



290 Maple Court
Suite 290
Ventura, CA 93003
(805) 535-2000

February 13, 2009

Mr. Keith Duval
Ventura County Air
Air Pollution Control District
669 County Square Drive, Second Floor
Ventura, CA 93003

Subject: Annual Title V Compliance Certification Report
Platform Gilda, PTO 1492

Dear Mr. Duval:

DCOR, LLC, submits the enclosed Annual Compliance Verification report for Platform Gilda as required by Part 70 Permit to Operate 01492. This report covers the time period of January 1, 2008 to December 31, 2008.

Please do not hesitate to contact me at 805-535-2074 with any questions.

Sincerely,

Christine White

Christine White
Environmental Advisor

Enclosure

CC: Mr. Gerardo Rios
USEPA REGION 9
75 Hawthorne Street
Mail Code: AIR-3
San Francisco, CA 94105

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VENTURA COUNTY
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A.P.C.D.



DCOR, LLC

**2008 ANNUAL COMPLIANCE
CERTIFICATION REPORT**

PLATFORM GILDA

**PART 70
PERMIT TO OPERATE 1492**

1

COMPLIANCE CERTIFICATION FORM

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**SPECIFIC APPLICABLE
REQUIREMENTS**

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**GENERAL APPLICABLE
REQUIREMENTS**

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**GENERAL REQUIREMENTS
FOR SHORT TERM ACTIVITIES**

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

Cover Sheet

Form TVPF45/07-21-03 Page 2 of 2

A copy of each compliance certification shall be submitted to EPA Region IX at the following address:


Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Confidentiality

All information in a Part 70 permit compliance certification is public information. The Part 70 permit is also public information.

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this compliance certification are true, accurate, and complete.

Signature and Title of Responsible Official: Michael Finch  Title: Vice President, ES&RC	Date: 2/13/09
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Time Period Covered by Compliance Certification:

01 / 01 / 08 (MM/DD/YY) to 12 / 31 / 08 (MM/DD/YY)

PTO 1492: Platform Gilda

Reporting Period: January 1, 2008 through December 31, 2008

There were no deviations.

There was one breakdown on 8/30/08 for VRU outage due to SCE power outage. All platform production and processing was shut down; there were no excess emissions.

There were zero excess emissions as shown in the following table:

Excess Emissions

NO _x (lbs)	ROC (lbs)	CO (lbs)	SO _x (lbs)	PM (lbs)	PM10 (lbs)
0	0	0	0	0	0

1.c. PERIODIC MONITORING SUMMARY

This periodic monitoring summary is intended to aid the permittee in quickly identifying key monitoring, recordkeeping, and reporting requirements. It is not intended to be used as a "stand alone" monitoring guidance document that completely satisfies the requirements specifically applicable to this facility. The following tables are included in the periodic monitoring summary:

- Table 1.c.1. - Specific Applicable Requirements
- Table 1.c.2. - Permit-Specific Conditions
- Table 1.c.3. - General Applicable Requirements
- Table 1.c.4. - General Requirements for Short-Term Activities

1.c.1. Specific Applicable Requirements

The Specific Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 7 of this

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Repoi
71.1N1	Rules 71.1.B.1.a, 74.10	<ul style="list-style-type: none"> • Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable • Verbal notice of maintenance activities • Rule 74.10 inspections • Annual compliance certification including verification that tanks are equipped with a vapor recovery system 	<ul style="list-style-type: none"> • Records of quarterly inspections and tank maintenance activities • Rule 74.10 records 	None
71.1N6	Rules 71.1.B.3, 71.1.D.1.c, 74.10	<ul style="list-style-type: none"> • Annual compliance certification including verification of the integrity of the roof and pressure-vacuum relief valve • Rule 74.10 inspections 	<ul style="list-style-type: none"> • Records of number of days the tank has stored or held crude oil during the maintenance operation, location of the tank relative to a tank battery, and whether tank was connected to vapor recovery • Records to show integrity of roof and PV valves for tanks not permanently located at facility • Rule 74.10 records 	None

Check if gives with new permit issued

1.c.1. Specific Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.4.N1	Rules 71.4.B.2 and 74.10	<ul style="list-style-type: none"> Verbal notice of maintenance operations Rule 74.10 inspections Annual compliance certification including verifying the integrity of the cover 	<ul style="list-style-type: none"> Records of maintenance Rule 74.10 records 	None	None	
71.5.N1	Rules 71.5.B.1.a.1, 71.5.B.2, 71.5.B.3, 71.71.1, and 74.10	<ul style="list-style-type: none"> Rule 74.10 inspections Annual compliance certification including visual inspection to ensure system is closed and leak free Annual compliance certification Hours of operation 	<ul style="list-style-type: none"> Records of visual inspections Records of current glycol dehydrator information Rule 74.10 records 	None	Gas Leak - EPA Method 21, Appendix A	
74.9.N7	Rule 74.9.D.3	<ul style="list-style-type: none"> Annual compliance certification Hours of operation 	<ul style="list-style-type: none"> Records of operating hours Date, time, duration, and reason for emergency operation Records of engine data 	None	None	
74.9.N9	Rule 74.9.D.9	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance to ensure diesel-fired engine is used to power cranes and welding equipment only 	<ul style="list-style-type: none"> Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location 	None	None	
74.15.1.N1	Rule 74.15.1.B.1	<ul style="list-style-type: none"> Annual compliance certification Biennial Source Test (NO_x, CO) Routine surveillance to ensure emission unit is functioning w/in its normal operating parameters 	<ul style="list-style-type: none"> Records of source tests Daily records of alternate fuel consumption 	None	<ul style="list-style-type: none"> NO_x-ARB Method 100 CO-ARB Method 100 	

1.c.2. Permit-Specific Conditions

The Permit-Specific Conditions Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 8 of this permit.

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1492PC1 - Condition No. 1	Rule 29 General Recordkeeping	<ul style="list-style-type: none"> Annual compliance certification Monthly records of throughput and consumption 	<ul style="list-style-type: none"> Monthly records 	None	None	
PO1492PC1 - Condition No. 2	Rule 29 Maximum Number of Oil Wells	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO1492PC1 - Condition No. 3	Rule 26 Well Operations - BACT Requirements	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO1492PC1 - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	<ul style="list-style-type: none"> Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery 	Fuel records	None	None	
PO1492PC1 - Condition No. 5	Rules 26 and 29 Crew Boat and Work Boat Emission Limits	<ul style="list-style-type: none"> Annual compliance certification Diesel fuel consumption for boats servicing Platforms Gima and Gilda Monthly calculations of emissions (boats) Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of diesel fuel consumption Monthly calculations of emissions (boats) 	None	None	
PO1492PC1 - Condition No. 6	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> Annual compliance certification Maintain a log book of hours and days of crew boat operation Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of crew boat operation 	None	None	
PO1492PC1 - Condition No. 7	Rule 29 Two Work Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation 	None	None	
PO1492PC1 - Condition No. 8	Rule 29 Solvent Recordkeeping	<ul style="list-style-type: none"> Monthly records of solvent purchase and usage Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of solvent purchase and usage 	None	None	
PO1492PC2 - Condition Nos. 1 and 4	Rule 29 Flare Fuel Consumption	<ul style="list-style-type: none"> Fuel consumption Identify emergency vs. non-emergency usage Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of fuel consumption 	None	None	
PO1492PC2 - Condition Nos. 2 and 3	Rules 71.1 Flare Ignition System Operation	<ul style="list-style-type: none"> Monthly tests of flare's ignition system Annual compliance certification 	<ul style="list-style-type: none"> Records of ignition system Maintenance records 	None	None	

1.c.2. Permit-Specific Conditions (continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1492PC3 - Condition No. 1	Rules 26 and 74.9 200 hours per year backup utility generator operation	<ul style="list-style-type: none"> •Annual compliance certification •Monthly records of backup utility generator hours of operation 	<ul style="list-style-type: none"> •Hours of operation log (non-resettable meter) differentiating non-emergency use and emergency use •Monthly and twelve month rolling records of hours of operation •Monthly fuel consumption 	None	None	
PO1492PC3 - Condition No. 2	Rule 74.9 200 hours per year / emergency use exemptions	<ul style="list-style-type: none"> •Annual compliance certification •Recordkeeping 	<ul style="list-style-type: none"> •Hours of operation log (non-resettable meter) •Monthly and twelve month rolling records of hours of operation 	None	None	

