



June 30, 2023

William Sarraf
Santa Barbara County APCD
260 N. San Antonio Rd. Suite A
Santa Barbara, CA 93110

Re: Ellwood Stationary Source (Platform Holly) Part 70 Renewal Forms (SSID 1063)

Dear Will,

Enclosed are the required forms for the California State Lands Commission (CSLC)/Beacon West Energy Group Ellwood Stationary Source facilities to initiate the reevaluation process for the Platform Holly Part 70 air permit.

The following forms are enclosed:

1. Form APCD-01.
2. Part 70 forms 1302-A1, A2, B, I1, I2 and M.
3. Platform Holly De Minimus Tracking Logs.
4. Marked up PTO 8234-R11 reflecting in service and out of service equipment on Platform Holly as of June 30, 2023 (submitted via e-mail only).

Please debit Beacon West any applicable fees, and feel free to contact me at (805) 395-9676 or john.garnett@beacon-west.com if you have any questions regarding this submittal.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Garnett", is written over a circular blue stamp or seal.

John Garnett
EHSR Advisor
Enclosures Noted



General Permit Application Form -01

Santa Barbara County Air Pollution Control District
 260 N. San Antonio Road, Suite A
 Santa Barbara, CA 93110-1315

1. APPLICATION TYPE (check all that apply):

- Authority to Construct (ATC)
- Permit to Operate (PTO)
- ATC Modification
- PTO Modification
- Other (Specify)
- Transfer of Owner/Operator (use Form -01T)
- Emission Reduction Credits
- Increase in Production Rate or Throughput
- Decrease in Production Rate or Throughput

Previous ATC/PTO Number (if known)

Yes No Are Title 5 Minor Modification Forms Attached? (this applies to Title 5 sources only and applies to all application types except ATCs and Emission Reduction Credits). Complete Title 5 Form -1302 A1/A2, B, and M. Complete Title 5 Form -1302 C1/C2, D1/D2, E1/E2, F1/F2, G1/G2 as appropriate. <http://www.ourair.org/wp-content/uploads/t5-forms.pdf>

Mail the completed application to the APCD's Engineering Division at the address listed above.

2. FILING FEE:

A \$420 application filing fee must be included with each application. The application filing fee is COLA-adjusted every July 1st. Please ensure you are remitting the correct current fee (the current fee schedule is available on the APCD's webpage at: <http://www.ourair.org/district-fees>). This filing fee will not be refunded or applied to any subsequent application. Payment may also be made by credit card by using the Credit Card Authorization Form at the end of this application.

3. IS YOUR PROJECT'S PROPERTY BOUNDARY LOCATED OR PROPOSED TO BE LOCATED WITHIN 1,000 FEET FROM THE OUTER BOUNDARY OF A SCHOOL? If yes, and the project results in an emissions increase, submit a completed Form -03 (*School Summary Form*) <http://www.ourair.org/wp-content/uploads/apcd-03.pdf> Yes No

If yes, provide the name of school(s)

Address of school(s)

City Zip Code

4. DOES YOUR APPLICATION CONTAIN CONFIDENTIAL INFORMATION? Yes No

If yes, please submit with a redacted duplicate application which shall be a public document. In order to be protected from disclosure to the public, all information claimed as confidential shall be submitted in accordance with APCD Policy & Procedure 6100-020 (*Handling of Confidential Information*): <http://www.ourair.org/wp-content/uploads/6100-020.pdf>, and meet the criteria of CA Govt Code Sec 6254.7. Failure to follow required procedures for submitting confidential information, or to declare it as confidential at the time of application, shall be deemed a waiver by the applicant of the right to protect such information from public disclosure. *Note: Part 70 permit applications may contain confidential information in accordance with the above procedures, however, the content of the permit documents must be public (no redactions).*

FOR APCD USE ONLY			DATE STAMP
FID	3105	Permit No.	Rec'd 6/28/2023
Project Name	Platform Holly		
Filing Fee	\$456	202.E? YES / NO	

Billed Beacon West #500000/205715

5. COMPANY/CONTACT INFORMATION:

Owner Info		<input type="radio"/> Yes <input checked="" type="radio"/> No	Use as Billing Contact?
Company Name	California State Lands Commission		
Doing Business As			
Contact Name	Jennifer Lucchesi	Position/Title	Executive Officer
Mailing Address	100 Howe Ave. Suite 100		
City	Sacramento	State	CA Zip Code 95825
Telephone	(916) 574-1800	Cell	Email

Operator Info		<input checked="" type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name	California State Lands Commission/Beacon West Energy Group, LLC		
Doing Business As			
Contact Name	John Garnett	Position/Title	EHSR Advisor
Mailing Address	1145 Eugenia Place #101		
City	Carpinteria	State	CA Zip Code 93013
Telephone	(805) 395-9676	Cell	Email john.garnett@beacon-west.com

Authorized Agent Info*		<input type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name			
Doing Business As			
Contact Name		Position/Title	
Mailing Address			
City		State	Zip Code
Telephone		Cell	Email

*Use this section if the application is not submitted by the owner/operator. Complete APCD Form -01A (<http://www.ourair.org/wp-content/uploads/apcd-01a.pdf>). Owner/Operator information above is still required.

