98, D99, and D100 are Large Source Centaur turbines that also provide electricity for all three platforms. They run on process gas and diesel fuel.

Large Source NOx monthly mass emissions are calculated using equation 17:

Ek = PPMVO2 x [20.9/(20.9 - b)] x 1.195 x 10-7 x (Fdj x dj x Vj)

Calculation example verified:

D85 September 2008 NOx calculation.
1840 gallons diesel used

450 ppmv x [20.9/20.9-15] x 1.195 x 10-7 x 1 x (137000 BTU/gal x X gal x 9190 dscf/106BTU)

450ppmv x 3.542 x .0000001195 x 137000 BTU/gal x 1840 gal x 9190 dscf/106BTU
Ek lbs NOx/ month = 441.25 lbs NOx /month

441.32 lbs NOx was reported electronically. The difference is due to rounding.

Process Units
The facility uses the default emission factor of 469 lbs NOx/1000 gallons for diesel burned in the Process Unit ICEs. Several of the ICEs are standby engines with annual hourly usage restrictions. The facility was in compliance with these limits.

Calculation example verified:
D90 2nd Quarter 2008 NOx calculation
128 gallons diesel used

Inspector: _____ Date: _____ Reviewed By: _____ Date: _____

South Coast Air Quality Management District

Facility Equipment List Report

Facility: 151178 PACIFIC ENERGY RESOURCES, LTD.
MR:
Contact: MARINA ROBERTSON (562) 6233497
Last Inspection: 11/17/2008
TS: TS-01 Cycle I RECLAIM/Title V F
Quarter: 0010 - inspect in 3rd quarter, every year
SIC: 1311
Facility Status: Sold
On Hold: N
Suspended: N
Inspector: KP04 KIMBERLY L BOLANDER
Assignment No. 1152704
Facility Team: N
Inspection Date: 11/17/2008
Disposition: Operating in Compliance at time of inspection
Location Address: OCS LEASE PARCELS, HUNTINGTON BEACH 92648 Sector:RE
Mailing Address: 111 W OCEAN BLVD, LONG BEACH 90802-4622 Sector:LK
Instruction:

RECLAIM: Y TITLE V: Y SIP: AIR:

Application No.	Permit No.	Permit Issue Date	Permit Status	Equipment Category	BCAT/CCAT Description	Application Date	Application Status

469 lbs NOx/1000 gallons x 128 gallons = 60.03 lbs NOx/quarter

60.03 lbs NOx was reported electronically for Quarter 2.

Rule 219 and Various Locations
A variety of Rule 219 exempt equipment is used, all fueled by diesel and mostly operated by contractors. A meter is in place accounting for gallons going to the diesel pump and nozzle where they fuel their equipment. Such equipment includes wire line units, fork lifts, compressors for divers, and compressors for sandblasting and painting projects. Emissions from contractor equipment are not accounted for as per Rule 2012 Appendix A, Chapter 1, page 2 because they are used for "maintenance and repair of structure, equipment, and their appurtenances." The facility assumes 1 gallon of diesel/quarter for the Whittaker escape capsules.

NOx emissions from a portable generator operated on Eureka were reported under Various Locations for Quarters 1&2.

Fuel Characteristics
Monthly sampling results indicate that the process gas was in compliance with Rule 431.1/431.2 and permit conditions limiting total sulfur and hydrogen sulfide concentrations. The gas was also tested for HHV and Fd factors. Diesel fuel total sulfur concentrations were below 15 ppm.

Source Testing/Tune-ups
The large sources and process units were tuned-up in accordance with the schedule specified in Rule 2012, Appendix A, Chapter 5, Table 5-B.

All but one of six large source turbines (D95-D100) were tested for NOx concentration limit compliance and relative accuracy audits (RAA) were performed for stack gas exhaust flow during the 3 year test cycle of 1/1/06-12/31/08. D98 broke down in October 2008 and could not be returned to service in time to meet the 12/31/08 source testing deadline. The facility was granted a variance (Case# 4636-14) from testing requirements through 4/29/09. The equipment was replaced and tested on 2/10/09. Required tune-ups for the 2008 compliance year were performed on each turbine once by water washing the inside.

All six large source rig engines were tested for NOx concentration limits and RAA were performed for stack gas exhaust flow during the 3 year test cycle of 1/1/06-12/31/08 and were in compliance. Rule 1110.2 CO and VOC concentration limit testing is performed once per year for one source from each category of rig engines (D81-D86), crane engines (D87-D93), and utility pump engine (D94) as per an agreement between AQMD and AERA dated 7/12/96. All rig engines (except for D83 which was non-operational) were tested as required and complied with CO and VOC concentration limits. Tune-ups were performed twice on each large source engine for the 2008 compliance year.

Process unit crane engines D88, D89, and D90 and utility pump D94 were tested pursuant to Rule 1110.2 requirements and the agreement, complying with CO and VOC concentration limits. The emergency engines (D76-D80) were not tested because they are exempt according to Rule 1110.2(i)(2). Timer readings verify these are operated under 200 hours per year. All process units were tuned-up once during the 2008 compliance year as required.

