



air pollution control district  
SANTA BARBARA COUNTY

August 4, 2020

Mr. Keith Wenal  
Beacon West Energy Group  
1145 Eugenia Place, Suite 101  
Carpinteria, CA 93013

FID: 00028, 03035, 03105  
Permit: P7R 07904 R12,  
P7R 08103-R11,  
P7R 08234-R11  
SSID: 01063

Re: Part 70 Permit Renewal Applications  
Pt-70 PTO 7904-R12, Pt-70 PTO 8103-R11, Pt-70 PTO 8234-R11

Dear Mr. Wenal:

On August 4, 2020, the Santa Barbara County Air Pollution Control District (District) determined that your applications for Part 70 Permit Renewal / Reevaluation (PT-70/Reeval) No. 07904 R12, 08103-R11 and 08234-R11 for Ellwood Onshore Facility, Beachfront Lease, and Platform Holly were complete. The District will make a decision to either issue or deny a permit for the application within 180 days from the completeness date or 180 days after lead agency approval of the project, whichever time period is longer.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 961-8888.

Sincerely,

William Sarraf, Division Supervisor  
Engineering Division

cc: Ellwood Onshore Facility 00028 Project File  
Engr Chron File

\\sbcapcd.org\shares\Groups\ENGR\WP\Oil&Gas\Major Sources\SSID 01063 Venoco - Ellwood\00028 Ellwood Onshore Facility\Reevals\PTO 7904- R12\PT-70-Reeval 07904 R12 - ATC Completeness - 8-4-2020



June 15, 2020

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

Re: Ellwood Stationary Source 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 subject permits within the stationary source. The facilities included in this submittal are the Ellwood Onshore Facility, Platform Holly and Beachfront Lease.

The following forms are enclosed:

1. Form APCD-01. Note that although this form covers multiple facilities, the "Owner" section lists "Venoco Liquidating Trust", as this entity is the owner of the Ellwood Onshore Facility (EOF). Please note that CSLC is the owner of Platform Holly and Beachfront Lease facilities.
2. Part 70 forms 1302-A1, A2, B, I1, I2 and M.
3. De Minimus Tracking Logs for each facility.

CSLC and Beacon West are not currently requesting any specific changes to the existing Part 70 permits for this source. As you are aware, these facilities are currently in decommissioning mode and we expect that the upcoming renewals will ultimately reflect changes to equipment and processes due to decommissioning. If acceptable to the District, we propose to insert these changes during the draft re-evaluation comments phase.

Please debit Beacon West any applicable fees, and feel free to contact me at (805) 395-9676 or [john.garnett@beacon-west.com](mailto: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 the printed name.

John Garnett  
EHSR Advisor  
Enclosures Noted



air pollution control district  
SANTA BARBARA COUNTY

## 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)
 ☐ Transfer of Owner/Operator (use Form -01T)  
☒ Permit to Operate (PTO)
 ☐ Emission Reduction Credits  
☐ ATC Modification
 ☐ Increase in Production Rate or Throughput  
☐ PTO Modification
 ☐ Decrease in Production Rate or Throughput  
☒ Other (Specify) Stationary Source triennial re-eval

Previous ATC/PTO Number (if known) 7904-R1, 8234-R10, 8103-R10

☒ 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	00028	Permit No.	PT-70/Reeval 07904-R12	Rec'vd 6/15/2020
Project Name	Ellwood Onshore Facility			
Filing Fee	\$420 Billed		202.E? YES / NO	

Beacon West

**5. COMPANY/CONTACT INFORMATION:**

<b>Owner Info</b>		<input type="radio"/> Yes <input checked="" type="radio"/> No	Use as Billing Contact?
Company Name	Venoco Liquidating Trust c/o Mannion Consulting, LLC (EOF only)		
Doing Business As			
Contact Name		Position/Title	
Mailing Address	PO Box 1564		
City	West Chester	State	OH Zip Code 45071-1564
Telephone	(614) 560-6071	Cell	Email

<b>Operator Info</b>		<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

<b>Authorized Agent Info*</b>		<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.

<b>SEND PERMITTING CORRESPONDENCE TO</b> (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	7979 Hollister Ave. (EOF)		
City	Goleta	State	CA Zip Code 93117
Work Site Phone	+1 (805) 961-2339		

☒ 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-evaluations for Ellwood Onshore Facility, Platform Holly and Beachfront Lease

## 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

N/A

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.