1.c.3. General Applicable Requirements

The General Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 9 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	<ul style="list-style-type: none"> Routine surveillance Visual inspections Annual compliance certification, including a formal survey Opacity readings upon request Notification required for uncorrectable visible emissions Annual compliance certification 	<ul style="list-style-type: none"> All occurrences of visible emissions for periods > 3min in any one hour Annual formal survey of all emissions units 	None	<ul style="list-style-type: none"> Opacity - EPA Method 9 	
52	Rule 52	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	<ul style="list-style-type: none"> Not required based on District EPA emission factor analysis
54.B.1 (OCS)	Rule 54.B.1	<ul style="list-style-type: none"> Annual compliance certification Identify planned vs. unplanned flaring event Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event Upon request, source test for sulfur compounds at point of discharge 	<ul style="list-style-type: none"> Representative fuel analysis or exhaust analysis and compliance demonstration Flare records 	None	<ul style="list-style-type: none"> Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate 	
54.B.2 (OCS)	Rule 54.B.2	<ul style="list-style-type: none"> Annual compliance certification Identify planned vs. unplanned flaring event Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event Determine ground or sea level concentrations of SO₂ upon request Annual compliance certification 	<ul style="list-style-type: none"> Representative fuel analysis or exhaust analysis and modeling data or other compliance demonstration Flare records 	None	<ul style="list-style-type: none"> SO₂ - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H₂S and SO₂ 	
57.B	Rule 57.B	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	<ul style="list-style-type: none"> Not required based on District analysis
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> Annual compliance certification None for PUC-quality gas Annual test for non PUC-quality gas (submit with annual compliance certification) 	<ul style="list-style-type: none"> Annual fuel gas analysis for non PUC-quality gas 	None	<ul style="list-style-type: none"> SCAQMD Method 307-94 	

1.c.3. General Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
64.B.2	Rule 64.B.2	<ul style="list-style-type: none"> Annual compliance certification Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification) 	<ul style="list-style-type: none"> Fuel supplier's certification, or fuel test per each delivery 	None	<ul style="list-style-type: none"> ASTM Method D4294-83 or D2622-87 	
68	Rule 68	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	<ul style="list-style-type: none"> Not required based on District EPA emission factor analysis
71.1.C	Rules 71.1.C and 74.10	<ul style="list-style-type: none"> Annual compliance certification Rule 74.10 inspections Visual inspection to ensure collection system is closed Quarterly inspection of flare to ensure proper operation 	<ul style="list-style-type: none"> Records of inspections of flare Rule 74.10 records 	None	None	<ul style="list-style-type: none"> Compliance with Rule 74.10 ensures compliance with the gas collection system's maintenance requirements
71.4.B.1	Rule 71.4.B.1	<ul style="list-style-type: none"> Annual compliance certification to ensure there are no first stage sumps 	None	None	None	
71.4.B.3	Rule 71.4.B.3	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance and visual inspections of well cellars 	<ul style="list-style-type: none"> Records of maintenance or well workover activity during periods of crude oil storage 	None	None	
74.6	Rule 74.6	<ul style="list-style-type: none"> Annual compliance certification Maintain current solvent information Routine surveillance of solvent cleaning activities Upon request, solvent testing 	<ul style="list-style-type: none"> Records of current solvent information 	None	<ul style="list-style-type: none"> ROC content-EPA Test Method 24 or 24A Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 True vapor pressure or composite partial pressure -ASTM D2879-86 Initial boiling point-ASTM 1078-78 or published source Spray gun active/passive solvent losses-SCAQMD Method (10-3-89) 	

1.c.3. General Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.10	Rule 74.10	<ul style="list-style-type: none"> • Annual compliance certification • Identify leaking components • Inspections every shift or 8 hours at natural gas processing plants • Daily and/or weekly inspections for specified equipment • Quarterly inspections for specified components • Pressure relief valve inspections • Annual update to Operator Management Plan • Notification of major leaks in critical components • Notification of repeat leaks 	<ul style="list-style-type: none"> • Records of leak inspections in inspection log 	None	<ul style="list-style-type: none"> • Gas Leaks - EPA Method 21 • ROC Concentration of Gas Streams - ASTM E169-87, or ASTM E260-85 • Weight percentage of evaporated compounds of liquids - ASTM Method D 86-82 • API Gravity - ASTM Method D287 	
74.11.1	Rule 74.11.1	<ul style="list-style-type: none"> • Annual compliance certification • Maintain identification records of large water heaters and small boilers 	<ul style="list-style-type: none"> • Records of current information of large water heaters and small boilers 	None	None	<ul style="list-style-type: none"> • Rule only applies to future installation of large water heaters and small boilers
74.22	Rule 74.22	<ul style="list-style-type: none"> • Annual compliance certification • Maintain furnace identification records 	<ul style="list-style-type: none"> • Records of current furnace information 	None	None	<ul style="list-style-type: none"> • Rule only applies to future installation of natural gas-fired, fan-type furnaces

1.c.4. General Requirements for Short-Term Activities

The General Requirements for Short-Term Activities Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 10 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance and visual inspections of abrasive blasting operation Abrasive blasting records 	<ul style="list-style-type: none"> Abrasive blasting records 	None	<ul style="list-style-type: none"> Visible emission evaluation-Section 92400 of CCR 	
74.2	Rule 74.2	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance Maintain VOC records of coatings used 	<ul style="list-style-type: none"> Maintain VOC records of coatings used 	None	<ul style="list-style-type: none"> VOC content-EPA Method 24, CARB Method 432 Acid content-ASTM Method D 1613-85, Metal content-SCAQMD Method 311-91 	
74.16	Rule 74.16	<ul style="list-style-type: none"> Annual compliance certification to ensure grid power being used, and/or Annual compliance certification to ensure drilling engine has a valid APCD Permit to Operate, and meets NOx limit, or Maintain cost analysis documentation as verification to grid power exemption, if applicable Annual source tests (NO_x) or engine manufacturer certification 	<ul style="list-style-type: none"> Records of source tests or engine manufacturer certification Records of cost analysis documentation 	None	<ul style="list-style-type: none"> NO_x-ARB Method 100 	

M:\TITLE\TV Permits\PO1492\Permit IV\Periodic Monitoring Table rev241.doc

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Condition Attachment
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 71.1N1	Description: Fugitive Emission Inspection and Maintenance Program (Rule 74.10) Rule 71.1.B.1a. Compliance via vapor recovery
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Daily visual inspections verifying that the vapor recovery is operational on the tanks. Quarterly inspections per Rule 74.10 and EPA Method 21 ensuring that the hatches do not leak.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Condition Attachment
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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">Rule 71.1N6</p>	Description: Crude Oil Production and Separation, Compliance with Vapor Recovery
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Daily visual inspections verifying that the integrity of the roofs and pressure relief valves on the portable tanks. Quarterly inspections per Rule 74.10 EPA Method 21 ensuring that the hatches do not leak. The VRU is a closed system.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Condition Attachment
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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)

Ventura County Air Pollution Control District
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 Applicable Requirement or Part 70 Condition Attachment
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 71.4N1	Description: Petroleum Sumps, Pits, Ponds and Well Cellar Compliance
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Quarterly inspections verifying the integrity of covers and or roofs on sumps. Quarterly inspections per Rule 74.10 EPA Method 21 ensuring that the hatches do not leak.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)

Ventura County Air Pollution Control District
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 71.5N1	Description: Glycol Dehydration Unit
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Glycol Dehydrator did not operate in 2008 and has been removed from permit.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Condition Attachment
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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 74.9N7	Description: Stationary Internal Combustion Engines
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Emergency standby stationary internal combustion engine only operated during an emergency or during maintenance operation of not more than 50 hours per calendar year.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 74.9N9	Description: Stationary Internal Combustion Engines
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

All crane and welder IC engines are diesel fired. These engines are used to power the cranes and welders only.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:
- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
Rule 74.15.1N1	Boilers, Steam Generators, and Process Heaters

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Biennial emission source testing to ensure that the uniflux heater is operating within the normal parameters. The heater is scheduled for testing in 2009.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
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CMS

CONDITION MONITORING SERVICES INC.

