

Faye Thomas

From: Clerk of Board
Sent: Friday, July 12, 2024 4:50 PM
To: Faye Thomas
Subject: RE: Case 5855-7, Beta Offshore, Consent Calendar
Attachments: 2024-7-18 Beta-5855-7 - Copies requested by M Balagopalan.pdf

Importance: High

Attached is board member comments and parties' response for approval for consent calendar. Attached is an additional document requested by Mohan. Please post to meet 72 hour requirement. I already emailed the initial documents requesting consent calendar approval.

From: Mohan Balagopalan <mbalagopalan@aqmd.gov>
Sent: Friday, July 12, 2024 11:47 AM
To: Clerk of Board <Front_PC@aqmd.gov>
Subject: Fwd: Case 5855-7, Beta Offshore, Consent Calendar

Hi,
I appreciate the responses and have no objections for this Case to be heard on Consent Calendar. Thanks.

Mohan Balagopalan

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From: Clerk of Board <Front_PC@aqmd.gov>
Sent: Friday, July 12, 2024 10:35:00 AM
To: Mohan Balagopalan <mbalagopalan@aqmd.gov>
Subject: FW: Case 5855-7, Beta Offshore, Consent Calendar

From: Ivan Tether <ivan@tetherlaw.com>
Sent: Friday, July 12, 2024 10:32 AM
To: Clerk of Board <Front_PC@aqmd.gov>; Clerk of Board <ClerkofBoard@aqmd.gov>; Josephine Lee <jlee4@aqmd.gov>
Subject: [EXTERNAL] FW: Case 5855-7, Beta Offshore, Consent Calendar

Good morning, Clerk of the Board and Senior Deputy District Counsel Josephine Lee,

Thank you for the opportunity to respond to Hearing Board Member Balagopalan's comments, suggestions and request.

Beta Offshore Operating, LLC's ("Beta's") responses follow each of the comments, suggestions and request, below.

Thank you again for providing this opportunity to respond. Please don't hesitate to contact me with any further questions.

We appreciate the Hearing Board's consideration of Beta's request that its Petition for Modification of a Variance Condition be heard on the Hearing Board's Consent Calendar.

Respectfully submitted, Ivan Tether for Beta Offshore Operating, LLC

Ivan Tether / TETHER LAW

(213) 716-6422 / ivan@tetherlaw.com

WEB: tetherlaw.com

41 Winchester Drive, Unit 304, Portland, ME 04103

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From: Clerk of Board <Front_PC@aqmd.gov>

Sent: Thursday, July 11, 2024 3:31 PM

To: Ivan Tether <ivan@tetherlaw.com>; Josephine Lee <JLee4@aqmd.gov>

Subject: FW: Case 5855-7, Beta Offshore, Consent Calendar

From: Mohan Balagopalan

Sent: Thursday, July 11, 2024 12:12 PM

To: Clerk of Board <Front_PC@aqmd.gov>

Subject: Re: Case 5855-7, Beta Offshore, Consent Calendar

Hi,

I have a few comments, suggestions and a request.

Comments.

1. Please note that the Excess Emission fee rate for Fiscal Year, 2024/2025 becomes effective July 1, 2024, and payments for Excess emission that occur after July 1, 2024, have to be adjusted accordingly. The current rate is \$4,433.99/ton for NOx and the rate effective July 1, 2024, is \$4,589.18 (See Table I, Rule 303).

We appreciate this helpful reminder. It has been communicated to Yorke Engineering, which prepares the draft calculation of excess emission fees required under Condition 21 of the Variance. As Beta's counsel, I too am aware of and appreciate the reminder of this fee increase.

2. What about the timeline for the 3rd Centaur Turbine. The current condition states that the retrofit should occur within 60 days of completing the commissioning of the prior two Centaur Turbines and no later than October 15th, 2024. The requested revised date for the second Centaur Turbine is no later than September 29, 2024. Can the 3rd Centaur Turbine be retrofitted no later than October 15, 2024.

Beta Offshore's ("Beta's") current determination of timing with regard to the 3rd Centaur Turbine indicates that Beta will have adequate time including some leeway for potential delay to complete that 3rd retrofit on or before October 15, 2024.

Suggestions:

3. I suggest removing the ‘no later date’ for each of the Centaur turbines and keep the timeline based on Commissioning of the turbines. This will provide operational flexibility and would not require further modification of the Order should there be further delays in the retrofits and potential delays that may occur due to the commissioning of the turbines keeping in mind that the driver to come into compliance is the current end date of the Variance is November 16th 2024. Thank you for this suggestion. With the date extensions currently requested under the pending Petition, however, Beta will have adequate time including some leeway for potential delay to meet those requested dates for retrofit of the 1st and 2nd Centaur Turbines as well as the October 15, 2024 date for retrofit of the 3rd Centaur Turbine.