Signature of application preparer

Jun 15, 2020

Date

John Garnett

Print name of application preparer

Beacon West Energy Group, LLC

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.

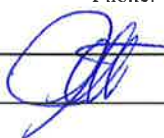
Completed By:

Title:

Date:

Phone:

Signature of Authorized Company Representative



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

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# STATIONARY SOURCE SUMMARY

## (Form 1302-A1)

**APCD: Santa Barbara County Air Pollution Control District**

**COMPANY NAME: California State Lands Commission/Beacon West Energy Group, LLC**

### ➤ 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
2. Four digit SIC Code: 1311 USEPA AIRS Plant ID (for APCD use only):
3. Parent Company (if different than Source Name): Venoco LLC (for Ellwood Onshore Facility only)
4. Mailing Address of Responsible Official: 6267 Carpinteria Ave., Ste. 200, Carpinteria, CA 93013
5. Street Address of Source Location (include Zip Code): Ellwood Oil & Gas Processing Facility, 7979 Hollister Ave., Goleta, CA 93117
6. UTM Coordinates (if required) (see instructions):
7. Source located within: 50 miles of the state line ☒ Yes ☐ No  
 50 miles of a Native American Nation ☐ Yes ☐ No ☒ Not Applicable
8. Type of Organization: ☒ Corporation ☐ Sole Ownership ☒ Government ☐ Partnership ☐ Utility Company
9. Legal Owner's Name: Venoco LLC (for Ellwood Onshore Facility only)
10. Owner's Agent Name (if any): Title: Telephone #:
11. Responsible Official: Larry Huskins Title: Operations Manager Telephone #: (805) 745-2100
12. Plant Site Manager/Contact: Bert Van Schoyck Title: Operations Supervisor Telephone #: (805) 961-2301
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)

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

### 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 7904-R10, PTO 8234-R9, PTO 8103-R8	December 2020
<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)

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

## I. TOTAL STATIONARY SOURCE EMISSIONS

Provide a brief description of operating scenario : The Ellwood Onshore Facility consists of the following primary emission systems and processes: Crude oil receiving system; Crude oil processing system; Crude oil and other HC liquid storage & transfer system; Gas receiving system; Gas processing/delivery system, sulfur removal, including dehydration, sweetening and CO<sub>2</sub> removal; Gas compression/Low temperature system, including LPG/NGL recovery; Loading rack for LPG and NGL and other HC liquid trucks; Vapor/Waste gas collection and incineration system; Produced and waste water system; Pipeline and Equipment components with fugitive emissions; and, Support system including process heater.

POLLUTANT* (name)	POTENTIAL TO EMIT EMISSIONS (tons per year)	PRE-MODIFICATION EMISSIONS (tons per year)	EMISSIONS CHANGE (tons per year)
NOx	207.8		
ROC	36.36		
CO	97.79		
PM	20.40		
PM-10	19.90		
SOx	29.47		
	Note: combined Federal PTE		

\* 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)

<b>APCD:</b> Santa Barbara County Air Pollution Control District	<b>➤ APCD USE ONLY ◀</b> <b>APCD IDS Processing ID:</b>
<b>COMPANY NAME:</b> California State Lands Commission/Beacon West Energy Group, LLC	<b>SOURCE NAME:</b> 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 <sup>1</sup>		Affected Emission Unit	In compliance? (yes/no/ exempt <sup>3</sup> )	Effective Date <sup>4</sup>
Regulatory Reference <sup>2</sup>	Regulation Title <sup>2</sup>			
40 CFR Parts 51 & 52	Nonattainment Area Review and Prevention of Significant Deterioration	Entire Facility	Yes	in effect
40 CFR Part 60, Subpart LLL	NSPS for Onshore Gas Plant; SO <sub>2</sub> Emissions	EOF Lo-Cat Unit	Yes	in effect
40 CFR Part 60, Subpart KKK	NSPS for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	Fugitive emission components	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 HH	NESHAP for Oil and Natural Gas Production and Natural Gas Transmission and Storage	EOF, Holly & Beachfront (recordkeeping only)	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#s107447, 107455 through 107459, 100222, 8166)	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-II (CONT'D)