GAS FIRED BURNER EMISSION TEST

Prepared for:



Dos Cuadras Offshore Resources

PLATFORM GILDA

DATE: 4/22/2008

EQUIPMENT TYPE: Uniflux Heater
MODEL NUMBER: Mobiltherm 600
SERIAL NUMBER: 4302
FGR OUTPUT VALUE: 62%
HEAT MEDIUM SP 270

FUEL: Natural Gas
FUEL USE: 37 MCFD
REGULATOR PRES. 4.40 LBS
STACK TEMP. 819 F.
TESTED BY: Kirk Comany

EMISSION DATA

RAW DATA

	RUN 1	RUN 2	RUN 3	RUN 4	AVERAGE
O2	1.9	1.9	2.1	1.9	2.0
NOx	13	13	13	14	13.3
CO	304	308	323	336	317.8

CORRECTED TO 3% O2

	RUN 1	RUN 2	RUN 3	RUN 4	AVERAGE	LIMITS
O2	1.9	1.9	2.1	1.9	2.0	N/A
*NOx	12	12	12	13	12.5	30
*CO	286	290	308	317	300.2	400

*Corrected figures are rounded.

COMMENTS:

Unit was found to be operating within limits. No adjustment was done.

Unit fuel gas chart indicated a steady firing rate.

Ecom unit was calibrated 04/15/08 and NO was rechecked with cal gas on site.

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1492 Permit Condition 1 Item 1	Description: Monthly Records of Throughput and Fuel Consumption: Rule 29
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Records maintained for platform throughput, equipment hours of operations, and fuel consumption.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
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PLATFORM GILDA DIESEL CRANES FUEL USAGE

GILDA	NORTH CRANE		
	Hours	Gallons	12 Mo. Rolling Total Gallons
2007 - 2008			
Jan-07	133	1,862	8,232
Feb-07	163	2,282	10,416
Mar-07	45	630	10,962
Apr-07	162	2,268	13,037
May-07	17	238	12,978
Jun-07	19	266	12,908
Jul-07	12	168	12,936
Aug-07	3	42	12,474
Sep-07	0.8	11	12,163
Oct-07	14	196	9,825
Nov-07	22	308	8,607
Dec-07	23	322	8,593
Jan-08	9	126	6,857
Feb-08	49	686	5,261
Mar-08	79	1,106	5,737
Apr-08	143	2,002	5,471
May-08	42	588	5,821
Jun-08	193	2,702	8,257
Jul-08	203	2,842	10,931
Aug-08	64	896	11,785
Sep-08	64	896	12,670
Oct-08	100	1,400	13,874
Nov-08	49	686	14,252
Dec-08	35	490	14,420
North Crane permit limits	19,250 gal/yr		

GILDA	SOUTH CRANE		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-07	89	1,246	8,106
Feb-07	116	1,624	9,562
Mar-07	7	98	9,471
Apr-07	59	826	10,080
May-07	17	238	9,912
Jun-07	15	210	9,688
Jul-07	14	196	9,674
Aug-07	14	196	9,226
Sep-07	1.1	15	8,205
Oct-07	21	294	7,281
Nov-07	16	224	5,587
Dec-07	24	336	5,503
Jan-08	10	140	4,397
Feb-08	74	1,036	3,809
Mar-08	68	952	4,663
Apr-08	61	854	4,691
May-08	40	560	5,013
Jun-08	61	854	5,657
Jul-08	51	714	6,175
Aug-08	173	2,422	8,401
Sep-08	164	2,296	10,682
Oct-08	120	1,680	12,068
Nov-08	159	2,226	14,070
Dec-08	153	2,142	15,876
South Crane permit limits	17,200 gal/yr		

DIESEL CRANES FUEL USAGE - PLATFORM GILDA
conversion factor hr to gal = 14 gal/hr

**PLATFORM GILDA BOOM BOAT
FUEL USAGE 2007-2008**

	Usage	12 Mo 'Running' Total
	Gasoline	Gasoline
	gal	gal
Jan-07	0	5.55
Feb-07	0	5.55
Mar-07	0	5.55
Apr-07	0.03	5.58
May-07	0.7	6.28
Jun-07	0.07	6.31
Jul-07	0.04	6.29
Aug-07	0	6.29
Sep-07	0.14	6.41
Oct-07	0	6.36
Nov-07	0	6.36
Dec-07	0.02	1.0
Jan-08	0	1.0
Feb-08	0.1	1.1
Mar-08	0.01	1.1
Apr-08	0	1.1
May-08	0	0.4
Jun-08	0.25	0.6
Jul-08	0.3	0.8
Aug-08	3.2	4.0
Sep-08	0.25	4.1
Oct-08	0.15	4.3
Nov-08	0.1	4.4
Dec-08	0	4.4

Note: Starting in 6/08, fuel use calculated based on hourly usage and rate of 0.5 gallon/hour

Permit	
limits, gal	500

**PLATFORM GILDA HEATER
FUEL USAGE 2007-2008
UNIFLUX HEATER**

	Usage		12 Mo 'Rolling' Total
	Natural gas		Natural gas
	mcf	mmscf	mmscf
Jan-07	1365	1.37	19.67
Feb-07	1144	1.14	19.09
Mar-07	1261	1.26	18.90
Apr-07	1226	1.23	18.56
May-07	1298	1.30	18.43
Jun-07	1201	1.20	17.88
Jul-07	1270	1.27	17.62
Aug-07	1270	1.27	18.08
Sep-07	1247	1.25	17.82
Oct-07	1270	1.27	17.44
Nov-07	1238	1.24	16.97
Dec-07	1381	1.38	16.75
Jan-08	1221	1.22	16.39
Feb-08	1105	1.11	16.13
Mar-08	1228	1.23	16.22
Apr-08	1157	1.16	16.11
May-08	1238	1.24	16.12
Jun-08	1199	1.20	16.03
Jul-08	1145	1.15	15.97
Aug-08	1189	1.19	15.89
Sep-08	1155	1.16	15.77
Oct-08	1108	1.11	15.63
Nov-08	1110	1.11	15.47
Dec-08	1022	1.02	15.26

Permit limit, mmscf/yr		36.6

Natural Gas Usage Meter 3710

**PLATFORM GILDA HTM GAS (METER 3710)
2008 MCF**

Days	January	February	March	April	May	June	July	August	September	October	November	December
1	44	35	39	39	40	36	38	45	40	39	35	35
2	45	37	40	39	40	36	38	34	40	38	35	36
3	43	38	40	39	40	38	38	34	40	38	35	36
4	43	38	40	39	40	51	38	34	40	37	35	36
5	42	38	40	39	40	38	38	34	40	37	35	36
6	42	38	40	40	36	39	38	41	39	38	35	36
7	42	37	40	39	40	38	37	40	40	35	35	36
8	46	37	40	37	48	36	36	40	40	35	36	36
9	34	37	40	38	48	36	37	40	40	44	34	36
10	37	37	40	36	47	36	37	40	39	34	35	36
11	37	37	40	38	48	37	36	40	40	34	35	33
12	37	38	40	39	48	38	35	35	37	35	33	33
13	37	37	40	37	48	37	35	39	37	35	35	34
14	37	40	39	38	47	36	36	34	37	34	40	32
15	37	40	40	38	37	37	35	39	37	33	42	35
16	37	37	40	38	37	37	35	39	37	36	38	30
17	47	37	40	38	37	37	36	38	37	39	35	31
18	37	40	40	38	37	37	35	38	31	38	35	29
19	38	39	40	38	36	47	35	39	37	38	35	34
20	37	39	38	38	36	47	36	39	40	35	42	30
21	36	40	40	38	39	47	36	40	40	35	42	28
22	38	37	40	39	36	47	36	36	40	36	41	31
23	40	40	40	38	37	47	35	35	39	34	41	30
24	40	40	39	39	36	47	38	37	40	34	41	33
25	39	39	40	40	36	47	38	37	38	34	41	35
26	40	38	39	39	36	38	38	39	39	34	41	31
27	40	40	38	39	37	38	38	37	38	34	35	32
28	38	38	39	40	38	38	38	38	38	34	36	31
29	36	37	39	40	38	38	35	36	37	34	37	30
30	37		39	40	37	38	37	40	38	33	35	30
31	38		39		38		47	52		34		31
Total	1221	1105	1228	1157	1238	1199	1145	1189	1155	1108	1110	1022

Year End Total 13877

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PTO 1492 Permit Condition 1 Item 2	Maximum Number of Oil Wells: Rule 29

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

The platform is permitted with the maximum number of wells, this number cannot be exceeded. This platform has 48 slots with oilwell completions. Annual Compliance Certification.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">PTO 1492 Permit Condition 1 Item 3</p>	Description: <p style="text-align: center;">Well Operations: BACT Requirements: Rule 26</p>
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual Compliance Certification verifying that the wells S-89 (slot 6), S-87 (slot 28) and S-28 (slot 58) are free flowing, have operated on gas lift, or with electric motor driven artificial lift equipment.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1492 Permit Condition 1 Item 4	Description: Maximum Sulfur Content of Diesel Fuel: Rule 29
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Records of sulfur content of diesel fuel maintained from fuel supplier.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
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- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

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GENERAL PETROLEUM

12/31/08

Letter of Conformance

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and

Delivered to M/V RYAN T, M/V LUKE & M/V PATRICK FROM
01/01/08-12/31/08

was in compliance with South Coast Air Quality Management District
Requirements for Santa Barbara, Ventura and Los Angeles Counties.