SEND PERMITTING CORRESPONDENCE TO (check all that apply):	
<input type="checkbox"/> Owner	<input checked="" type="checkbox"/> Operator
<input type="checkbox"/> Authorized Agent	<input type="checkbox"/> Other (attach mailing information)

6. GENERAL NATURE OF BUSINESS OR AGENCY:

oil & gas

7. EQUIPMENT LOCATION (Address):

Specify the street address of the proposed or actual equipment location. If the location does not have a designated address, please specify the location by cross streets, or lease name, UTM coordinates, or township, range, and section.

Equipment Address	Platform Holly Parcel 3242-1 South Ellwood Offshore Field; Santa Barbara County		
City	offshore of Goleta	State	CA Zip Code
Work Site Phone	8059612360		

- Incorporated (within city limits)
 Unincorporated (outside city limits)
 Used at Various Locations

Assessors Parcel No(s):

8. PROJECT DESCRIPTION:

(Describe the equipment to be constructed, modified and/or operated or the desired change in the existing permit. Attach a separate page if needed):

Stationary Source permit re-evaluation for Platform Holly

9. DO YOU REQUIRE A LAND USE PERMIT OR OTHER LEAD AGENCY PERMIT FOR THE PROJECT DESCRIBED IN THIS APPLICATION?: Yes No

A. If yes, please provide the following information

Agency Name	Permit #	Phone #	Permit Date

* The lead agency is the public agency that has the principal discretionary authority to approve a project. The lead agency is responsible for determining whether the project will have a significant effect on the environment and determines what environmental review and environmental document will be necessary. The lead agency will normally be a city or county planning agency or similar, rather than the Air Pollution Control District.

B. If yes, has the lead agency permit application been deemed complete and is a copy of their completeness letter attached?

- Yes No

Please note that the APCD will not deem your application complete until the lead agency application is deemed complete.

C. If the lead agency permit application has not been deemed complete, please explain.

D. A copy of the final lead agency permit or other discretionary approval by the lead agency may be requested by the APCD as part of our completeness review process.

10. PROJECT STATUS:

A. Date of Equipment Installation

B. Have you been issued a Notice of Violation (NOV) for not obtaining a permit for this equipment/modification *and/or* have you installed this equipment without the required APCD permit(s)? If yes, the application filing is double per Rule 210. Yes No

C. Is this application being submitted due to the loss of a Rule 202 exemption? Yes No

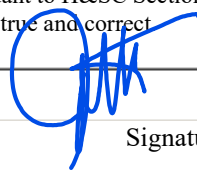
D. Will this project be constructed in multiple phases? If yes, attach a separate description of the nature and extent of each project phase, including the associated timing, equipment and emissions. Yes No

E. Is this application also for a change of owner/operator? If yes, please also include a completed APCD Form -01T. Yes No

11. APPLICANT/PREPARER STATEMENT:

The person who prepares the application also must sign the permit application. The preparer may be an employee of the owner/operator or an authorized agent (contractor/consultant) working on behalf of the owner/operator (an *Authorized Agent Form -01A* is required).

I certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct

	June 13, 2023
Signature of application preparer	Date
John Garnett	Beacon West Energy Group, LLC
Print name of application preparer	Employer name

12. APPLICATION CHECKLIST (*check all that apply*)

- Application Filing Fee (Fee = \$420. The application filing fee is COLA adjusted every July 1st. Please ensure you are remitting the current fee.) As a convenience to applicants, the APCD will accept credit card payments. If you wish to use this payment option, please complete the attached *Credit Card Authorization Form* and submit it with your application.
- Existing permitted sources may request that the filing fee be deducted from their current reimbursable deposits by checking this box. Please deduct the filing fee from my existing reimbursement account.
- Form -01T (*Transfer of Owner/Operator*) attached if this application also addresses a change in owner and/or operator status from what is listed on the current permit. <http://www.ourair.org/wp-content/uploads/apcd-01t.pdf>
- Form -03 (*School Summary Form*) attached if the project's property boundary is within 1,000 feet of the outer boundary of a school (k-12) and the project results in an emissions increase. <http://www.ourair.org/wp-content/uploads/apcd-03.pdf>
- Information required by the APCD for processing the application as identified in APCD Rule 204 (*Applications*), the APCD's *General APCD Information Requirements List* (<http://www.sbcapcd.org/eng/dl/other/gen-info.pdf>), and any of the APCD's Process/Equipment Summary Forms (<http://www.ourair.org/permit-applications>) that apply to the project.
- Form -01A (*Authorized Agent Form*) attached if this application was prepared by and/or if correspondence is requested to be sent to an Authorized Agent (e.g., contractor or consultant). This form must accompany each application. <http://www.ourair.org/wp-content/uploads/apcd-01a.pdf>
- Confidential Information submitted according to APCD Policy & Procedure 6100-020. (*Failure to follow Policy and Procedure 6100-020 is a waiver of right to claim information as confidential.*)