- <sup>1</sup> Review APCD SIP Rules, NSPS, NESHAPS, and MACTs .
- <sup>2</sup> 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)
- <sup>3</sup> If exempt from applicable federal requirement, include explanation for exemption.
- <sup>4</sup> Indicate the date during the permit term that the applicable federal requirement will become effective for the emission unit.
- <sup>5</sup> 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-II" appear on each page. \*\*\*

**II. APPLICABLE FEDERAL REQUIREMENTS**

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

<b>Applicable Federal Requirement</b>				
<b>Regulatory Reference</b>	<b>Regulation Title</b>	<b>Affected Emission Unit</b>	<b>In Compliance?</b>	<b>Effective Date</b>
<b>Generic Federally-Enforceable APCD Rules</b>				
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 318	Vacuum Producing Devices – Southern Zone	All systems working under vacuum	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, ELLWOOD STATIONARY SOURCE, FORM 1302-II (CONT'D)

<b>Applicable Federal Requirement</b>				
<b>Regulatory Reference</b>	<b>Regulation Title</b>	<b>Affected Emission Unit</b>	<b>In Compliance?</b>	<b>Effective Date</b>
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
<b>Unit-Specific Federally-Enforceable APCD Rules</b>				
Rule 316	Storage and Transfer of Gasoline	EOF Gasoline supply pump	Yes	in effect
Rule 325	Crude Oil Production and Separation	Storage tanks; Emission units capable of venting gases; Seep gas equipment at and downstream of the inlet to the seep gas pipeline.	Yes	in effect
Rule 330	Surface Coating of Metal Parts & Products	All surface coating used for any metal coating operations.	Yes	in effect
Rule 331	Fugitive Emissions I&M	All components (valves, flanges, etc.) used to handle oil and gas.	Yes	in effect
Rule 333	Control of Emissions from Reciprocating IC Engines	Holly Crane ICE, ID# 002336; Holly Generator Engines ID#s 001930, 001931, 001932	Yes	in effect
Rule 342	Control of NOx from Boilers, Steam Generators, etc.	EOF Process Heaters ID#s 285, 290, 291, 292 (H-201, 202, 203, 204)	Yes	in effect
Rule 343	Petroleum Storage Tank Degassing	Oil storage tanks, ID#s 283, 284, 6477 (T-202, 203, 204)	Yes	in effect
Rule 344	Petroleum Sumps, Pits & Well Cellars	Beachfront well cellars ID#100195	Yes	in effect
Rule 359	Flares and Thermal Oxidizers	EOF TOs ID#s 286, 287, 288 (H-205, 206, 207); Holly Flares ID#s 7982, 9603.	Yes	in effect
Rule 361	Small Boilers, Steam Generators and Process Heaters	EOF Heaters: ID #s 289, 290, 291 (H-201, 202, 203)	Yes	in effect

## COMPLIANCE PLAN (Form 1302-I2)

<b>APCD:</b> Santa Barbara County Air Pollution Control District	<b>➤ APCD USE ONLY ◀</b> <b>APCD IDS Processing ID:</b>
<b>COMPANY NAME:</b> California State Lands Commission/Beacon West Energy Group, LLC	<b>SOURCE NAME:</b> 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 basis<sup>1</sup>;**
- ☐ **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.<sup>2</sup>**

<div style="border: 1px solid black; padding: 2px; display: inline-block;"> <small>DocuSigned by:</small>    <small>A8DS38BAE92D437</small> </div>	6/11/2020
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)

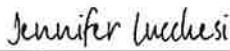
<b>APCD:</b> Santa Barbara County Air Pollution Control District	<b>➤ APCD USE ONLY ◀</b> <b>APCD IDS PROCESSING ID:</b>
<b>COMPANY NAME:</b> California State Lands Commission/Beacon West Energy Group, LLC	<b>SOURCE NAME:</b> Ellwood Stationary Source

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.