4. Request to extend the end date of the regular variance to December 30, 2024, keeping it effectively under one year from the start date of the Variance of Dec 31, 2023. Any request to modify this new end-date beyond a year will require a schedule of Increments of Progress pursuant to Health & Safety Code 42358(b). This request to modify to extend beyond a year, if needed, should be filed at least 45 days before December 29, 2024. We appreciate this reminder as well, including the fact that there remains time between the final compliance date and the late December date to which an extension could be granted without triggering the requirement for a schedule of Increments of Progress. Given that certain events, including extreme weather, can yield unforeseen delay, Beta continues to evaluate this possibility. Beta is aware that a Petition for Modification/Extension of a Final Compliance must be filed at least 45 days before the existing final compliance date of November 16, 2024. The deadline for such filing has been calendared for Beta.

Request

5. Please provide copies of the letters that was sent to USEPA Region 9 regarding this variance and any responses.

Copies of Forms referencing and related to the Variance are attached to this email.

Thanks.

Mohan Balagopalan

Thank you. Again, we appreciate your questions, suggestions and request. We appreciate the opportunity to respond, as well as your consideration of our request that Beta’s Petition for Modification of Variance Condition be heard on the Consent Calendar of the Hearing Board.

Respectfully submitted, Ivan Tether for Beta Offshore Operating, LLC

From: Clerk of Board <Front_PC@aqmd.gov>

Sent: Thursday, July 11, 2024 9:06 AM

Subject: FW: Case 5855-7, Beta Offshore, Consent Calendar

Attached are documents requesting to be placed on the Hearing Board's Consent Calendar. Please review and let me know **by 4:00p on July 12, 2024**, whether this matter may be heard on the consent calendar.

From: Ivan Tether <ivan@tetherlaw.com>
Sent: Thursday, July 11, 2024 8:50 AM
To: Clerk of Board <ClerkofBoard@aqmd.gov>
Cc: Josephine Lee <jlee4@aqmd.gov>
Subject: [EXTERNAL] FW: Case 5855-7, Beta Offshore, Consent Calendar

Dear Clerk of the Board,

Beta Offshore Operating, LLC respectfully requests that Case Number 5855-7, Beta's Petition for Modification of a Variance Condition set for hearing on July 18, 2024, be heard on the Hearing Board's Consent Calendar.

Attached are the final Consent Calendar documents. We will send the eight physical copies by FedEx on Monday, July 15 for delivery mid-morning of Tuesday, July 16.

- The Stipulation requesting that the Hearing Board hear the Petition for Modification on the Consent Calendar, signed by Josephine Lee and Ivan Tether
- The Declaration of Jeff Ortloff in support of the Petition
- The Attachments A-D to Jeff Ortloff's Declaration
- The Declaration of Ivan Tether in support of the Petition
- The Proposed Findings and Decision

Thank you. Please don't hesitate to contact me with any questions.

Beta Offshore appreciates the opportunity to have its Petition heard by the Hearing Board

Best Regards, Ivan Tether for Beta Offshore Operating, LLC

Ivan Tether / TETHER LAW
(213) 716-6422 / ivan@tetherlaw.com

WEB: tetherlaw.com

41 Winchester Drive, Unit 304, Portland Maine 04103



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Section I - Operator Information

1. Facility Name (Business Name of Operator That Appears On Permit): Beta Offshore OCS Parcels P300/P301

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

3. This report is based on the applicable rules, permit terms and requirements as specified in Sections A through K and Appendices A and B inclusive, and any compliance plans, variances, and alternative operating conditions in effect during the permit term of the Title V Facility Permit to Operate issued on: 02/19/2021
(mo/day/year)

4. This report is due: 03/01/2024 and covers the period from: 01/01/2023 to: 12/31/2023
(mo/day/year) (mo/day/year) (mo/day/year)

5. This report supersedes an Annual Compliance Certification previously submitted on: 03/06/2023
(mo/day/year)

Section II - Annual Compliance Certification Report *

1. Compliance Status for the Reporting Period:
- a. This facility has been in compliance with all terms and conditions in the Title V permit as referenced in Section I.
 - b. This facility has been in compliance with all of the terms in the Title V permit as referenced in Section I, except non-compliance for:
(Attach additional pages as needed.)