13. NOTICE OF CERTIFICATION:

All applicants must complete the following Notice of Certification. This certification must be signed by the Authorized Company Representative representing the owner/operator. Signatures by Authorized Agents will not be accepted.

NOTICE of CERTIFICATION

I, , am employed by or represent
Type or Print Name of Authorized Company Representative

Type or Print Name of Business, Corporation, Company, Individual, or Agency

(hereinafter referred to as the applicant), and certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct and the equipment listed herein complies or can be expected to comply with said rules and regulations when operated in the manner and under the circumstances proposed. If the project fees are required to be funded by the cost reimbursement basis, as the responsible person, I agree that I will pay the Santa Barbara County Air Pollution Control District the actual recorded cost, plus administrative cost, incurred by the APCD in the processing of the application within 30 days of the billing date. If I withdraw my application, I further understand that I shall inform the APCD in writing and I will be charged for all costs incurred through closure of the APCD files on the project.

For applications submitted for Authority to Construct, modifications to existing Authority to Construct, and Authority to Construct/Permit to Operate permits, I hereby certify that all major stationary sources in the state and all stationary sources in the air basin which are owned or operated by the applicant, or by an entity controlling, controlled by, or under common control with the applicant, are in compliance, or are on approved schedule for compliance with all applicable emission limitations and standards under the Clean Air Act (42 USC 7401 *et seq.*) and all applicable emission limitations and standards which are part of the State Implementation Plan approved by the Environmental Protection Agency.

Completed By: Title:

Date: Phone:

Signature of Authorized Company Representative

**PLEASE NOTE THAT FAILURE TO COMPLETELY PROVIDE ALL REQUIRED INFORMATION OR FEES WILL
RESULT IN YOUR APPLICATION BEING RETURNED OR DEEMED INCOMPLETE.**

7 Flare Systems

7.1 High-pressure Flare

Device ID #	007982	Device Name	High-pressure Flare
<i>Rated Heat Input</i>		<i>Physical Size</i>	1312.50 MMBtu/Hour
<i>Manufacturer</i>	Indair Self-Assisted	<i>Operator ID</i>	H-100
<i>Model</i>	1-24-H-VS-WB	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	The pressurized flare has a 10-inch diameter inlet; mounted to the existing vent stack boom; design rated to flare gas flow rates of up to 30 MMSCFD		

7.2 Low-Pressure Flare OOS

Device ID #	009603	Device Name	Low-Pressure Flare
<i>Rated Heat Input</i>		<i>Physical Size</i>	126.00 MMBtu/Hour
<i>Manufacturer</i>		<i>Operator ID</i>	H101
<i>Model</i>	CAK-4	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	This low pressure flare is a combined pilot/flare tip; mounted to an existing flare stack boom with a permit limited to flare gas flow rates of up to 2000 SCFM		

8 Supply Boat

8.1 Supply Boat - Generator Engines

Device ID #	009790	Device Name	Supply Boat - Generator Engines
<i>Rated Heat Input</i>		<i>Physical Size</i>	530.00 Brake Horsepower
<i>Manufacturer</i>		<i>Operator ID</i>	3105-BB
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>			

12 Crane Engine

<i>Device ID #</i>	111506	<i>Device Name</i>	Crane Engine
<i>Rated Heat Input</i>	1.920 MMBtu/Hour	<i>Physical Size</i>	250.00 Horsepower
<i>Manufacturer</i>	Caterpillar	<i>Operator ID</i>	Crane Engine
<i>Model</i>	C7-ACERT, IND-C	<i>Serial Number</i>	JTF00836
<i>Location Note</i>			
<i>Device Description</i>	Tier 3 Diesel IC engine		

13 Pressure Vessels OOS

13.1 Oil Surge Vessel

<i>Device ID #</i>	009629	<i>Device Name</i>	Oil Surge Vessel
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Natco	<i>Operator ID</i>	Mezz.V-110
<i>Model</i>		<i>Serial Number</i>	7050401-02
<i>Location Note</i>			
<i>Device Description</i>	6' dia. x 20' long, 100 psi, 100°F.		