The test Results meet ASTM D-4294 and is typical of all CARB Ultra Low Sulfur
Dyed Diesel Fuel sold by General Petroleum. The sulfur content is Guaranteed to
be less than .0015%. (15PPM) The high heat content is typically in the 19,950 to
20,200 BTU per pound range.

Hope Bowles

General Manager
General Petroleum
Oxnard Division
Office (805) 299-1219



Hazen Research, Inc.
 4601 Indiana Street
 Golden, CO 80403 USA
 Tel: (303) 279-4501
 Fax: (303) 278-1528

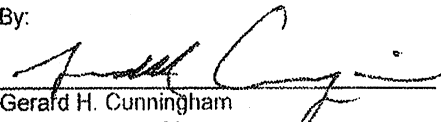
DATE September 5, 2008
 PROJ. # 009-479
 CTRL # H285/08
 REC'D 08/22/08

Aeros Environmental, Inc.
 Lisa Marriott-Smith
 18828 Highway 65
 Bakersfield, California 93308

Sample Number: H285/08-1
 Sample Identification: Diesel Fuel OCS Supply Boat Ryan T Project #092-6122

	As Assayed	Normalized
ULTIMATE		
Water, %	0.013	0.013
Ash, %	<0.001	<0.001
Sulfur, %	0.009	0.009
Carbon, %	90.62	87.52
Hydrogen, %	12.9	12.5
Nitrogen, %	<0.01	<0.01
Oxygen, %*	<0.01	0.00
PROXIMATE		
Water, %	0.013	0.013
Ash, %	<0.001	<0.001
Volatile Matter, %	99.99	99.99
Fixed Carbon, %*	<0.01	0.00
Calorific Value, BTU/gallon	137,684	
Calorific Value, BTU/lb	19,852	
API Gravity	38.8	
Density, g/cc	0.831	
F-Factor, DSCF/MMBTU		8893 C 60° 9030 C 68°

By:


 Gerald H. Cunningham
 Fuel Laboratory Manager

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Condition Attachment
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1492 Permit Condition 1 Item 5	Description: Crew and Work Boat Emission Limits: Rule 29
---	---

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Daily records of diesel fuel consumption and emission calculations using Ventura County APCD approved emission factors. Fuel consumption is determined through either inline non-resettable meter or onboard daily soundings.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)

Platforms Gina and Gilda Fuel Usage (in Gallons)

Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 75%
Jan-07	11,652	2,913	8,739
Feb-07	10,550	2,638	7,913
Mar-07	13,003	3,251	9,752
Apr-07	11,301	2,825	8,476
May-07	10,450	2,613	7,838
Jun-07	10,455	2,614	7,841
Jul-07	11,052	2,763	8,289
Aug-07	9,730	2,433	7,298
Sep-07	9,198	2,300	6,899
Oct-07	10,275	2,569	7,706
Nov-07	12,720	3,180	9,540
Dec-07	10,700	2,675	8,025
Jan-08	10,625	2,656	7,969
Feb-08	11,827	2,957	8,870
Mar-08	13,276	3,319	9,957
Apr-08	15,602	3,901	11,702
May-08	15,150	3,788	11,363
Jun-08	12,800	3,200	9,600
Jul-08	14,150	3,538	10,613
Aug-08	12,850	3,213	9,638
Sep-08	12,900	3,225	9,675
Oct-08	14,070	3,518	10,553
Nov-08	12,075	3,019	9,056
Dec-08	11,950	2,988	8,963

Supply Boat Fuel Usage

	Gina		Gilda	
	Mains	Aux	Mains	Aux
Jan-07	796.6	33.19	2389.9	99.57
Feb-07	925.8	38.57	2777.2	115.71
Mar-07	420.7	17.53	1262.2	52.59
Apr-07	697.1	29.05	2091.3	87.14
May-07	234.9	9.81	706.3	29.43
Jun-07	179.9	7.5	539.7	22.49
Jul-07	72.9	3.04	218.8	9.12
Aug-07	506	5.06	1518	63.25
Sep-07	136.4	5.68	409.2	17.05
Oct-07	445.78	18.57	1337.23	55.71
Nov-07	202.35	8.43	607.04	25.29
Dec-07	151.01	6.29	453.07	18.87
Jan-08	126	5.25	378.1	15.76
Feb-08	374.3	15.6	1122.9	46.79
Mar-08	568.6	23.69	1705.8	71.07
Apr-08	635.5	26.48	1906.5	79.44
May-08	440.1	18.34	1320.4	55.01
Jun-08	493.4	20.56	1480.1	61.67
Jul-08	635.4	26.47	1906.2	79.42
Aug-08	349.0	3.49	1047.1	43.63
Sep-08	530.3	22.1	1591	66.29
Oct-08	446.26	18.59	1338.78	55.78
Nov-08	692.66	28.86	2077.98	86.58
Dec-08	549.63	22.9	1648.89	68.7

	Rolling 12 Mo Total	
	Gina	Gilda
	36,894	107,727
	37,728	111,278
	38,508	114,246
	40,513	117,917
	40,951	118,307
	40,542	118,726
	40,818	119,299
	39,908	117,917
	39,579	113,807
	39,459	112,642
	38,321	112,383
	39,176	113,221
	37,259	110,355
	36,888	109,589
	36,887	110,256
	38,817	113,289
	39,419	117,454
	40,977	120,192
	41,830	124,274
	42,345	126,123
	43,628	130,131
	45,095	132,979
	45,849	134,027
	46,716	136,210

Platform Gina Permitted Fuel Total: 84,398
 Platform Gilda Permitted Fuel Total: 253,390

Platforms Gina and Gilda
Annual Crew and Supply Boat Emissions
 (Based Upon 12 Month "Rolling" Total Fuel Usage)

	Platform Gina						Platform Gilda							
	ROC TPY	NOx TPY	PM TPY	SOx TPY	CO TPY	ROC TPY	NOx TPY	PM TPY	SOx TPY	CO TPY	ROC TPY	NOx TPY	PM TPY	SOx TPY
Jan-07	0.61	10.35	0.62	0.14	1.88	1.79	30.22	1.80	0.40	5.49				
Feb-07	0.63	10.58	0.63	0.14	1.92	1.85	31.21	1.86	0.42	5.68				
Mar-07	0.64	10.80	0.65	0.14	1.96	1.90	32.05	1.91	0.43	5.83				
Apr-07	0.67	11.36	0.68	0.15	2.07	1.96	33.08	1.98	0.44	6.01				
May-07	0.68	11.49	0.69	0.15	2.09	1.96	33.19	1.98	0.44	6.03				
Jun-07	0.67	11.37	0.68	0.15	2.07	1.97	33.30	1.99	0.45	6.06				
Jul-07	0.68	11.45	0.68	0.15	2.08	1.98	33.46	2.00	0.45	6.08				
Aug-07	0.66	11.19	0.67	0.15	2.04	1.96	33.08	1.98	0.44	6.01				
Sep-07	0.66	11.10	0.66	0.15	2.02	1.89	31.92	1.91	0.43	5.80				
Oct-07	0.66	11.07	0.66	0.15	2.01	1.87	31.60	1.89	0.42	5.74				
Nov-07	0.64	10.75	0.64	0.14	1.95	1.87	31.52	1.88	0.42	5.73				
Dec-07	0.65	10.99	0.66	0.15	2.00	1.88	31.76	1.90	0.42	5.77				
Jan-08	0.62	10.45	0.62	0.14	1.90	1.83	30.95	1.85	0.41	5.63				
Feb-08	0.61	10.35	0.62	0.14	1.88	1.82	30.74	1.84	0.41	5.59				
Mar-08	0.61	10.35	0.62	0.14	1.88	1.83	30.93	1.85	0.41	5.62				
Apr-08	0.64	10.89	0.65	0.15	1.98	1.88	31.78	1.90	0.42	5.78				
May-08	0.65	11.06	0.66	0.15	2.01	1.95	32.95	1.97	0.44	5.99				
Jun-08	0.68	11.49	0.69	0.15	2.09	2.00	33.71	2.01	0.45	6.13				
Jul-08	0.69	11.73	0.70	0.16	2.13	2.06	34.86	2.08	0.47	6.34				
Aug-08	0.70	11.88	0.71	0.16	2.16	2.09	35.38	2.11	0.47	6.43				
Sep-08	0.72	12.24	0.73	0.16	2.23	2.16	36.50	2.18	0.49	6.64				
Oct-08	0.75	12.65	0.76	0.17	2.30	2.21	37.30	2.23	0.50	6.78				
Nov-08	0.76	12.86	0.77	0.17	2.34	2.22	37.59	2.24	0.50	6.84				
Dec-08	0.78	13.10	0.78	0.18	2.38	2.26	38.21	2.28	0.51	6.95				