Permit Condition Or Rule Number(s)	Device Number(s)	Was Form 500-C2 previously submitted for the non-compliance? (Attach additional sheets as necessary)	
See Attached Minute	D81 through D86	<input type="radio"/> Yes, on: _____ (mo/day/year)	<input checked="" type="radio"/> No, Form 500-C2 is attached to this report
Order 5855-7, page 1	C197 through C202	<input type="radio"/> Yes, on: _____ (mo/day/year)	<input checked="" type="radio"/> No, Form 500-C2 is attached to this report
		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-C2 is attached to this report
		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-C2 is attached to this report

2. The methods used for determining the compliance status are:
- a. Entirely consistent with the applicable requirements in the permit terms and conditions of the Title V permit.
 - b. Partially consistent with the applicable requirements in the permit terms and conditions of the Title V permit, with the exception of:
Describe in detail how the methods used are different from those listed in the permit and to what extent the devices or operations at the facility are impacted. Attach additional pages as necessary.

* Additional information may be required to comply with Section K Condition 24 of your Title V permit.

3. Compliance is:

- a. Continuous
- b. Intermittent

If Intermittent, describe intermittent compliance in detail. Attach additional pages as necessary.

Beta Offshore submitted a petition for a Regular Variance on 10/20/2023, and the Variance was granted on 12/7/2023 by the Hearing Board, for a coverage period from 12/31/2023 through 11/16/2024. The Minute Order Case No. 5855-7 is attached. Note that other equipment and associated rules and permit conditions are noted in Minute Order Case No. 5855-7, such as those applicable to Rule 1134, and were in compliance as the effective date for those equipment items and applicable rules and permit conditions is January 1, 2024, outside of this compliance period.

D81 and D82 engines non-compliant with VOC limits from July 2023 source test; calculated and paid excess emissions; re-tested in November 2023 with passing VOC results.

4. Are there any other facts or circumstances that have been required to determine the compliance status of the facility (e.g., compliance plans, terms of a variance, or order of abatement)?


- a. No
- b. Yes

If Yes, Please Explain

Beta Offshore is currently operating under a Regular Variance and the conditions of Minute Order Case No. 5855-7, and is following the schedule for significant milestones which include the modification of the Rig Engines D81 through D86 by installing the Selective Catalytic Reduction units C197 through C202, and submission of monthly usage logs, excess emissions calculations, and excess emissions fee payments, all per the schedules listed in the attached Minute Order and the attached Forms 500-C2.

Section III - Responsible Official Signature Statement

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 statements 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: Director, Facilities Engineering
3. Print Name: Jeff Ortloff	4. Date: 02/28/2024
5. Phone #: (832) 219-9034	6. Fax #:
7. Address of Responsible Official: 500 Dallas Street, Suite 1700 Houston TX 77002 Street # City State Zip	

Mail 1st Copy to: SCAQMD- Compliance & Enforcement
P.O. Box 4941
Diamond Bar, CA 91765

Mail 2nd Copy to: USEPA, Region IX, Air-3
Director of Air Division
75 Hawthorne Street
San Francisco, CA 94105

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: 1S6073

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, D12.3, D12.9, D12.10, D12.11, 012.12, 012.13, D12.14, D29.5, 029.6, 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, 012.8, 012.9, D12.10, D12.11, D12.12, D12.13, D12.14, D29.5, 029.6, E193.2, E443.4, E443.9, H23.19, and H23.10 of Facility Permit No. 166073}

2012

3002(c)(1) {from Permit Condition Nos. A63.15, A63.16, D12.3, 012.9, D12.10, D12.11, 012.12, D12.13, D12.14, 029.5, D29.6, E193.2, E443.4, E443.9, H23.19, and H23.10 of Facility Permit No. 166073}

EQUIPMENT DESCRIPTION	DEVICE/APPLICATION/PERMIT
Internal Combustion Engines (ICE)	081, D82, 033, D84, D35, and D86
Selective Catalytic Reduction (SCR) Unit	C197, C198, C199, C200, C201, C202, C203, C204, and C205
Gas Turbines	D95, D96, 097, D93, D99, and 0100
Urea Injection System	

CONDITIONS

"Saturn Turbines" – Device Id Nos. D95, D9S 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



South Coast Air Quality Management District

Form 500-N

Title V - Deviations, Emergencies & Breakdowns

*This written report is in addition to requirements to verbally report certain types of incidents. Verbal reports may be made by calling AQMD at 1-800-288-7664 (1-800-CUT-SMOG) or AQMD enforcement personnel.