13.2 Water Surge Vessel OOS

<i>Device ID #</i>	009638	<i>Device Name</i>	Water Surge Vessel
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Natco	<i>Operator ID</i>	Mezz V-109
<i>Model</i>		<i>Serial Number</i>	7050401-01
<i>Location Note</i>			
<i>Device Description</i>	6' dia. x 20' long, 100 psi, 100°F.		

13.3 Annulus Separator (V-101) OOS

Device ID #	009630	Device Name	Annulus Separator (V-101)
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Natco	<i>Operator ID</i>	V-101
<i>Model</i>	878	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	3' dia x 10' long, 350 psi, 100°F.		

13.4 Monterey 3120 Group Trap Separator OOS

Device ID #	009651	Device Name	Monterey 3120 Group Trap Separator
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Natco	<i>Operator ID</i>	V-107
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	6.5' dia. x 20' long, 250 psi, 100°F.		

13.5 Stack Scrubber

Device ID #	009622	Device Name	Stack Scrubber
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Downey	<i>Operator ID</i>	V-127
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	6' dia. x 6' long, 90 psi, 80°F.		

13.6 Monterey 3242 Test Trap OOS

<i>Device ID #</i>	009654	<i>Device Name</i>	Monterey 3242 Test Trap
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	V-106
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	4' dia. x 15' long, 275 psi, 100°F. Replaced V-105		

14 Fugitive Hydrocarbon Components - CLP

14.1 Fugitives: Gas - Controlled

<i>Device ID #</i>	104755	<i>Device Name</i>	Fugitives: Gas - Controlled
<i>Rated Heat Input</i>		<i>Physical Size</i>	8591.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	3105-04
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	8591 clps - gas service		

14.2 Fugitives: Gas - Unsafe

<i>Device ID #</i>	104756	<i>Device Name</i>	Fugitives: Gas - Unsafe
<i>Rated Heat Input</i>		<i>Physical Size</i>	0.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	3105-05
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>			

14.3 Fugitives: Oil - Controlled OOS

<i>Device ID #</i>	<i>009601</i>	<i>Device Name</i>	Fugitives: Oil - Controlled
<i>Rated Heat Input</i>		<i>Physical Size</i>	3760.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	3105-02
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	3760 clps - oil service		

14.4 Fugitives: Oil - Unsafe OOS

<i>Device ID #</i>	<i>104754</i>	<i>Device Name</i>	Fugitives: Oil - Unsafe
<i>Rated Heat Input</i>		<i>Physical Size</i>	0.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	3105-03
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>			

15 Pigging Equipment OOS

15.1 Pig Launcher - Gas

<i>Device ID #</i>	<i>009794</i>	<i>Device Name</i>	Pig Launcher - Gas
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	Sp-134
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	One gas pig launcher with 0.67' diameter by 4' long.		

15.2 Pig Launcher - Oil OOS

<i>Device ID #</i>	009792	<i>Device Name</i>	Pig Launcher - Oil
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	Sp-132
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	One oil pig launcher with 0.67' diameter by 4' long.		

15.3 Pig Launcher - Utility

<i>Device ID #</i>	009793	<i>Device Name</i>	Pig Launcher - Utility
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	Sp-133
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	One utility gas pig launcher with 0.50' diameter by 4' long.		

16 Oil Pipeline to Shore OOS

<i>Device ID #</i>	009595	<i>Device Name</i>	Oil Pipeline to Shore
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	Line 6-PO-454-HC-D
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>			

17 **Gas Pipeline to Shore** OOS

<i>Device ID #</i>	009596	<i>Device Name</i>	Gas Pipeline to Shore
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	Line 6-PO-453-HC-E
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>			

18 **Surface Coating Operations**

<i>Device ID #</i>	005884	<i>Device Name</i>	Surface Coating Operations
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Including paints, primers, coatings solvents used for thinning and associated cleanup operations		

19 **Pumps**

19.1 **Pipeline Shipping Pump** OOS

<i>Device ID #</i>	107274	<i>Device Name</i>	Pipeline Shipping Pump
<i>Rated Heat Input</i>		<i>Physical Size</i>	250.00 Horsepower (Electric Motor)
<i>Manufacturer</i>	REDA	<i>Operator ID</i>	P-200
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Oil shipping Pump, 20,000 gpm		

22.2 Motor: Pipeline Shipping Pump OOS

<i>Device ID #</i>	009643	<i>Device Name</i>	Motor: Pipeline Shipping Pump
<i>Rated Heat Input</i>		<i>Physical Size</i>	250.00 Horsepower (Electric Motor)
<i>Manufacturer</i>	Reda	<i>Operator ID</i>	P-200
<i>Model</i>	66CT/ES	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Capacity = 583 gal/hour		

22.3 Stack Scrubber Pump

<i>Device ID #</i>	009646	<i>Device Name</i>	Stack Scrubber Pump
<i>Rated Heat Input</i>		<i>Physical Size</i>	1.00 Horsepower (Electric Motor)
<i>Manufacturer</i>	Dean	<i>Operator ID</i>	P-108
<i>Model</i>	PH-211	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>			