RECLAIM Compliance Summary
NOx emissions for compliance year 2008 were reliable and nearly identical to emissions that I calculated. The facility calculated emissions are acceptable for this audit. PERL submitted electronic data, QCERTS and 2008 APEPs in compliance with reporting requirements.

PERL

Inspector: _____ Date: _____ Reviewed By: _____ Date: _____

South Coast Air Quality Management District

Facility Equipment List Report

Facility: 151178 PACIFIC ENERGY RESOURCES, LTD.
Last Inspection: 11/17/2008
SIC: 1311
Inspector: KP04 KIMBERLY L BOLANDER
Inspection Date: 11/17/2008
Location Address: OCS LEASE PARCELS, HUNTINGTON BEACH 92648 Sector:RE
Mailing Address: 111 W OCEAN BLVD, LONG BEACH 90802-4622 Sector:LK
Instruction:

MR:
TS: TS-01 Cycle I RECLAIM/Title V F
Facility Status: Sold
Assignment No. 1152704
Disposition: Operating in Compliance at time of inspection

Contact: MARINA ROBERTSON (562) 6233497
Quarter: 0010 - inspect in 3rd quarter, every year
On Hold: N
Suspended: N
Facility Team: N

RECLAIM: Y TITLE V: Y SIP: AIR:

Application No.	Permit No.	Permit Issue Date	Permit Status	Equipment Category	BCAT/CCAT Description	Application Date	Application Status

2008 NOx APEP dataInspector-Calculated NOx DataTotal Eligible RTC
377,722 lbs377,722 lbs377,831 lbs

NOx emissions from the beginning of the 2008 compliance year through the end of the 3rd quarter exceeded the annual NOx emissions allocation in effect at the end of the reconciliation period for that quarter. As a result Inspector John Lee issued NOV P55503 for a violation of Rule 2004 on 5/27/09.

The facility complies with applicable provisions of Rule 2012. No additional corrective action recommended

Non-RECLAIM Compliance Summary
The facility complies with Non-RECLAIM rules including Rule 1173, 1176 and 1110.2. As I performed my equipment inspection I looked for visible leaks in the processing equipment subject to these rules and did not observe any. AERA uses a contractor, Avanti, to periodically monitor

Inspector: _____ Date: _____ Reviewed By: _____ Date: _____

South Coast
Air Quality Management District
21865 E. Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 · www.aqmd.gov

April 12, 2011

Mr. Gerardo Rios
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Rios:

The South Coast Air Quality Management District (AQMD) has received from Beta Offshore a Title V application, A/N 517837, for a "minor permit revision."

The modification under this minor permit revision includes the proposed alteration of 5 crane engines permits by the addition of the oxidation catalyst to reduce VOC emissions to meet Rule 1110.2 requirements.

The AQMD is required under Rule 3005(e) to provide a copy of the proposed permit to the EPA Administrator for a 45-day review. As such, a copy of the proposed revision to the existing Title V permit is attached along with our engineering analysis for your review. If you have any questions or wish to provide comments regarding this project, please call Mr. Chandrashekhar S. Bhatt (909) 396-2653 or Mr. Rob Castro (909) 396-2552.

Very truly yours,

Gary Quinn for WCT

William C. Thompson, P. E.
Senior Manager
Operation Unit
Engineering and Compliance

Attachments

cc: Ms. Marina Robertson
Beta Offshore
111 West Ocean Blvd., suite 1240
Long Beach, CA 90802

c:\Beta-Offshore-tv-minor-rev-517837-842-epa-covr-ltr

Certified Mail, Return Receipt Request

FACILITY PERMIT TO OPERATE
BETA OFF SHORE

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR:	BETA OFF SHORE
LEGAL OPERATOR (if different than owner):	
EQUIPMENT LOCATION:	OCS LEASE PARCELS P300/P301 HUNTINGTON BEACH, CA 92648
MAILING ADDRESS:	111 W OCEAN BLVD STE 1240 LONG BEACH, CA 90802
RESPONSIBLE OFFICIAL:	STEVE LILES
TITLE:	EXECUTIVE VICE PRESIDENT
TELEPHONE NUMBER:	(562) 628-4526
CONTACT PERSON:	MARINA ROBERTSON
TITLE:	HSE MANAGER
TELEPHONE NUMBER:	(562) 683-3497
INITIAL TITLE V PERMIT ISSUED:	March 12, 2010
TITLE V PERMIT EXPIRATION DATE:	March 11, 2015

TITLE V	RECLAIM	
YES	NOx:	YES
	SOx:	NO
	CYCLE:	1
	ZONE:	COASTAL

South Coast Air Quality Management District

Form 500-A1
Title V Permit Application Supplemental

Mail To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765-0944
Tel: (909) 396-3385
www.aqmd.gov

Section I - Operator Information

1. Facility Name (Business Name of Operator That Appears On Permit):

Beta Offshore - Beta OCS Platforms Facility

2. *Valid AQMD Facility ID* (Available On Permit Or Invoice Issued By AQMD):

166073

3. Facility Is Located In Title V Area:

- (●) 1 All other zip codes not listed below
- ( ) 2 92201 92202 92203 92210 92211 92234 92235 92236 92239* 92240 92241 92247 92248 92253 92254 92255 92258 92260 92261 92262 92263 92264 92270 92274 92275 92276 92282 92292 92561
- ( ) 3 92239*

* If your zip code is 92239, please call (909) 396-3385 to verify your Title V area.