Emission Factors	
ROC	33.2 lb/Mgal
NOx	561 lb/Mgal
PM	33.5 lb/Mgal
SOx	7.5 lb/Mgal
CO	102 lb/Mgal

Permitted Emissions	
Plt Gina	Plt Gilda
	1.4
	4.2
	TPY
	23.67
	71.07
	TPY
	1.41
	4.24
	TPY
	0.31
	0.95
	TPY
	4.31
	12.92
	TPY

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1492 Condition1 Item 6	Description: Two Crew Boats Shall not be used Simultaneously: Rule 29
---	--

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Log book maintained confirming crew boat activity including hours, days, and location of activity. Annual certification of compliance.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:
- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)

Ventura County Air Pollution Control District
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1492 Condition1 Item 7	Description: Two Work Boats Shall not be used Simultaneously: Rule 29
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Log book maintained confirming work boat activity including hours, days, and location of activity. Annual certification of compliance.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

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Ventura County Air Pollution Control District
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Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)

Ventura County Air Pollution Control District
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1492 Permit Condition 1 Item 8	Description: Solvent Recordkeeping: Rule 29
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Monthly records maintained of quantity of solvent use and purchases for solvents with ROC content of 25 grams per liter or greater. Chemco 33-S has ROC content of 44 grams/liter and is only used when diluted 1:1 with water. No other solvents with ROC content of 25 grams per liter or greater were used during 2008.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

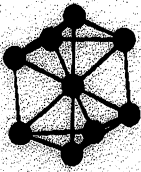
- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District
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Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)



American Research and Testing Inc.

14934 SOUTH FIGUEROA STREET
GARDENA CA 90248
(310) 538-9709 FAX (310) 538-9965
www.americanresearch.com

CLIENT: Flo-Kem, Inc..
19402 Susana Rd.
Rancho Dominguez CA 90221

NUMBER
207-11-095
November 14, 2007

SUBJECT: VOC of Chemco 33-S

REFERENCE:

Tests and charges were authorized by Mr. Kishor Pathak on 11/9/07.

SAMPLE DESCRIPTION:

The Client submitted and identified one container of Chemco 33-S Water-Based Cleaner.

REQUEST:

Determine the VOC of the sample.

METHOD:

VOC of the sample was determined from total volatile content, water content, and density following the methodology specified in EPA Method 24 and CARB Method 310. Volatile content was determined gravimetrically per ASTM D2369. Water was determined by pyridine-free Karl Fischer titration, per ASTM D4017, in a reaction medium designed to handle the high pH of the sample. Density was determined per ASTM D1475, using a calibrated pycnometer. VOC was calculated from these data.

RESULTS:

	Chemco 33-S
Total Volatile Matter (weight percent)	83.75
Water Content (weight percent)	82.14
Density at 25 °C (g/ml)	1.064
VOC, expressed per EPA Method 24 (weight fraction)	0.0161
VOC, expressed per CARB Method 310 (weight percent)	1.61
VOC of material, expressed per SCAQMD Rule 443.1 as grams/liter (pounds/gallon)	17 g/L (0.142 lb/gal)

SIGNED FOR THE COMPANY
by

B. Belmont

B. Belmont
Senior Chemist

Rita R. Boggs, Ph.D.

Rita R. Boggs, Ph.D.
President

Ventura County Air Pollution Control District
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1492 Condition 2 Section 1 & 4	Description: Flare Fuel Consumption: Rule 29
---	---

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Monthly records of fuel consumption and flare activity monitored by individual fuel meters on the flare.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
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Time Period Covered by Compliance Certification:

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**PLATFORM GILDA
FLARE USAGE (MMSCF)**

2007-2008	Pilot	Planned	Unplanned	12 Month 'Rolling' Total	
	MCF	MCF	MCF	Pilot MMSCF	Planned MMCF
Jan-07	28	0	45	0.7771	0.63
Feb-07	23	0	24	0.7511	0.65
Mar-07	30	0	0	0.7581	0.65
Apr-07	30	0	6	0.7564	0.66
May-07	30	0	105	0.7464	0.67
Jun-07	28	15	16	0.7414	0.60
Jul-07	29	0	8	0.7354	0.59
Aug-07	29	867	0	0.7473	0.36
Sep-07	30	0	31	0.7459	0.32
Oct-07	31	3	0	0.7053	0.31
Nov-07	30	0	0	0.6990	0.25
Dec-07	24	0	1168	0.6890	1.40
Jan-08	24	13	315	0.6810	1.67
Feb-08	19	8	9	0.6850	1.66
Mar-08	23	0	7	0.6780	1.67
Apr-08	23	0	93	0.6710	1.75
May-08	24	0	63	0.6650	1.71
Jun-08	23	0	7	0.6580	1.70
Jul-08	26	0	38	0.6540	1.73
Aug-08	25	0	131	0.6490	1.86
Sep-08	24	0	126	0.6430	1.96
Oct-08	13	0	224	0.6260	2.18
Nov-08	10	0	33	0.6060	2.21
Dec-08	12	0	101	0.5880	1.15

Permit Limit Planned Flaring MMCF/YR **50.51**

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Jan-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
1/4/08	9:45	10:45	65	0.5	GC-2 S/D Changed Oil Pump	UNPLANNED	JW	
1/4/08	16:40	16:43	2	0.5	GC-2 S/C Lube Differential	UNPLANNED	JW	
1/5/08	7:30	8:45	78	0.7	GC-2 S/D Due to Gas S/I @ MOSF	UNPLANNED	JW	
1/6/08	8:50	8:55	13	0.5	GC-2 S/D Changed Oil Pump	UNPLANNED	JW	
1/22/08	5:00	5:05	13	0.5	Edison S/D Electrical Maintenance	PLANNED	JW	
1/28/08	11:00	12:00	64	0	GC-2 Light Bulb in Panel Shorted in Panel Tripping Breaker	UNPLANNED	FS	
1/31/08	4:25	6:55	93	0	MOSF S/D Gas Line S/I	UNPLANNED	PD	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. **B)** Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. **C)** Planned and unplanned flaring of <300 ppm gas only requires logging. **D)** Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S			Feb-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS		
2/10/08	9:00	11:00	8	320ppm	Replace Diaphragm on Acid Gas Comp. Pilot Valve	PLANNED	RP		
2/28/08	16:25	16:31	9	1	S/D Due to PSL on Oil Line	UNPLANNED	FP		

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S			Mar-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS		
3/21/08	20:00	20:03	4	Sweet	Platform Upset	UNPLANNED	F.S		
3/29/08	13:00	13:03	3	Sweet	Acid Gas Compressor S/D	UNPLANNED	J.W		

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"				Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Apr-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
4/18/08	10:00	10:05	3	none	testing amine plant	unplanned	A.D.
4/23/08	10:30	13:10	90	NONE	Gas compressor shut dwn.	unplanned	R.T.