STATIONARY SOURCE SUMMARY

(Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District

COMPANY NAME: California State Lands Commission

➤ APCD USE ONLY ◀

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee*:

Date Application Deemed Complete:

I. SOURCE IDENTIFICATION

1. Source Name: Ellwood Stationary Source – Platform Holly
2. Four digit SIC Code: 1311 USEPA AIRS Plant ID (for APCD use only):
3. Parent Company (if different than Source Name): California State Lands Commission
4. Mailing Address of Responsible Official: 100 Howe Ave., Ste. 100, Sacramento, CA 95825
5. Street Address of Source Location (include Zip Code): Platform Holly, Parcel 3242-1, South Ellwood Offshore Field, 2 miles offshore of Goleta, CA 93117
6. UTM Coordinates (if required) (see instructions):
7. Source located within:

50 miles of the state line	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
50 miles of a Native American Nation	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Applicable
8. Type of Organization: Corporation Sole Ownership Government Partnership Utility Company
9. Legal Owner's Name: California State Lands Commission
10. Owner's Agent Name (if any): Title: Telephone #:
11. Responsible Official: Jennifer Lucchesi Title: Executive Officer CSLC Telephone #: (916) 574-1800
12. Plant Site Manager/Contact: Mike McManigal Title: Operations Supervisor Telephone #: (805) 961-2360
13. Type of facility: Oil & Gas Production
14. General description of processes/products: Oil & Gas Production
15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see Attachment A)? Yes No
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required? Not Applicable Yes No
(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.)

* Applications submitted without a filing fee will be returned to the applicant immediately as "improper" submittals

STATIONARY SOURCE SUMMARY (Form 1302-A2)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: California State Lands Commission	SOURCE NAME: Ellwood

II. TYPE OF PERMIT ACTION

	CURRENT PERMIT (permit number)	EXPIRATION (date)
<input type="checkbox"/> Initial SBCAPCD's Regulation XIII Application		
<input checked="" type="checkbox"/> Permit Renewal	PTO 8234-R11	December 2023
<input type="checkbox"/> Significant Permit Revision*		
<input type="checkbox"/> Minor Permit Revision*		
<input type="checkbox"/> Administrative Amendment		

III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve:
- a: Portable Source Voluntary Emissions Caps
 Acid Rain Source Alternative Operating Scenarios
 Source Subject to MACT Requirements [Section 112]
- b: None of the options in 1.a. are applicable
2. Is source operating under a Title V Program Compliance Schedule? Yes No
3. For permit modifications, provide a general description of the proposed permit modification:

* Requires APCD-approved NSR permit prior to a permit revision submittal

TOTAL STATIONARY SOURCE EMISSIONS (Form 1302-B)

APCD: Santa Barbara County Air Pollution Control District	➤ APCD USE ONLY ◀ APCD IDS Processing ID:
COMPANY NAME: California State Lands Commission	SOURCE NAME: Ellwood Stationary Source

I. TOTAL STATIONARY SOURCE EMISSIONS

POLLUTANT* (name)	POTENTIAL TO EMIT EMISSIONS (tons per year)	PRE-MODIFICATION EMISSIONS (tons per year)	EMISSIONS CHANGE (tons per year)
NOx	108.36	108.36	0.00
ROC	75.71	75.71	0.00
CO	104.64	104.64	0.00
PM	6.56	6.56	0.00
PM-10	6.45	6.45	0.00
SOx	3.57	3.57	0.00

* Emissions for all pollutants for which the source is major and for all NSPS/MACT-regulated air pollutants must be reported. HAP emissions must be determined, and those exceeding one ton per year from any emission unit category must also be quantified; if less than one ton per year, just list the HAPs emitted by name.

COMPLIANCE PLAN (Form 1302-I1)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: California State Lands Commission	SOURCE NAME: Ellwood Stationary Source

I. PROCEDURE FOR USING FORM 1302-I

- ☞ This form shall be submitted as part of the SBCAPCD's Regulation XIII Application. The Responsible Official shall identify the applicable federal requirement(s) to which the source is subject. In the Compliance Plan (Form 1302-I), a Responsible Official shall identify whether the source identified in the SBCAPCD's Regulation XIII Application currently operates in compliance with all applicable federal requirements.

