

BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
MINUTE ORDER

BETA OFFSHORE OPERATING, LLC
111 W. Ocean Boulevard
Long Beach, CA 90802

Case No: 5855-7
Facility ID: 166073

Hearing Date: 12/07/2023

Hearing Type: Regular

Consent Calendar:

HEARING BOARD ACTION

Action: Granted

Starting Date: 12/31/2023

Ending Date: 11/16/2024

RULES

203(b) {from Permit Condition Nos. A63.15, A63.16, D12.8, D12.9, D12.10, D12.11, D12.12, D12.13, D12.14, D29.5, D29.6, E193.2, E448.4, E448.9, H23.19, and H23.10 of Facility Permit No. 166073}

1100(d)(1)(B)

1110.2(d), (e)(2), (e)(4), (e)(10), (f)(1)(C), and (F)(1)(D)

1134(d)(3), (e)(2), and (e)(3)

2004(f)(1) {from Permit Condition Nos. A63.15, A63.16, D12.8, D12.9, D12.10, D12.11, D12.12, D12.13, D12.14, D29.5, D29.6, E193.2, E448.4, E448.9, H23.19, and H23.10 of Facility Permit No. 166073}

2012

3002(c)(1) {from Permit Condition Nos. A63.15, A63.16, D12.8, D12.9, D12.10, D12.11, D12.12, D12.13, D12.14, D29.5, D29.6, E193.2, E448.4, E448.9, H23.19, and H23.10 of Facility Permit No. 166073}

EQUIPMENT DESCRIPTION	DEVICE/APPLICATION/PERMIT
Internal Combustion Engines (ICE)	D81, D82, D83, D84, D85, and D86
Selective Catalytic Reduction (SCR) Unit	C197, C198, C199, C200, C201, C202, C203, C204, and C205
Gas Turbines	D95, D96, D97, D98, D99, and D100
Urea Injection System	

CONDITIONS

"Saturn Turbines" – Device id Nos. D95, D96 and D97

1. Petitioner shall cease operation of the three Saturn Turbines according to the following schedule:

- a. For at least one of the three Saturn Turbines, within thirty (30) days of receipt of the electrical and control system for the replacement electric motor and no later than February 15, 2024.
 - b. For the second of the three Saturn Turbines, within thirty (30) days of completing the commissioning of the replacement electric motor for the second Saturn Turbine and no later than March 1, 2024.
 - c. For the third of the Saturn Turbines, within thirty (30) days of completing the commissioning of the replacement electric motor for the second Saturn Turbine and no later than April 1, 2024.
2. Selection of the sequence of ceasing operation of each Saturn Turbine shall be at the discretion of Petitioner subject to the timeline set forth in Condition 1.
 3. Within thirty (30) days of removing all Saturn Turbines, Petitioner shall submit a Form 200-C Request to Inactivate a Permit to Operate for Devices D95, D96 and D97.

“Centaur Turbine” – Device ID Nos. D98, D99, and D100

4. Petitioner shall, within sixty (60) days of issuance of this Order, submit a source test protocol to the District to determine Rule 1134 compliance for the Centaur Turbines.
5. Petitioner shall complete the retrofit of the Centaur Turbines according to the following schedule:
 - a. Within seventy-five (75) days of receipt of the selective catalytic reduction (“SCR”) system for at least one of the Centaur Turbines and no later than May 30, 2024.
 - b. For the second of the three Centaur Turbines, within sixty (60) days of completing the commissioning of the first Centaur Turbine and no later than July 31, 2024. (Commissioning is required to ensure the safety and reliability of each device and includes processes and tests to ensure all systems and components have been installed, hooked up, and programmed properly. This also includes management of change (MOC), pre-start safety review (PSSR) and quality assurance/quality control (QA/QC) signoffs by the company.)
 - c. For the third of the three Centaur Turbines, within sixty (60) days of completing the commissioning of the prior two Centaur Turbines and no later than September 30, 2024.
6. Selection of the sequence of retrofitting each Centaur turbine shall be at the discretion of Petitioner subject to the timeline set forth in Condition 5.
7. At any time after the retrofit of a Centaur Turbine is completed, but no later than thirty (30) days after completing the retrofit for all three Centaur Turbines, Petitioner shall conduct a source test pursuant to the requirements of the approved source test protocol to demonstrate Rule 1134 compliance.
8. Within sixty (60) days of completing the source test, Petitioner shall submit a copy of the source test results for each Centaur Turbine to South Coast AQMD by email to AQ Engineer 1 Kaesean Brown (kbrown1@aqmd.gov) and AQ Inspector II Adam Tavasolian (atavasolian@aqmd.gov).
9. During the term of this variance, Petitioner shall operate no more than any two of the three Centaur Turbines at a given time, except in the event of an emergency that creates a risk to the health and safety of personnel and/or environment that cannot be avoided without operating an additional Centaur Turbine.
10. Petitioner shall maintain a monthly usage log for the Centaur Turbine and send log records to South Coast AQMD by email to AQ Engineer 1 Kaesean Brown (kbrown1@aqmd.gov) and AQ Inspector II Adam Tavasolian (atavasolian@aqmd.gov) by the first Tuesday of each month starting January 2024. The log shall contain at minimum:
 - a. Date and total hours of operation, including start and end time, for each turbine identified by Device ID No.;
 - b. Date and total quantity of fuel usage for each turbine identified by Device ID No.;

- c. If a turbine was operated in the case of an emergency as identified in Condition 9, then:
 - i. Basis for the emergency;
 - ii. Date and total hours of operation, including start and end time, under emergency for each turbine identified by Device ID No.; and
 - iii. Date and total quantity of fuel usage under emergency for each turbine identified by Device ID No.