<p><b>Forms included with application</b></p> <p> <input checked="" type="checkbox"/> Stationary Source Summary Form  <input checked="" type="checkbox"/> Total Stationary Source Emission For            Compliance Plan Form  <input type="checkbox"/> Compliance Plan Certification Form  <input type="checkbox"/> Exempt Equipment Form  <input type="checkbox"/> Certification Statement Form       </p> <p style="text-align: center;"><b>List other forms or attachments</b></p> <p>         _____          _____          _____          _____       </p> <p>[ ] check here if additional forms listed on back</p>	<p><b>Attachments included with application</b></p> <p> <input type="checkbox"/> Description of Operating Scenarios  <input type="checkbox"/> Sample emission factors  <input type="checkbox"/> Fugitive emission estimates  <input checked="" type="checkbox"/> List of Applicable requirements  <input type="checkbox"/> Discussion of units out of compliance with applicable federal requirements and, if required, submit a schedule of Compliance  <input type="checkbox"/> Facility schematic showing emission points  <input type="checkbox"/> NSR Permit  <input type="checkbox"/> PSD Permit  <input type="checkbox"/> Compliance Assurance monitoring protocols  <input type="checkbox"/> Risk management verification per 112(r)       </p>
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**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:  
  
 A8DE3BBAE92D437

6/11/2020

**Signature of Responsible Official:**

**Date:**

**Print Name of Responsible Official:** Jennifer Lucchesi

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



## SBAPCD RULE 202 - De Minimus Tracking Log

**Facility:** Ellwood Onshore Facility

**Facility Type:** Gas Processing Plant

Project Date:	Originator:	Project:	Controlled ROC Emission (lbs/Day):
			0.00
1/1/1998	Mobil	H-204 Modifications	0.12
1/1/1998	I & M Inspector	Miscellaneous additions in 1st quarter - 1998	0.12
4/1/1998	I & M Inspector	Miscellaneous additions in 2nd quarter - 1998	0.32
7/1/1998	I & M Inspector	Miscellaneous additions in 3rd quarter - 1998	0.20
7/1/1998	I & M Inspector	H-205 Modifications to burner	0.00
10/1/1998	I & M Inspector	Miscellaneous additions in 4th quarter - 1998	0.22
1/1/1999	I & M Inspector	Miscellaneous additions in 1st quarter - 1999	0.20
4/1/1999	I & M Inspector	Miscellaneous additions in 2nd quarter - 1999	0.17
5/19/1999	Bob Van Nostrand	Provide fuel gas to 4" utility line for Holly flare	0.13
7/1/1999	I & M Inspector	Miscellaneous additions in 3rd quarter - 1999	0.14
9/10/1999	Tony Martinez	MOC: EOSF-99-0010 - Install chem. Inj. Quill, H	0.09
10/1/1999	I & M Inspector	Miscellaneous additions in 4th quarter - 1999	0.59
10/23/1999	Dennis Harper	MOC: EOSF-99-0013 - Install PT's on oil & gas p	0.25
1/1/2000	I & M Inspector	Miscellaneous additions in 1st quarter - 2000	0.93
4/1/2000	I & M Inspector	Miscellaneous additions in 2nd quarter - 2000	0.47
5/25/2000	Bob Van Nostrand	MOC: EOSF-00-0015 - Installation of shut-in val	0.09
6/8/2000	Tony Martinez	EOSF-00-0016 - Installation of corrosion coupons	0.11
7/1/2000	I & M Inspector	Miscellaneous additions in 3rd quarter - 2000	0.11
8/25/2000	Tony Martinez	EOSF-00-0019 - K-205 chemical injection points	0.01
10/1/2000	I & M Inspector	Miscellaneous additions in 4th quarter - 2000	0.01
11/10/2000	Tony Martinez	EOSF-00-0023 - K-205 2nd stg. Disch. Corrosion	0.10
2/19/2001	Bob Van Nostrand	EOSF-01-0028 - Install 8" isolation vlv. Inlet S-2	0.09
2/19/2001	George Economus	EOSF-01-0030 - New pump & mech. Seal for S-2	0.19
5/24/2001	Bob Van Nostrand	MOC: EOSF-01-0039 - S-205 de-commission	0.10
5/31/2001	Bob Van Nostrand	EOSF-01-0041 - Isolation valves for PVS's on tk	0.19
5/31/2001	Bob Van Nostrand	EOSF-01-0056 - Level switch spacer, V-235	0.09
6/14/2001	Bob Van Nostrand	EOSF-01-0044 - PSV-230/235/240 isolation valve	0.28
11/14/2001	Bob Van Nostrand	MOC: EOSF-01-0057 - Replace V-220A/C	0.26
4/16/2002	Bob Van Nostrand	MOC: EOSF-02-0065 - Removal of V-220 from s	0.09

cc: Laura Kranzler - Venoco, Inc.