II. APPLICABLE FEDERAL REQUIREMENTS

Applicable Federal Requirement ¹		Affected Emission Unit	In compliance? (yes/no/ exempt ³)	Effective Date ⁴
Regulatory Reference ²	Regulation Title ²			
40 CFR Parts 51 & 52	Nonattainment Area Review and Prevention of Significant Deterioration	Entire Facility	Yes	in effect
40 CFR Part 60, Subpart IIII	NSPS for Stationary Compression Ignition Internal Combustion Engines	Holly Crane Engine ID# 111506	Yes	in effect
40 CFR Part 63, Subpart ZZZZ	NESHAP for Reciprocating Internal Combustion Engines	EOF & Holly Reciprocating Internal Combustion Engines	Yes	in effect
40 CFR Part 64	Compliance Assurance Monitoring	IC Engines (ID#s 111506	Yes	in effect
40 CFR Part 70	Operating Permits	Entire Facility	Yes	in effect
See Attached - Applicable Federal Requirements				

SANTA BARBARA COUNTY APCD, VENOCO ELLWOOD STATIONARY SOURCE, FORM 1302-11 (CONT'D)

- 1 Review APCD SIP Rules, NSPS, NESHAPS, and MACTs .
- 2 Regulatory Reference is the abbreviated citation (e.g. 40 CFR 60 Subpart OOO, APCD Rule 325.H) and Title is the prosaic title (e.g. NSPS Standards of Performance for Nonmetallic Mineral Processing Plants, Crude Oil Production and Separation, Inspection)
- 3 If exempt from applicable federal requirement, include explanation for exemption.
- 4 Indicate the date during the permit term that the applicable federal requirement will become effective for the emission unit.
- 5 All environmentally significant permit conditions -- such as emission, operation, and throughput limitations or compliance monitoring conditions associated with such limitations -- listed in all authority to construct (ATC) permits issued to the Part 70 source are also applicable requirements.

*** If more than one page is used, please ensure that "Santa Barbara APCD", stationary source name and "Form 1302-11" appear on each page. ***

II. APPLICABLE FEDERAL REQUIREMENTS

SANTA BARBARA COUNTY APCD, VENOCO ELLWOOD STATIONARY SOURCE, FORM 1302-11 (CONT'D)

Applicable Federal Requirement				
Regulatory Reference	Regulation Title	Affected Emission Unit	In Compliance?	Effective Date
Generic Federally-Enforceable APCD Rules				
Rule 101	Compliance by Existing Installations	All emission units	Yes	in effect
Rule 102	Definitions	All emission units	Yes	in effect
Rule 103	Severability	All emission units	Yes	in effect
Rule 201	Permits Required	All emission units	Yes	in effect
Rule 202	Exemptions to Rule 201	Emission units listed on PTO Attachment 10.6	Yes	in effect
Rule 203	Transfer	All emission units	Yes	in effect
Rule 204	Applications	All emission units	Yes	in effect
Rule 205	Standards for Granting Permits	All emission units	Yes	in effect
Rule 206	Conditional Approval of ATC or PTO	All emission units	Yes	in effect
Rule 207	Denial of Applications	All emission units	Yes	in effect
Rule 208	Action on Applications – Time Limits	All emission units. Not applicable to Part 70 Permit applications.	Yes	in effect
Rule 212	Emission Statements	All emission units	Yes	in effect
Rule 301	Circumvention	All emission units	Yes	in effect
Rule 302	Visible Emissions	All emission units	Yes	in effect
Rule 303	Nuisance	All emission units	Yes	in effect
Rule 305	PM Concentration – Southern Zone	Each PM source	Yes	in effect
Rule 309	Specific Contaminants	All emission units	Yes	in effect
Rule 311	Sulfur Content of Fuel	All combustion units	Yes	in effect
Rule 317	Organic Solvents	Emission units using solvents	Yes	in effect
Rule 321	Solvent Cleaning Operations	Emission units using solvents	Yes	in effect
Rule 322	Metal Surface Coating Thinner and Reducer	Emission units using solvents	Yes	in effect
Rule 323	Architectural Coatings	Paints used in maintenance & surface coating activities	Yes	in effect
Rule 324	Disposal and Evaporation of Solvents	Emission units using solvents	Yes	in effect
Rule 353	Architectural Coatings	Units using adhesives/sealants	Yes	in effect

SANTA BARBARA COUNTY APCD, VENOCO ELLWOOD STATIONARY SOURCE, FORM 1302-11 (CONT'D)

Applicable Federal Requirement				
Regulatory Reference	Regulation Title	Affected Emission Unit	In Compliance?	Effective Date
Rule 505.A,B1,D	Breakdown Conditions	All emission units	Yes	in effect
Rule 603	Emergency Episode Plans	Stationary sources with PTE greater than 100 tpy	Yes	in effect
Reg. VIII	New Source Review	All emission units	Yes	in effect
Reg. XIII Rules 1301-1305	Part 70 Operating Permits	All emission units	Yes	in effect
Unit-Specific Federally-Enforceable APCD Rules				
Rule 316	Storage and Transfer of Gasoline	EOF Gasoline supply pump	Yes	in effect
Rule 330	Surface Coating of Metal Parts & Products	All surface coating used for any metal coating operations.	Yes	in effect
Rule 333	Control of Emissions from Reciprocating IC Engines	Holly Crane ICE, ID# 111506	Yes	in effect
Rule 359	Flares and Thermal Oxidizers	Holly Flare ID#s 7982	Yes	in effect