Internal Combustion Rig Engines – Device ID Nos. D81, D82, D83, D84, D85, and D86

11. Petitioner shall, within sixty (60) days of issuance of this Order, submit a source test protocol to the District for approval to determine Rule 1110.2 compliance for the Internal Combustion Rig Engines.
12. Petitioner shall retrofit the six Internal Combustion Rig Engines to demonstrate compliance with Rule 1110.2(d),(1) according to the following schedule:
 - a. For at least one of the six Rig Engines, within fourteen (14) days of completion of structural modification and deck extension on Platform Eureka;
 - b. For the second of the six Rig Engines, within fourteen (14) days of completing the commissioning of the retrofit of the previously selected Rig Engine pursuant to Condition 12a.;
 - c. For the third of the six Rig Engines, within fourteen (14) days of completing the commissioning of the retrofit of the previously selected Rig Engine pursuant to Condition 12b.;
 - d. For the fourth of the six Rig Engines, within fourteen (14) days of completion of structural modification and deck extension on Platform Ellen;
 - e. For the fifth of the six Rig Engines, within fourteen (14) days of completing the commissioning of the retrofit of the previously selected Rig Engine pursuant to Condition 12d.;
 - f. For the sixth of the six Rig Engines, within fourteen (14) days of completing the commissioning of the previously selected Rig Engine pursuant to Condition 12e.
13. NUMBER OMITTED
14. Selection of the sequence of retrofitting each Rig Engine shall be at the discretion of Petitioner subject to the schedule set forth in Condition 12.
15. At any time after the retrofit of an Internal Combustion Rig Engine is completed, but not later than thirty (30) days after completing the retrofit for all six Internal Combustion Rig Engines, Petitioner shall conduct a source test pursuant to the requirements of the approved source test protocol to demonstrate Rule 1110.2 compliance.
16. Within sixty (60) days of completing the source test, Petitioner shall submit a copy of the source test results for each Centaur Turbine to South Coast AQMD by email to AQ Engineer I Kaesean Brown (kbrown1@aqmd.gov) and AQ Inspector II Adam Tavasolian (atavasolian@aqmd.gov).
17. During the term of this variance, Petitioner shall operate no more than three of the six Internal Combustion Rig Engines at a given time, except in the event of an emergency that creates a risk to the health and safety of personnel and/or environment that cannot be avoided without operating one or more additional rig engine(s).
18. Petitioner shall maintain a monthly usage log for the Internal Combustion Rig Engines and send log records to South Coast AQMD by email to AQ Engineer I Kaesean Brown (kbrown1@aqmd.gov) and AQ Inspector II Adam Tavasolian (atavasolian@aqmd.gov) by the first Tuesday of each month starting January 2024. The log shall contain at minimum:
 - a. Date and total hours of operation, including start and end time, for each engine identified by Device ID No.;

- b. Date and total quantity of fuel usage each engine identified by Device ID No.; and
- c. If an Internal Combustion Rig Engine was operated in the case of an emergency as identified in Condition 17, then:
 - i. Basis for the emergency;
 - ii. Date and total hours of operation, including start and end time, under emergency for each Internal Combustion Rig Engine identified by Device ID No. ; and
 - iii. Date and total quantity of fuel usage under emergency for each Internal Combustion Rig Engine identified by Device ID Nos.

Generally Applicable Conditions

- 19. Petitioner shall request expedited review and processing of both the Source Test Protocol and the Source Test report by submitting the Expedited Evaluation request Form 222-XST.
- 20. The Parties shall appear before the Hearing Board for a status/modification hearing in April 2024.
- 21. Petitioner shall calculate and pay excess emission fees to the Clerk of the Board no later than February 29, 2024, for January excess emissions, and subsequently no later than the 30th of each month for the previous month, or the variance will be invalidated pursuant to Rule 303(k).
- 22. Petitioner shall notify the Clerk of the Board in writing at clerkofboard@aqmd.gov when final compliance has been achieved.
- 23. As this is a Title V facility, Petitioner shall notify US EPA of this Order promptly after its issuance in accordance with its Title V obligations.

EXCESS EMISSIONS

NOx: 1964 lbs/day

Failure to comply in full with any and all conditions and increments of progress may result in modification or revocation of this order by the Hearing Board, and/or enforcement actions by the South Coast AQMD.

REMINDER

The Parties shall appear before the Hearing Board for a status/modification hearing in April 2024.

Present:

Cynthia Verdugo-Peralta, Chair
Robert Pearman, Esq., Vice Chair
Jerry P. Abraham, M.D., MPH, CMQ
Micah Ali
Mohan Balagopalan

Representing the Petitioner: Ivan Tether, Attorney at Law

Representing the Respondent: Josephine Lee, Senior Deputy District Counsel

Witness for the Petitioner: Jeff Ortloff, Director of Facilities Engineering, Amplified Energy Corp.
Don Barkley, Senior Engineer, Yorke Engineering
Cory Whidden, Manager Director of Compliance Project

Petitioner's Exhibits:

- *#1 - Notice of Violation No. P79006
- *#2 - Compliance Timeline
- *#3 - Facility Permit to Operate No. 166073
- *#4 - PowerPoint, Beta Field Federal OCS-P0300, 0301, 0306
- *#5 - Cover letter and Updated Compliance Timeline
- *#6 - Declaration of Jeff Ortloff
- *#7 - Revised Excess Emissions Calculations

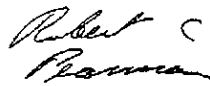
Respondent's Exhibits: A - Proposed Variance Conditions

*Entered into Evidence

Motion: Fearman/Ali 4-1, Balagopalan votes No.

Board

Review/Approval



Robert Pearman, Vice Chair

Dated 12/15/23

Prepared by Altheresa Rothschild