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		May-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
5/21/08	12:00	7:00	63	29	change out htm saddle bearings, acid gas s/d	UNPLANNED	F.S.	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. **B)** Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. **C)** Planned and unplanned flaring of <300 ppm gas only requires logging. **D)** Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"							Jun-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
6/4/08	17:45	17:51	7	0	Cas Compressor #2 Shut Down	UNPLANNED	T.S.	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. **B)** Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. **C)** Planned and unplanned flaring of <300 ppm gas only requires logging. **D)** Pla

RULE 54 PLATFORM GILDA FLARE LOG

DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S			Jul-08
7/8/08	6:30	6:40	38	0	Chiller Unit Upset	UNPLANNED	J.W.	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. **B)** Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. **C)** Planned and unplanned flaring of <300 ppm gas only requires logging. **D)** Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Aug-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
8/6/08	8:00	8:02	4	0	Platform S/D - Electrical	UNPLANNED	J.W.	
8/6/08	11:00	12:00	33	0	Platform Start Up	UNPLANNED	J.W.	
8/6/08	16:00	16:02	7	0	Platform S/D - Electrical	UNPLANNED	J.W.	
8/12/08	15:40	15:43	8	0	Amine Upset & GC-2 S/D	UNPLANNED	J.A.	
8/13/08	14:10	14:13	3	0	Test run GC-3	UNPLANNED	J.A.	
8/15/08	2:00	2:05	17	0	G-2 S/D Power Flicker	UNPLANNED	J.W.	
8/22/08	13:00	13:07	14	0	Amine upsets X 4 mins. Total	UNPLANNED	F.S.	
8/28/08	4:00	4:05	3	0	Power Flicker	UNPLANNED	R.T.	
8/30/08	3:00	7:15	42	0	Lost Shore Power - MOSF SCE Substation	UNPLANNED	A.D.	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S			Sep-08
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
9/4/08	8:00	8:03	7	0	Amine Plant Upset	UNPLANNED	R.T.	
9/7/08	3:50	4:20	19	0	Platform S/D (MOSF) Transformer S/D	UNPLANNED	F.S.	
9/11/08	10:00	10:04	5	0	Acid Gas Compressor Shut Down	UNPLANNED	L.V.	
9/11/08	11:00	11:03	3	0	Amine Plant Upset	UNPLANNED	A.D.	
9/13/08	6:25	7:45	68	0	Sales Line S/I @ MOSF	UNPLANNED	J.W.	
9/16/08	7:20	7:23	3	0	Gas Compressor #2 S/D	UNPLANNED	L.V.	
9/18/08	10:30	10:35	21	0	Gas Compressor #2 S/D - Amine Plant Upset	UNPLANNED	F.S.	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"				Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Oct.08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
10/9/08	15:00	15:03	13	0	Gas comp #2 shut down	unplanned	L.V.
10/10/08	11:30	13:00	191	0	MOSF Sales gas valve got shut in	unplanned	L.V.
10/13/08	8:55	8:57	14	0	Gas comp. shut down due to amine plant upset	unplanned	L.V.
10/14/08	5:00	5:03	3	0	Acid gas comp. upset	unplanned	A.D.
10/30/08	19:00	19:07	3	0	Gas comp shut down due to vibration	unplanned	T.S.

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. **B)** Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. **C)** Planned and unplanned flaring of <300 ppm gas only requires logging. **D)** Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "X"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S			Nov-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS		
11/2/08	11:05	11:10	5	0	Amine Plant Upset	UNPLANNED	T.S		
11/13/08	12:00	1	2.2	0	Amine Plant Upset	UNPLANNED	A.D		
11/22/08	14:29	14:30	2	0	Amine Plant Upset	UNPLANNED	A.D		
11/27/08	13:10	13:40	24	0	Lost Power from MOSF	UNPLANNED	T.S		

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">PTO 1492 Condition 2 Sections 2 & 3</p>	Description: <p style="text-align: center;">Flare Ignition System: Rule 71.1</p>
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Flare has continuous pilot fed by sweet gas.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- 3 Please indicate if this compliance determination method is continuous or intermittent:
- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">PTO 1492 Condition 3 Sections 1 & 2</p>	Description: <p style="text-align: center;">New Source Review: Rule 26; and, Stationary Internal Combustion Engines: Rule 74.9</p>
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Non resettable hour meters are installed on the back-up utility generator. Logs are maintained of the daily usage. The engine is used less than 200 hours per calendar year and less than 50 hours during routine maintenance and the therefore exempt from Rule 74.9 Section D.2 and D.3.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**PLATFORM GILDA
PRODUCTION GENERATOR**

2008	HOURS	
	Non-Emergency	Emergency
Jan-08	1	
Feb-08	1	
Mar-08	1	
Apr-08	1	
May-08	1	
Jun-08	1	
Jul-08	1	
Aug-08	0.2	4.25
Sep-08	1	
Oct-08	0.4	
Nov-08	0.5	
Dec-08	1.3	1.5

HOURS	
Monthly Total	Annual Total
1.0	1.0
1.0	2.0
1.0	3.0
1.0	4.0
1.0	5.0
1.0	6.0
1.0	7.0
4.5	11.5
1.0	12.5
0.4	12.9
0.5	13.4
2.8	16.2

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 50	Description: Visible Emissions
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Perform routine surveillance and visual inspections to ensure that compliance with Rule 50 is being maintained.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

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Visible Emissions Inspection Record - VCAPCD

Date	Time	Inspected by	Emission Unit	Observations/Corrective Action
22-Apr-08	10:12-10:14	Kirk Cormany	HTM Heater	No Visible Emissions
22-Apr-08	8:12-8:14	Kirk Cormany	North Crane	No Visible Emissions
22-Apr-08	8:40-8:42	Kirk Cormany	South Crane	No Visible Emissions
22-Apr-08	11:35-11:37	Kirk Cormany	Standby Generator	No Visible Emissions

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 52	Description: Particulate Matter Concentration
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Calculations based on Ventura County APCD approved methods

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 54 B 1 and 2	Description: Sulfur Compounds
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Record all flare events that exceed one hour or are sour. Source testing upon request.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Platform Gilda 2008 Flaring Events						
Flare Date	MCF flared	Sweet Gas Emission factor lb/MMCF	SO2 Emissions lb	H2S ppm	Sour Gas Emission factor lb/MMCF	SO2 Emissions lb
1/4/08	65	0.5	0.033	0	0.00	0.000
1/4/08	2	0.5	0.001	0	0.00	0.000
1/5/08	78	0.6	0.047	0	0.00	0.000
1/6/08	13	0.7	0.009	0	0.00	0.000
1/22/08	13	0.5	0.007	0	0.00	0.000
1/28/08	64	0.5	0.032	0	0.00	0.000
1/31/08	93	0.6	0.056	0	0.00	0.000
2/10/08	8	0	0.000	320	54.04	0.432
2/28/08	9	1	0.009	0	0.00	0.000
3/21/08	4	0.6	0.002	0	0.00	0.000
3/29/08	3	0.6	0.002	0	0.00	0.000
4/18/08	3	0.6	0.002	0	0.00	0.000
4/23/08	90	0.6	0.054	0	0.00	0.000
5/21/08	63	0	0.000	29	4.90	0.309
6/4/08	7	0.6	0.004	0	0.00	0.000
7/8/08	38	0.6	0.023	0	0.00	0.000
8/6/08	4	0.6	0.002	0	0.00	0.000
8/6/08	33	0.6	0.020	0	0.00	0.000
8/6/08	7	0.6	0.004	0	0.00	0.000
8/12/08	8	0.6	0.005	0	0.00	0.000
8/13/08	3	0.6	0.002	0	0.00	0.000
8/15/08	17	0.6	0.010	0	0.00	0.000
8/22/08	14	0.6	0.008	0	0.00	0.000
8/28/08	3	0.6	0.002	0	0.00	0.000
8/30/08	42	0.6	0.025	0	0.00	0.000
9/4/08	7	0.6	0.004	0	0.00	0.000
9/7/08	19	0.6	0.011	0	0.00	0.000
9/11/08	5	0.6	0.003	0	0.00	0.000
9/11/08	3	0.6	0.002	0	0.00	0.000
9/13/08	68	0.6	0.041	0	0.00	0.000
9/16/08	3	0.6	0.002	0	0.00	0.000
9/18/08	21	0.6	0.013	0	0.00	0.000
10/9/08	13	0.6	0.008	0	0.00	0.000
10/10/08	191	0.6	0.115	0	0.00	0.000
10/13/08	14	0.6	0.008	0	0.00	0.000
10/14/08	3	0.6	0.002	0	0.00	0.000
10/30/08	3	0.6	0.002	0	0.00	0.000
11/2/08	5	0.6	0.003	0	0.00	0.000
11/13/08	2.2	0.6	0.001	0	0.00	0.000
11/22/08	2	0.6	0.001	0	0.00	0.000
11/27/08	24	0.6	0.014	0	0.00	0.000
12/23/08	43	1	0.043	0	0.00	0.000
12/24/09	58	1	0.058	0	0.00	0.000
TOTAL	1168.2		0.69			0.74
TOTAL SULFUR EMISSIONS					1.43	lb SO2
Annual Limits:						
27,012 MCF/year (per VCAPCD, platform specific limit based on previous 5 years from when rules were written)						
1.80 tons SOx/year (per PTO 1492, Table 4)						