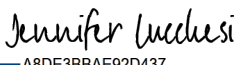
COMPLIANCE PLAN (Form 1302-I2)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: Venoco LLC California State Lands Commission	SOURCE NAME: Ellwood Stationary Source

III. COMPLIANCE CERTIFICATION

Under penalty of perjury, I certify the following:

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) with which the source is in compliance identified in form 1302-I1;**
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with the future-effective applicable federal requirement(s) identified in form 1302-I1, on a timely basis¹;**
- Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance with the applicable federal requirement(s), identified in form 1302-I1, and I have attached a compliance plan schedule.²

<p style="margin: 0;"><small>DocuSigned by:</small></p> <div style="border: 1px solid black; border-radius: 50%; padding: 5px; display: inline-block;">  </div> <p style="margin: 0;"><small>A8DE3BBAE92D437</small></p>	<p style="margin: 0;">6/27/2023</p>
Signature of Responsible Official	Date

1. Unless a more detailed schedule is expressly required by the applicable federal requirement.
2. At the time of expected permit issuance, if the source expects to be out of compliance with an applicable federal requirement, the applicant is required to provide a compliance schedule with this application, with the following exception. A source which is operating under a variance that is effective for less than 90 days need not submit a Compliance Schedule. For sources operating under a variance, which is in effect for more than 90 days, the Compliance Schedule is the schedule that was approved as part of the variance granted by the hearing board.

The compliance schedule shall contain a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with this applicable federal requirement. For sources operating under a variance, the compliance schedule is part of the variance granted by the hearing board. The compliance schedule shall resemble, and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. For sources not operating under a variance, consult the Air Pollution Control Officer regarding procedures for obtaining a compliance schedule.

CERTIFICATION STATEMENT (Form 1302-M)

APCD: Santa Barbara County Air Pollution Control District	➤ APCD USE ONLY ◀ APCD IDS PROCESSING ID:
COMPANY NAME: California State Lands Commission	SOURCE NAME: Ellwood Stationary Source

Identify, by checking off below, the forms and attachments that are part of your application. If the application contains forms or attachments that are not identified below, please identify these attachments in the blank space provided below. Review the instructions if you are unsure of the forms and attachments that need to be included in a complete application.

Forms included with application

Stationary Source Summary Form

Total Stationary Source Emission For Compliance Plan Form

Compliance Plan Form

Compliance Plan Certification Form

Exempt Equipment Form

Certification Statement Form

List other forms or attachments

- _____

[] check here if additional forms listed on back

Attachments included with application

Description of Operating Scenarios

Sample emission factors

Fugitive emission estimates

List of Applicable requirements

Discussion of units out of compliance with applicable federal requirements and, if required, submit a schedule of Compliance

Facility schematic showing emission points

NSR Permit

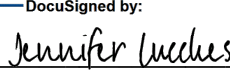
PSD Permit

Compliance Assurance monitoring protocols

Risk management verification per 112(r)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in SBCAPCD's Regulation XIII, Rule 1301 or USEPA's 40 CFR Part 70.

DocuSigned by:


Signature of Responsible Official:

6/27/2023

Date:

Print Name of Responsible Official: Jennifer Lucchesi

Title of Responsible Official and Company Name: Executive Officer, California State Lands Commission

**CERTIFICATION STATEMENT
(Form 1302-M continued)**

APCD: Santa Barbara County Air Pollution Control District	➤ APCD USE ONLY ◀ APCD IDS PROCESSING ID:
COMPANY NAME: California State Lands Commission/Beacon West Energy Group, LLC	SOURCE NAME: Ellwood Stationary Source

List Other Forms or Attachments (cont.)