Mail To:
SCAQMD- Compliance & Enforcement
P.O. Box 4941
Diamond Bar, CA 91765-0941
Tel: (909) 396-3385
www.aqmd.gov

Section I - Operator Information

1. **Facility Name** (Business Name of Operator That Appears On Permit): Beta Offshore OCS Parcels P300/P301

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

3. **Address:** (where incident occurred) 111 W. Ocean Blvd., Suite 1240 Street Address
Long Beach City CA 90802 State Zip

4. **Mailing Address:** (if different from Item 3) 111 W. Ocean Blvd., Suite 1240 Street Address
Long Beach City CA 90802 State Zip

5. Provide the name, title, and phone number of the person to contact for further information:
Candace Taylor Name HSE Specialist Title (510) 502-1515 Phone #

Section II - Reporting of Breakdowns, Deviations, and Emergencies

1. This written notification is to report a(n):

Type of Incident	Verbal Report Due*	Written Report Due
a. <input type="checkbox"/> Emergency under Rule 3002(g)	Within 1 hour of discovery	Within 2 working days from when the emission limit was exceeded.
b. <input type="checkbox"/> Breakdown under: <input type="checkbox"/> Rule 430 (Non-RECLAIM) <input type="checkbox"/> Rule 2004 (RECLAIM) <input type="checkbox"/> Rule 218 (Non-RECLAIM) [See Rule 218(f)(3)]	For Rules 430 & 2004 - Within 1 hour of discovery. For Rule 218 - Within 24 hours or next business day for failure/shutdown exceeding 24 hours	For Rules 430 & 2004 - Within 7 calendar days after breakdown is corrected, but no later than 30 days from start of the breakdown, unless a written extension is granted. For Rule 218 - With required semi-annual reports.
c. <input type="checkbox"/> Deviation with excess emissions [See Title V Permit, Section K, Condition No. 22B]	Within 72 hours of discovery of the deviation or shorter reporting period if required by an applicable State or Federal Regulation.	Within 14 days of discovery of the deviation.
d. <input checked="" type="checkbox"/> Other Deviation [See Title V Permit, Section K, Condition Nos. 22D & 23]	None	With required semi-annual monitoring reports.

2. The incident was first discovered by: NA on _____ on _____ AM PM
Name Date Time

3. The incident was first reported by: NA on _____ on _____ AM PM
a. Via Phone Name of AQMD Staff Person Date Time
b. In Person Notification Number (Required): None

4. When did the incident actually occur? 12/31/2023 12:00 AM PM
Date Time

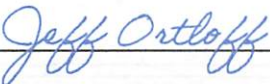
AQMD USE ONLY	Received By:		Assigned By:		Inspector:	
	Date/Time Received:		Date/Time Assigned:		Date/Time Received Assignment:	
	Date Delivered To Team:		Date Reviewed Inspector Report:		Date Inspected Facility:	
	Team:	Sector:	Breakdown/Deviation Notification No.		Date Completed Report:	
	Recommended Action:	Cancel Notification	Grant Relief	Issue NOV No. _____	Other: _____	
	Final Action:	Cancel Notification	Grant Relief	Issue NOV No. _____	Other: _____	