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Jan-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
1/4/08	9:45	10:45	65	0.5	GC-2 S/D Changed Oil Pump	UNPLANNED	JW	
1/4/08	16:40	16:43	2	0.5	GC-2 S/C Lube Differential	UNPLANNED	JW	
1/5/08	7:30	8:45	78	0.7	GC-2 S/D Due to Gas S/I @ MOSF	UNPLANNED	JW	
1/6/08	8:50	8:55	13	0.5	GC-2 S/D Changed Oil Pump	UNPLANNED	JW	
1/22/08	5:00	5:05	13	0.5	Edison S/D Electrical Maintenance	PLANNED	JW	
1/28/08	11:00	12:00	64	0	GC-2 Light Bulb in Panel Shorted in Panel Tripping Breaker	UNPLANNED	FS	
1/31/08	4:25	6:55	93	0	MOSF S/D Gas Line S/I	UNPLANNED	PD	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"						Feb-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
2/10/08	9:00	11:00	8	320ppm	Replace Diaphragm on Acid Gas Comp. Pilot Valve	PLANNED	RP
2/28/08	16:25	16:31	9	1	S/D Due to PSL on Oil Line	UNPLANNED	FP

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Mar-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
3/21/08	20:00	20:03	4	Sweet	Platform Upset	UNPLANNED	F.S	
3/29/08	13:00	13:03	3	Sweet	Acid Gas Compressor S/D	UNPLANNED	J.W	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

RULE 54 PLATFORM GILDA FLARE LOG

DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	Apr-08
4/18/08	10:00	10:05	3	none	testing amine plant	unplanned	A.D.	
4/23/08	10:30	13:10	90	NONE	Gas compressor shut dwn.	unplanned	R.T.	

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"

Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. **B)** Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. **C)** Planned and unplanned flaring of <300 ppm gas only requires logging. **D)** Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"				Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		May-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
5/21/08	12:00	7:00	63	29	change out htm saddle bearings, acid gas s/d	UNPLANNED	F.S.

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. **B)** Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. **C)** Planned and unplanned flaring of <300 ppm gas only requires logging. **D)** Pla

RULE 54 PLATFORM GILDA FLARE LOG

DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S	Jul-08	
							PLANNED OR UNPLANNED	OPERATOR INITIALS
7/8/08	6:30	6:40	38	0	Chiller Unit Upset		UNPLANNED	J.W.

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. **B)** Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. **C)** Planned and unplanned flaring of <300 ppm gas only requires logging. **D)** Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Aug-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
8/6/08	8:00	8:02	4	0	Platform S/D - Electrical	UNPLANNED	J.W.	
8/6/08	11:00	12:00	33	0	Platform Start Up	UNPLANNED	J.W.	
8/6/08	16:00	16:02	7	0	Platform S/D - Electrical	UNPLANNED	J.W.	
8/12/08	15:40	15:43	8	0	Amine Upset & GC-2 S/D	UNPLANNED	J.A.	
8/13/08	14:10	14:13	3	0	Test run GC-3	UNPLANNED	J.A.	
8/15/08	2:00	2:05	17	0	G-2 S/D Power Flicker	UNPLANNED	J.W.	
8/22/08	13:00	13:07	14	0	Amine upsets X 4 4 mins. Total	UNPLANNED	F.S	
8/28/08	4:00	4:05	3	0	Power Flicker	UNPLANNED	R.T.	
8/30/08	3:00	7:15	42	0	Lost Shore Power - MOSF SCE Substation	UNPLANNED	A.D	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "X"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Sep-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
9/4/08	8:00	8:03	7	0	Amine Plant Upset	UNPLANNED	R.T.	
9/7/08	3:50	4:20	19	0	Platform S/D (MOSF) Transformer S/D	UNPLANNED	F.S.	
9/11/08	10:00	10:04	5	0	Acid Gas Compressor Shut Down	UNPLANNED	L.V.	
9/11/08	11:00	11:03	3	0	Amine Plant Upset	UNPLANNED	A.D.	
9/13/08	6:25	7:45	68	0	Sales Line S/I @ MOSF	UNPLANNED	J.W.	
9/16/08	7:20	7:23	3	0	Gas Compressor #2 S/D	UNPLANNED	L.V.	
9/18/08	10:30	10:35	21	0	Gas Compressor #2 S/D - Amine Plant Upset	UNPLANNED	F.S.	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"						Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Oct.08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS		
10/9/08	15:00	15:03	13	0	Gas comp #2 shut down	unplanned	L.V.		
10/10/08	11:30	13:00	191	0	MOSF Sales gas valve got shut in	unplanned	L.V.		
10/13/08	8:55	8:57	14	0	Gas comp. shut down due to amine plant upset	unplanned	L.V.		
10/14/08	5:00	5:03	3	0	Acid gas comp. upset	unplanned	A.D.		
10/30/08	19:00	19:07	3	0	Gas comp shut down due to vibration	unplanned	T.S.		

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. **B)** Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. **C)** Planned and unplanned flaring of <300 ppm gas only requires logging. **D)** Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"				Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Nov-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
11/2/08	11:05	11:10	5	0	Amine Plant Upset	UNPLANNED	T.S
11/13/08	12:00	1	2.2	0	Amine Plant Upset	UNPLANNED	A.D
11/22/08	14:29	14:30	2	0	Amine Plant Upset	UNPLANNED	A.D
11/27/08	13:10	13:40	24	0	Lost Power from MOSF	UNPLANNED	T.S

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

RULE 54 PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"						Dec-08	
Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S						PLANNED OR UNPLANNED	OPERATOR INITIALS
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare		
12/23/08	11:30	11:43	43	1	platform shutdown / SCE power outage	UNPLANNED	P/A
12/24/08	12:00	12:30	58	1	platform shutdown / SCE power outage.	UNPLANNED	FS

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Pla

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">Rule 57.B</p>	Description: <p style="text-align: center;">Combustion Contaminants, Fuel Burning Equipment</p>
---	--

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Calculations based on Ventura County APCD approved methods

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:
- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Condition Attachment
Form TVPF46/07-21-03 Page 2 of 2

- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 64.B1	Description: Sulfur Content of Fuels (Gaseous)
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Laboratory analysis conducted annually of Non-PUC quality fuel gas; Determination of Sulfur in a gaseous matrix.

2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3 Please indicate if this compliance determination method is continuous or intermittent:

Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

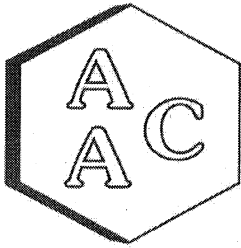
5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Condition Attachment
Form TVPF46/07-21-03 Page 2 of 2

- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)



Atmospheric Analysis & Consulting, Inc.

CLIENT : DCOR L.L.C.
PROJECT NAME : Platform Gilda-Gas Sample
AAC PROJECT NO. : 080516
REPORT DATE : 08/12/2008

On August 08, 2008, Atmospheric Analysis & Consulting, Inc. received one (1) sample for Sulfur Analysis by SCAQMD 307.91. Upon receipt the sample was assigned a unique Laboratory ID number as follows:

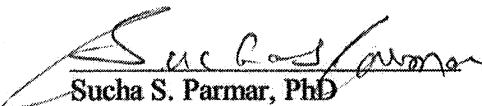
Client ID	Lab No.
Cylinder	080516-34668

SCAQMD 307.91- Up to a 1 mL aliquot of sample is injected into the GC/SCD for analysis following SCAQMD 307.91 as specified in the SOW.