## SBAPCD RULE 202 - De Minimus Tracking Log

**Facility:** Ellwood Onshore Facility

**Facility Type:** Gas Processing Plant

<b>Project Date:</b>	<b>Originator:</b>	<b>Project:</b>	<b>Controlled ROC Emission (lbs/Day):</b>
12/2/2002	Bob Van Nostrand	MOC: EOSF-02-81, Relocate V-119 LCV	0.17
12/2/2002	Bob Van Nostrand	MOC: EOSF-02-79, Install PSV so. end E-207	0.26
12/2/2002	Bob Van Nostrand	MOC: EOSF-02-85, Install PSV on E-225	0.26
12/2/2002	Bob Van Nostrand	MOC: EOSF-02-83, Install PSV on NGL load line	0.26
12/2/2002	Bob Van Nostrand	MOC: EOSF-02-82, Install PSV on V-234	0.00
1/1/2003	Bob Van Nostrand	MOC: EOSF-02-88, Ck. vlv. In gas line to pig rec'	0.01
1/30/2003	Jeff MacDonald	MOC: EOSF-03-92, 2" ck vlv on emulsion inlet	0.00
1/31/2003	Jeff MacDonald	MOC: EOSF-03-89, installation of GC analyzer	0.20
8/22/2007	Walt McCarty	MOC: EOSF-07-122; bottom of F-2201 to Stainle	0.03
11/28/2007	Walt McCarty	EOSF-07-123 - Oil header,E-102 to HT-201,201	0.18
5/1/2008	Joel Toreja	<b>**remove***</b> MOC: EOSF-08-125 - VRU Mitiga	0.00
9/2/2009	Chris Fox	EOSF-09-127 - Vlv. Install on T-202/203 for P-20	0.46
9/2/2009	Chris Fox	EOSF-09-128 - Installation of new P-203	0.69
12/8/2009	Bob Van Nostrand	MOC: EOSF-09-131, Hot tap H-206 flare line	0.09
6/14/2010	Bob Van Nostrand	MOC: EOSF-10-0134 - Hot tap of oil pipeline	0.03
3/28/2011	Bob Van Nostrand	<b>**remove**</b> stabilizer overhead temporary line	0.00
3/28/2011	Bob Van Nostrand	H-205 burner replacement	0.00
5/10/2011	Bob Van Nostrand	Stabilizer Overhead Line	0.29
7/14/2011	Bob Van Nostrand	H-205 Modifications	0.24
4/25/2012	Bob VanNostrand	MOC EOSF-12-0145 - install suction line strainer	0.07
9/24/2014	Bob Van Nostrand	MOC EOSF 14-152 K-205 K-206 2nd stage line	0.24
10/1/2014	Bob Van Nostrand	EOSF 14-153 Replace Oil Rundown Line	0.10
7/18/2018	Bob Van Nostrand	H-207 flow meter	0.11
<b>Aggregate Total Controlled ROC Emissions (lbs/day) as of 1/10/2020:</b>			<b>9.36</b>



## SBAPCD RULE 202 - De Minimus Tracking Log

**Facility:** Platform Holly

**Facility Type:** Offshore Platform

<b>Project Date:</b>	<b>Originator:</b>	<b>Project:</b>	<b>Controlled ROC Emission (lbs/Day):</b>
			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-13	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 val	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 tes	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

cc: Laura Kranzler - Venoco, Inc.



## SBAPCD RULE 202 - De Minimus Tracking Log

**Facility:** Platform Holly

**Facility Type:** Offshore Platform

<b>Project Date:</b>	<b>Originator:</b>	<b>Project:</b>	<b>Controlled ROC Emission (lbs/Day):</b>
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
<b>Aggregate Total Controlled ROC Emissions (lbs/day) as of 1/15/2020:</b>			<b>10.88</b>



## SBAPCD RULE 202 - De Minimus Tracking Log

**Facility:** Beachfront Lease 421

**Facility Type:** Production Field

Project Date:	Originator:	Project:	Controlled ROC Emission (lbs/Day):
			0.00
Aggregate Total Controlled ROC Emissions (lbs/day) as of 6/27/2017:			0.00

cc: Laura Kranzler - Venoco, Inc.