5. Has the incident stopped? a. Yes, on: _____ Date _____ Time _____ AM PM b. No
6. What was the total duration of the incident? _____ Days _____ Hours
7. For equipment with an operating cycle, as defined in Rule 430 (b)(3)(A), when was the end of the operating cycle during which the incident occurred? _____ Date _____ Time _____ AM PM
8. Describe the incident and identify each piece of equipment (by permit, application, or device number) affected. Attach photos (when available) of the affected equipment and attach additional pages as necessary.
 Non-compliance with NOx emission limit for Beta Offshore's ICEs subject to Rule 1110.2, effective 12/31/2023. Devices affected are D81, D82, D83, D84, D85, D86, C197, C198, C199, C200, C201, C202 as listed in Section H of the Permit.
9. The incident may have resulted in a:
 a. Violation of Permit Condition(s): No violations of permit conditions or SCAQMD applicable rules due to granting of
 b. Violation of AQMD Rule(s): Regular Variance on 12/7/2023 per Minute Order Case No. 5855-7 (attached)
10. What was the probable cause of the incident? Attach additional pages as necessary.
Refer to Case No. 5855-7 Petition for Regular Variance submitted to SCAQMD Hearing Board on 10/20/2023.
11. Did the incident result in excess emissions? No Yes (Complete the following and attach calculations.)
 VOC _____ lbs NOx _____ lbs SOx _____ lbs H2S _____ lbs
 CO _____ lbs PM _____ lbs Other: _____ lbs _____ pollutant
12. For RECLAIM facilities Subject to Rule 2004 (i)(3) ONLY: If excess emissions of NOx and/or SOx were reported in Item 11, do you want these emissions to be counted when determining compliance with your annual allocations?
 a. Yes, for: NOx SOx b. No, for: NOx SOx
 If box 12(b) above is checked, include all information specified in Rule 2004(i)(3)(B) and (C), as applicable.
13. Describe the steps taken to correct the problem (i.e., steps taken to mitigate excess emissions, equipment repairs, etc.) and the preventative measures employed to avoid future incidents. Include photos of the failed equipment if available and attach additional pages as necessary.
Beta has been granted a Regular Variance, and is following the requirements and compliance schedule detailed in the Minute Order Case No. 5855-7, and by installing and source testing the SCRs (C197-C202) on the Rig Engines (D81-D86).
14. Was the facility operating properly prior to the incident?
 a. Yes b. No, because: _____
15. Did the incident result from operator error, neglect or improper operation or maintenance procedures?
 a. Yes b. No, because: Non-compliant due to lower emission limits effective 12/31/2023.
16. Has the facility returned to compliance?
 a. No, because: Coverage period for Regular Variance is from 12/31/2023 through 11/16/2024, as granted by HB.
 b. Yes (Attach evidence such as emissions calculations, contemporaneous operating logs or other credible evidence.)

Section III - Certification Statement

I certify under penalty of law that based on information and belief formed after reasonable inquiry, the statements and information in this document and in all attachments and other materials are true, accurate, and complete.

For Title V Facilities ONLY: I also certify under penalty of law that that I am the responsible official for this facility as defined in AQMD Regulation XXX.

1. Signature of Responsible Official: 	2. Title of Responsible Official: Director, Facilities Engineering
3. Print Name: Jeff Ortloff	4. Date: 02/28/2024
5. Phone #: (832) 219-9034	6. Fax #:
7. Address of Responsible Official: 500 Dallas Street, Suite 1700 Houston TX 77002	
Street #	City State Zip



Mail To:
 SCAQMD- Compliance & Enforcement
 P.O. Box 4941
 Diamond Bar, CA 91765-0941

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

Section I - Operator Information

1. **Facility Name** (Business Name of Operator That Appears On Permit): Beta Offshore - OCS Parcels P300/P301 2. **Date:** (mo/day/yr) 02/28/2024 3. **Revision?** 4. **Valid AQMD Facility ID** (Available On Permit Or Invoice Issued By AQMD): 166073

Section II - Non-Compliant Operations Report

1. **Facility applying for initial Title V permit:** This facility has not been issued an initial Title V permit. The table below describes the non-compliant operations and the applicable requirements. The variance case number is also noted.
2. **Facility has been issued an initial Title V permit:**
- a. This facility has experienced non-compliant operations as described below but achieved compliance with the applicable requirements on _____ (mo/day/yr).
- b. This facility continues to experience non-compliant with the applicable requirements as described below. The Case Number for the approved Alternative Operating Conditions (AOC) is noted.

Device or Application Number	Applicable Requirement* (Rule or Permit Condition Number)	Federally Enforceable Requirement?	(Including any Notices of Violation Issued) Describe Non-Compliant Operations (Attach additional sheets as needed.)	Variance or AOC Case Number (Attach copy of document.)
C197 - C202	Attached Minute Order 5855-7	<input checked="" type="radio"/> Yes <input type="radio"/> No	Install Selective Catalytic Redudtion; Source Test ICES / SCRs	SCAQMD 5855-7
		<input type="radio"/> Yes <input type="radio"/> No		
		<input type="radio"/> Yes <input type="radio"/> No		
		<input type="radio"/> Yes <input type="radio"/> No		
		<input type="radio"/> Yes <input type="radio"/> No		

*Only list the applicable requirement with which the operation is not in compliance.