Section II - Title V Application

1. This is an application for a(n) (Check *all applicable boxes and provide the requested information as appropriate*):

a. ☐ Initial Title V Permit
b. ☐ Permit Renewal: (Provide current permit expiration date) _____
c. ☐ Administrative Change (check all that apply)
   - ☐ Change of Operator. (Complete and attach equipment-specific Form 400-E-XX series forms)
   - ☐ Change of Facility Information
   - ☐ *Other, Please specify:* _____
d. ☑ Title V Permit Revision
e. ☐ Title V Exemption Plan
f. ☐ MACT Part 1
g. ☐ Permit Shield

Complete and attach equipment specific Form 400-E-XX series form(s) to this form if your application involves permit action for new construction, change of location, non-administrative permit revision, alternative operating scenario (AOS), permit shield, streamlined permit conditions, or temporary source permit.

2. Is this facility required to prepare a Risk Management Plan (RMP) for another agency? ( ) Yes ( ) No

Section III - Title V Submittal Checklist

1. Enter the quantity of each type form submitted in the space provided:

6 400-A (REQUIRED)	___ 500-C1 (REQUIRED)	___ 500-F1	___ 500-H (REQUIRED)
1 400-CEQA (REQUIRED)	___ 500-C2	___ 500-F2	___ 500-MACT PART 1
1 500-A2 (REQUIRED)	___ 500-D	___ 500-F3	___ OTHER (SPECIFY): ___
___ 500-B (REQUIRED)	___ 500-E	___ 500-F4	

2. Additional information referenced in this application submitted:

Cover Letter; One Form 500-A1; Five Forms 400-E-13b; One Form 400-E-5 (common to all five engines)

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South Coast Air Quality Management District

Form 500-A2
Title V Application Certification

Mail To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765-0944
Tel: (909) 396-3385
www.aqmd.gov

Section I - Operator Information

1. Facility Name (Business Name of Operator That Appears On Permit): Beta Offshore - Beta OCS Platforms Facility

2. Valid AQMD Facility ID (Available On Permit Or Invoice Issued By AQMD): 166073

3. This Certification is submitted with a (Check one):
- a. ⦿ *Title V Application (Initial, Revision or Renewal)*
- b. ○ Supplement/Correction to a Title V Application
- c. ○ MACT Part 1

4. Is Form 500-C2 included with this Certification? ○ Yes ○ No

Section II - Responsible Official Certification Statement

Read each statement carefully and check each that applies – ***You must check 3a or 3b.***

1. For Initial, Permit Renewal, and Administrative Application Certifications:

a. ○ The facility, including equipment that are exempt from written permit per Rule 219, is currently operating and will continue to operate in compliance with all applicable requirement(s) identified in Section II and Section III of Form 500-C1,

i. ☐ except for those requirements that do not specifically pertain to such devices or equipment and that have been identified as "Remove" on Section III of Form 500-C1.

ii. ☐ except for those devices or equipment that have been identified on the completed and attached Form 500-C2 that will not be operating in compliance with the specified applicable requirement(s).

b. ○ The facility, including equipment that are exempt from written permit per Rule 219, will meet in a timely manner, all applicable requirements with future effective dates.

2. For Permit Revision Application Certifications:

a. ☑ The equipment or devices to which this permit revision applies, will in a timely manner comply with all applicable requirements identified in Section II and Section III of Form 500-C1.

3. For MACT Hammer Certifications:

a. ○ The facility is subject to Section 112(j) of the Clean Air Act (Subpart B of 40 CFR part 63), also known as the MACT "hammer." The following information is submitted with a Title V application to comply with the Part 1 requirements of Section 112(j).

b. ⦿ The facility is not subject to Section 112(j) of the Clean Air Act (Subpart B of 40 CFR part 63).

Section III - Authorization/Signature

I certify under penalty of law that I am the responsible official for this facility as defined in AQMD Regulation XXX and that based on information and belief formed after reasonable inquiry, the statement and information in this document and in all attached application forms and other materials are true, accurate, and complete.

1. Signature of Responsible Official:	2. Title of Responsible Official: Vice President and Chief Operating Officer
3. Print Name: Steve Liles	4. Date: 12-28-10
5. Phone #: (562) 628-1526	6. Fax #: (562) 628-1536

7. Address of Responsible Official:

Street #	City	State	Zip
111 West Ocean Blvd., Ste. 1240	Long Beach	CA	90802

Acid Rain Facilities Only: Please Complete Section IV

OMITTED

© South Coast Air Quality Management District, Form 500-A2 (2009.04)

CHECK NO. 003267

1012-AP-66	12/23/10	REQ122310	12719.72	0.00	12719.72
Application for Permits: Install Catalysts					

1170 SOUTH COAST AIR QUALITY 12/30/10 12,719.72

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