N/A



SBAPCD RULE 202 - De Minimus Tracking Log

Facility: Platform Holly

Facility Type: Offshore Platform

Project Date:	Originator:	Project:	Controlled ROC Emission (lbs/Day):
			0.07
7/1/1998	I & M Inspector	Miscellaneous additions in 3rd quarter - 1998	0.05
10/1/1998	I & M Inspector	Miscellaneous additions in 4th quarter - 1998	0.05
1/1/1999	I & M Inspector	Miscellaneous additions in 1st quarter - 1999	0.05
4/1/1999	I & M Inspector	Miscellaneous additions in 2nd quarter - 1999	0.19
5/19/1999	Bob Van Nostrand	HOLL-99-0020, HOLL-00-0045 - Flare installation	1.20
5/20/1999	Bob Van Nostrand	HOLL-99-0024 - Add PSL on REDA pump disch	0.03
5/20/1999	Bob Van Nostrand	HOLL-99-0025 - V-146 (WS Cylinder 1 3rd Stage	0.00
7/1/1999	I & M Inspector	Miscellaneous additions in 3rd quarter - 1999	0.35
10/1/1999	I & M Inspector	Miscellaneous additions in 4th quarter - 1999	0.35
12/28/1999	Bob Van Nostrand	HOLL-99-0037 - Add PSH-155/156 to annulus lin	0.10
12/28/1999	Bob Van Nostrand	HOLL-99-0038 - Add PSL-154, PSL-158, PSL-130	0.10
1/1/2000	I & M Inspector	Miscellaneous additions in 1st quarter - 2000	0.13
4/1/2000	I & M Inspector	Miscellaneous additions in 2nd quarter - 2000	0.10
5/15/2000	Bob Van Nostrand	HOLL-00-0043 - New pilots on wells	1.59
7/1/2000	I & M Inspector	Miscellaneous additions in 3rd quarter - 2000	0.04
10/1/2000	I & M Inspector	Miscellaneous additions in 4th quarter - 2000	0.08
8/4/2001	Greg Marsh	MOC: HOLL-01-0063 - Reconfigure well tree valv	0.03
8/8/2001	Walt McCarty	MOC: HOLL-01-0056 - Rig generator engine fuel	0.47
10/4/2001	Bob Van Nostrand	MOC: HOLL-01-0066 - Install isola. Vlvs. For test	0.85
1/23/2002	Jeff MacDonald	MOC: HOLL-02-0067 - Fuel gas for gen set's #1,	0.17
8/27/2002	Bob Van Nostrand	MOC: HOLL-02-0068 - Install PSV-117A/B	0.28
9/11/2002	Sally English	HOLL-02-072, Installation of new chemical skid	1.62
10/28/2002	Rob Campbell-Tayl	MOC: HOLL-02-74, Holly wellbay modifications	0.01
2/11/2003	Sally English	HOLL-03-076, 4" crossover between 3120 & 324	0.01
4/9/2003	Sally English	HOLL-03-077, 2" flowlines to 3242-7	0.01
12/8/2003	Jeff MacDonald	MOC: HOLL-03-79, New chemical pump	0.90
12/8/2003	Jeff MacDonald	MOC: HOLL-03-80, REDA pump bypass, strainer	0.01
8/12/2004	Bob Van Nostrand	Holl-04-082; ESP & associated piping installation	0.19



SBAPCD RULE 202 - De Minimus Tracking Log

Facility: Platform Holly

Facility Type: Offshore Platform

Project Date:	Originator:	Project:	Controlled ROC Emission (lbs/Day):
9/15/2006	Walt McCarty	Well 3120-15 Modification's	0.09
9/15/2006	Walt McCarty	Well 3242-18 Modification's	0.00
9/15/2006	Walt McCarty	Well 3120-12 Modification's	0.00
9/15/2006	Walt McCarty	Well 3120-16 Modification's	0.00
9/15/2006	Walt McCarty	Well 3242-19 Modification's	0.00
9/15/2006	Walt McCarty	Well 3120-13 Modification's	0.00
9/19/2006	Walt McCarty	Well 3242-9 Modification's	0.00
6/28/2007	Chris Fox	HOLL-07-099, Addition of PSV-183 on 3120-11	0.00
11/26/2007	Teddy Sagun	HOLL-07-103, V-106,109 tie in's,isolation pt./line	0.00
12/22/2008	Walt McCarty	HOLL-07-0098; Installation of heater treater	0.00
1/28/2009	Joel Toreja	HOLL-08-0110, Fuel gas filter installation	0.12
8/27/2009	Walt McCarty	HOLL-09-0115 - V-106 make-up gas line	0.00
9/24/2009	Bob Manning	HOLL-09-116 - Install V-106 vent line	0.00
7/8/2010	Bob Van Nostrand	MOC: HOLL-10-117, Low Pressure Flare drip leg	0.00
3/1/2012	Bob Van Nostrand	install V-100 overhead line (fuel gas to rig gens)	0.42
3/29/2012	Bob Van Nostrand	HOLL-12-121 V-106 bypass to V-150	0.39
5/10/2013	Bob Van Nostrand	Well 3242-12 flow line	0.21
6/19/2013	Bob Van Nostrand	V-101 Intermediate Level Alarms - High/Low	0.06
6/19/2014	Bob Van Nostrand	Well 3242-18 re-route casing gas line	0.07
6/19/2014	Bob Van Nostrand	V-116 re-pipe Cond. Dump Line	0.01
11/15/2019	Ryan Referente	LP Flare tie in	0.48
Aggregate Total Controlled ROC Emissions (lbs/day) as of 5/31/2023:			10.88