Section III - Part 70 Compliant Schedule/Plan and QIP

Describe How Compliance Was or Will Be Achieved	Compliance Schedule	
	Date (mo/day/yr)	Remedial Measures & Milestones
Starting 1/1/24, submit documents for the following equipment covered by variance including: C197, C198, C199, C200, C201, and C202 (SCRs), for compliance with Rule 1110.2; submit ICE usage logs, excess emissions calculations, and excess emissions fee payments.	Monthly 1/1/2024 to 11/16/2024	- Installation of SCRs to modify Rig Engines (ICES) - Commissioning of modified ICES and SCRs - Source Testing of ICES and SCRs - Per attached Minute Order 5855-7 conditions and schedules

Section IV - Progress Report Schedule

1. **Certified progress reports will be submitted according to the following schedule** (Check a or b and complete c.):

a. Semi-annually b. More frequently as specified c. Submittal dates: 1) Monthly 2) _____ 3) _____ 4) _____ (mo/day/yr)

**Title V
Instructions for
Form 500-C2**

**Application Instructions for
Non-Compliant Operations Report and Compliance Plan and
Quality Improvement Plan (QIP)**

To complete this application, type or print the information in the appropriate blanks.

Complete this form for any equipment not operating in compliance with federally-enforceable, applicable requirements or will not be in compliance when the Title V permit is issued. A separate Form 500-C2 should be completed for each process or system that is not in compliance with all applicable requirements. (For initial or Renewal Title V application submittal, attach all completed Forms 500-C2 to Form 500-C1.)

Section I - Operator Information

Facility ID: Complete only if your facility has been issued an identification or ID number by the AQMD. If not, leave these boxes blank. An ID number will be assigned when the application is submitted.

Revision: Check this box if this submittal is a revision to a previous report.

Section II - Non-Compliant Operations Report

Device or Application Number: For RECLAIM facilities, the device number information can be found in the permit under Section D: Facility Description and Equipment Specific Conditions. Non-RECLAIM facilities shall refer to the existing application number. In the event that there are no numbers assigned to a device because of an addition or modification to a facility, indicate this in the appropriate spaces provided on the form by inserting the word "new." Upon application approval, the AQMD will assign these numbers and, subsequently, they will be added to the permit for future reference.

Applicable Requirement: Cite the rule number and section and the date of the rule version (e.g., Rule 1130 (b)(5), 08/02/91), or the permit condition with which the device currently is not in compliance.

Federally Enforceable Requirement: For each rule, indicate whether the applicable version is federally enforceable.

Describe Non-Compliant Operations: For each device that is identified as not in compliance according to applicable requirements, describe in detail the circumstances and parameters of the non-compliance. Attach additional sheets as needed. If one or more Notices of Violation were issued, enter the Notice numbers and the descriptions of the violations here.

Variance or Alternative Operating Condition Case Number: When applicable, provide the case number and attach a copy of any active variance or alternative operating condition granted by the AQMD Hearing Board for the non-compliant equipment.

Section III - Part 70 Compliance Schedule/Plan and QIP

A compliance plan is required for any device that is expected to not be operating in compliance when the Title V permit is scheduled to be issued. Provide a detailed schedule of compliance including remedial measures (including an enforceable sequence of actions with milestones) leading to compliance. This compliance schedule should resemble, and is at least as stringent as, that contained in any judicial consent decree or administrative order to which your facility is subject.

A Quality Improvement Plan (QIP) may be required where the owner or operator has failed to satisfy the general duty to properly operate and maintain an emissions unit or the owner or operator has evidence of a failure to comply with an applicable requirement. The QIP would include both an initial "problem investigation" phase and a "corrective action" phase.

Describe How Compliance Was or Will Be Achieved: Describe in detail all remedial measures that the facility has taken or will take to bring the equipment into compliance. Attach additional sheets as needed.

Compliance Schedule: List each remedial measure and milestone and the date when the action was or will be completed, in chronological order.

Section IV - Progress Report Schedule

Provide a schedule of due dates for progress reports beginning after the scheduled date that the Title V permit will be issued. The frequency of reporting must be at least every six months. Skip this section if compliance has already been achieved for device(s) listed in Section I.



South Coast Air Quality Management District

Form 500-C2

Title V Non-Compliant Operations Report and Part 70 Compliance Schedule/Plan and Quality Improvement Plan - QIP

Mail To:
 SCAQMD- Compliance & Enforcement
 P.O. Box 4941
 Diamond Bar, CA 91765-0941

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

Section I - Operator Information

1. **Facility Name** (Business Name of Operator That Appears On Permit): Beta Offshore - OCS Parcels P300/P301 2. **Date:** (mo/day/yr) 02/28/2024 3. **Revision?** 4. **Valid AQMD Facility ID** (Available On Permit Or Invoice Issued By AQMD): 166073

Section II - Non-Compliant Operations Report

1. **Facility applying for initial Title V permit:** This facility has not been issued an initial Title V permit. The table below describes the non-compliant operations and the applicable requirements. The variance case number is also noted.
2. **Facility has been issued an initial Title V permit:**
- a. This facility has experienced non-compliant operations as described below but achieved compliance with the applicable requirements on _____ (mo/day/yr).
- b. This facility continues to experience non-compliant with the applicable requirements as described below. The Case Number for the approved Alternative Operating Conditions (AOC) is noted.

Device or Application Number	Applicable Requirement* (Rule or Permit Condition Number)	Federally Enforceable Requirement?	(Including any Notices of Violation Issued) Describe Non-Compliant Operations (Attach additional sheets as needed.)	Variance or AOC Case Number (Attach copy of document.)
D81 - D86	Attached Minute Order 5855-7	<input checked="" type="radio"/> Yes <input type="radio"/> No	Modify ICES to meet lower R1110.2 NOx limits; Source Test ICES	SCAQMD 5855-7
		<input type="radio"/> Yes <input type="radio"/> No		
		<input type="radio"/> Yes <input type="radio"/> No		
		<input type="radio"/> Yes <input type="radio"/> No		
		<input type="radio"/> Yes <input type="radio"/> No		

*Only list the applicable requirement with which the operation is not in compliance.

Section III - Part 70 Compliant Schedule/Plan and QIP

Describe How Compliance Was or Will Be Achieved	Compliance Schedule	
	Date (mo/day/yr)	Remedial Measures & Milestones
Starting 1/1/24, submit documents for the following equipment covered by variance including: D81, D82, D83, D84, D85, D86 (ICES), for compliance with Rule 1110.2 emission limits; submit usage logs, excess emissions calculations, and excess emissions fee payments.	Monthly 1/1/2024 to 11/16/2024	- Installation of SCRs to modify Rig Engines (ICES) - Commissioning of modified ICES and SCRs - Source Testing of ICES and SCRs - Per attached Minute Order 5855-7 conditions and schedules

Section IV - Progress Report Schedule

1. **Certified progress reports will be submitted according to the following schedule** (Check a or b and complete c.):

a. Semi-annually b. More frequently as specified c. Submittal dates: 1) Monthly 2) _____ 3) _____ 4) _____ (mo/day/yr)

**Title V
Instructions for
Form 500-C2**

**Application Instructions for
Non-Compliant Operations Report and Compliance Plan and
Quality Improvement Plan (QIP)**

To complete this application, type or print the information in the appropriate blanks.

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Section I - Operator Information

Facility ID: Complete only if your facility has been issued an identification or ID number by the AQMD. If not, leave these boxes blank. An ID number will be assigned when the application is submitted.

Revision: Check this box if this submittal is a revision to a previous report.

Section II - Non-Compliant Operations Report

Device or Application Number: For RECLAIM facilities, the device number information can be found in the permit under Section D: Facility Description and Equipment Specific Conditions. Non-RECLAIM facilities shall refer to the existing application number. In the event that there are no numbers assigned to a device because of an addition or modification to a facility, indicate this in the appropriate spaces provided on the form by inserting the word "new." Upon application approval, the AQMD will assign these numbers and, subsequently, they will be added to the permit for future reference.

Applicable Requirement: Cite the rule number and section and the date of the rule version (e.g., Rule 1130 (b)(5), 08/02/91), or the permit condition with which the device currently is not in compliance.

Federally Enforceable Requirement: For each rule, indicate whether the applicable version is federally enforceable.

Describe Non-Compliant Operations: For each device that is identified as not in compliance according to applicable requirements, describe in detail the circumstances and parameters of the non-compliance. Attach additional sheets as needed. If one or more Notices of Violation were issued, enter the Notice numbers and the descriptions of the violations here.

Variance or Alternative Operating Condition Case Number: When applicable, provide the case number and attach a copy of any active variance or alternative operating condition granted by the AQMD Hearing Board for the non-compliant equipment.

Section III - Part 70 Compliance Schedule/Plan and QIP

A compliance plan is required for any device that is expected to not be operating in compliance when the Title V permit is scheduled to be issued. Provide a detailed schedule of compliance including remedial measures (including an enforceable sequence of actions with milestones) leading to compliance. This compliance schedule should resemble, and is at least as stringent as, that contained in any judicial consent decree or administrative order to which your facility is subject.

A Quality Improvement Plan (QIP) may be required where the owner or operator has failed to satisfy the general duty to properly operate and maintain an emissions unit or the owner or operator has evidence of a failure to comply with an applicable requirement. The QIP would include both an initial "problem investigation" phase and a "corrective action" phase.

Describe How Compliance Was or Will Be Achieved: Describe in detail all remedial measures that the facility has taken or will take to bring the equipment into compliance. Attach additional sheets as needed.

Compliance Schedule: List each remedial measure and milestone and the date when the action was or will be completed, in chronological order.

Section IV - Progress Report Schedule

Provide a schedule of due dates for progress reports beginning after the scheduled date that the Title V permit will be issued. The frequency of reporting must be at least every six months. Skip this section if compliance has already been achieved for device(s) listed in Section I.



Section III - Semi-Annual Monitoring Report

1. Was all monitoring as required by the permit conducted?

- a. Yes
- b. No

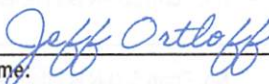
If No, Please Explain:

D81 and D82 engines non-compliant with VOC limits from July 2023 source test. Deviation reported, calculated and paid excess emissions; re-tested in November 2023 with passing VOC results.

Amended Rule 1110.2 included lower NOx emission limits for applicable engines that would become effective on 12/31/2023; until then Beta Offshore was in compliance with Rule 1110.2. The lower emission limits for Rule 1110.2 were not going to be met by 12/31/2023, as explained in Beta Offshore's petition for a Regular Variance submitted in October 2023. The Regular Variance was granted on 12/7/2023, and the attached Minute Order Case No. 5855-7 details the equipment, the applicable rules, and applicable permit conditions covered by the variance. The coverage period for the variance is 12/31/2023 through 11/16/2024, therefore the only day where the lower emission limits of Rule 1110.2 were not met was 12/31/2023. A completed and signed Form 500-N is also attached acknowledging the "Other Deviation" for this one day (12/31/2023) of non-compliance during the monitoring compliance period for this Form 500-SAM.

Section IV - Responsible Official Signature Statement

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 statements 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: Director, Facilities Engineering
3. Print Name: Jeff Ortloff	4. Date: 02/28/2024
5. Phone #: (832) 219-9034	6. Fax #:
7. Address of Responsible Official: 500 Dallas Street, Suite 1700 Houston TX 77002 Street # City State Zip	

Mail Original to: SCAQMD- Compliance & Enforcement
P.O. Box 4941
Diamond Bar, CA 91765



Form 500-SAM

Title V - Semi-Annual Monitoring Report

Section I - Operator Information

1. Facility Name (Business Name of Operator That Appears On Permit): Beta Offshore OCS Parcels P300/P301

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

3. This report is based on the applicable rules, permit terms and requirements as specified in Sections A through K and Appendices A and B inclusive, and any compliance plans, variances, and alternative operating conditions in effect during the permit term of the Title V Facility Permit to Operate issued on: 02/19/2021
(mo/day/year)

4. This report is due: 02/28/2024 and covers the period from: 07/01/2023 to: 12/31/2023
(mo/day/year) (mo/day/year) (mo/day/year)

5. This report supersedes a semi-annual monitoring report previously submitted on: 08/31/2023
(mo/day/year)

Section II - Reference Summary of Deviations, Emergencies & Breakdowns Reported

1. Indicate the status of Deviations, Emergencies & Breakdowns during this reporting period*:
- a. This facility has not experienced any deviations, emergencies or breakdowns.
 - b. This facility has experienced one or more deviations, emergencies or breakdowns as indicated in the table below*:

Type of Incident Indicate Deviation (D), Breakdown (B), or Emergency (E)			Notification Number	Was Form 500-N previously submitted for the non-compliance? (Attach additional sheets as necessary)	
<input checked="" type="radio"/> D	<input type="radio"/> B	<input type="radio"/> E	76381	<input checked="" type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-N is attached to this report
<input checked="" type="radio"/> D	<input type="radio"/> B	<input type="radio"/> E	None	<input type="radio"/> Yes, on: _____ (mo/day/year)	<input checked="" type="radio"/> No, Form 500-N is attached to this report
<input type="radio"/> D	<input type="radio"/> B	<input type="radio"/> E		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-N is attached to this report
<input type="radio"/> D	<input type="radio"/> B	<input type="radio"/> E		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-N is attached to this report
<input type="radio"/> D	<input type="radio"/> B	<input type="radio"/> E		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-N is attached to this report
<input type="radio"/> D	<input type="radio"/> B	<input type="radio"/> E		<input type="radio"/> Yes, on: _____ (mo/day/year)	<input type="radio"/> No, Form 500-N is attached to this report

* For each deviation, emergency or breakdown that occurs, in most cases, your facility should have already verbally reported the incident. A notification number is assigned when the incident is verbally reported or Form 500-N is submitted. You will need this number to avoid submitting a duplicate Form 500-N with this report