Sample was received pass holding time. No other problems were encountered during receiving, preparation, and/ or analysis of this sample. The test results included in this report meet all requirements of the NELAC Standards and/or AAC SOP# AACI- SCAQMD307.91.

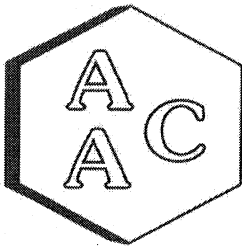
I certify that this data is technically accurate, complete, and in compliance with the terms and conditions of the contract. Release of the data contained in this hardcopy data package and its electronic data deliverable submitted on diskette has been authorized by the Laboratory Director or his designee, as verified by the following signature.

If you have any questions or require further explanation of data results, please contact the undersigned.


Sucha S. Parmar, PhD
Technical Director

This report consists of 5 pages.





Atmospheric Analysis & Consulting, Inc.

LABORATORY ANALYSIS REPORT

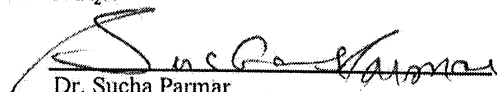
CLIENT **DCOR**
 PROJECT NO. **080516**
 UNITS **PPMV**

SAMPLING DATE **08/08/2008**
 RECEIVING DATE **08/08/2008**
 ANALYSIS DATE **08/08/2008**
 REPORT DATE **08/12/2008**

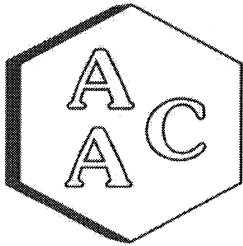
Total Reduced Sulfur Compounds Analysis by ASTM D-5504

Client ID	Cylinder		PQL (RLxDF's)	Reporting Limit
AAC ID	080516-34668			
Analyte	Result	Analysis DF		
H ₂ S	0.04	2.0	0.02	0.01
Carbonyl Sulfide	0.03	2.0	0.02	0.01
SO ₂	<PQL	1.0	0.01	0.01
Methyl Mercaptan	0.04	1.0	0.01	0.01
Ethyl Mercaptan	<PQL	1.0	0.01	0.01
Dimethyl Sulfide	0.09	1.0	0.01	0.01
n-Butyl mercaptan	<PQL	1.0	0.01	0.01
Carbon Disulfide	<PQL	1.0	0.01	0.01
Allyl Sulfide	<PQL	1.0	0.01	0.01
Propyl Sulfide	<PQL	1.0	0.01	0.01
Allyl disulfide	<PQL	1.0	0.01	0.01
Isopropyl Mercaptan	0.04	1.0	0.01	0.01
t-Butyl Mercaptan	<PQL	1.0	0.01	0.01
Propyl Mercaptan	<PQL	1.0	0.01	0.01
Butyl Sulfide	<PQL	1.0	0.01	0.01
Ethyl Methyl Sulfide	<PQL	1.0	0.01	0.01
Thiophene	<PQL	1.0	0.01	0.01
Isobutyl Mercaptan	<PQL	1.0	0.01	0.01
Dimethyl Disulfide	<PQL	1.0	0.01	0.01
Allyl Mercaptan	<PQL	1.0	0.01	0.01
3-Methylthiophene	<PQL	1.0	0.01	0.01
Tetrahydrothiophene	<PQL	1.0	0.01	0.01
Diethyl Sulfide	<PQL	1.0	0.01	0.01
2-Ethylthiophene	<PQL	1.0	0.01	0.01
2,5-Dimethylthiophene	<PQL	1.0	0.01	0.01
Diethyl disulfide	<PQL	1.0	0.01	0.01
Total Unidentified Sulfurs as H₂S	0.05		0.01	0.01
Total Reduced Sulfurs as H₂S		0.24		0.01

All compound's concentrations expressed in terms of H₂S.


 Dr. Sucha Parmar
 Technical Director





Atmospheric Analysis & Consulting, Inc.

Quality Control/Quality Assurance Report

Date Analyzed: 08/08/2008
 Analyst: DN

Instrument ID: SCD#2
 Units: PPMV

I - Method Blank - ASTM D-5504

AAC ID	Analyte	MB Conc.
Method Blank	H2S	ND

II-Laboratory Control Spike & Duplicate - ASTM D-5504

Analyte	Spike Added	LCS Result	LCS Result	LCS % Rec *	LCS % Rec *	% RPD***
H2S	0.050	0.053	0.049	106.0	98.0	7.8

III-Matrix Spike & Duplicate - ASTM D-5504

Sample ID 080516-34668 (10x)

Analyte	Sample Concentration	Spike Added	MS Result	MSD Result	MS % Rec **	MSD % Rec **	% RPD***
H2S	0.000	0.050	0.047	0.047	94	94	0.0

IV - Duplicate Analysis - ASTM D-5504

Sample ID 080516-34668 (10x)

Analyte	Sample Concentration	Duplicate Concentration	Mean	% RPD***
H2S	0.000	0.000	0.000	0.0

* Must be 90-110%

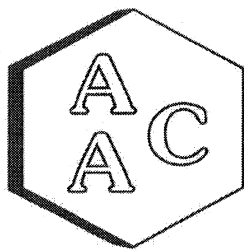
** Must be 85-115%

*** Must be < 10%


 Dr. Sucha Parmar

Technical Director





Atmospheric Analysis & Consulting, Inc.

Quality Control/Quality Assurance Report

Date Analyzed: 8/8/2008
Analyst: DN
Calibration Date: 7/29/2008

Instrument ID: SCD#2
Units: PPMV

Opening Calibration Verification Standards

Analyte	Std. Conc.	Result	%Recovery*
H2S	0.050	0.050	100

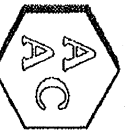
Closing Calibration Verification Standard

Analyte	Std. Conc.	Result	%Recovery*
H2S	0.050	0.050	100

* Must be 90-110%


Dr. Sucha Parmar
Technical Director





ATMOSPHERIC ANALYSIS & CONSULTING, INC.
 1534 Eastman Avenue, Suite A
 Ventura, California 93003
 Phone (805) 650-1642 Fax (805) 650-1644
 E-mail: aaclab@earthlink.net

AAC Project No. 200516

Page 1 of 1

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client Name DCOR LLC		Project Name PLATFORM GUDA - SALES GAS		Send Report:			
Project Mgr (Print Name) CHRISTINE WHITE		Project Number 11		Attn: WHITE			
Sampler's Name (Print Name) CHRISTINE WHITE		Sampler's Signature <i>Christine White</i>		Phone #: 535-2074			
AAC Sample No.	Date Sampled	Time Sampled	Sample Type	Client Sample ID/Description	Type/No. of containers	Analysis Requested	Fax #: 535-2075
34668	8/8/08	11:00AM	gas	cylinders	1	X	Send Invoice to:
							Attn: WHITE
							P.O. #
							Turn Around Time 24-Hr _____ 48-Hr _____
							5 day _____ Normal X
							Other (Specify)
							Special Instructions / remarks:
Relinquished by (Signature) <i>Christine White</i>		Print name: Christine White		Date/Time 8/8/08 2:05pm		Received by (Signature) <i>Thurston Skovs</i>	
Relinquished by (Signature)		Print name:		Date/Time		Received by (Signature)	
						Print Name	

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 64.B2	Description: Sulfur Content of Fuels (Liquid)
---	--

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Records are maintained from diesel fuel supplier certifying the sulfur content of fuel used for the project.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Condition Attachment
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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)



GENERAL PETROLEUM

12/31/08

Letter of Conformance

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and

Delivered to M/V RYAN T, M/V LUKE & M/V PATRICK FROM
01/01/08-12/31/08

was in compliance with South Coast Air Quality Management District
Requirements for Santa Barbara, Ventura and Los Angeles Counties.

The test Results meet ASTM D-4294 and is typical of all CARB Ultra Low Sulfur
Dyed Diesel Fuel sold by General Petroleum. The sulfur content is Guaranteed to
be less than .0015%. (15PPM) The high heat content is typically in the 19,950 to
20,200 BTU per pound range.

Hope Bowles

General Manager
General Petroleum
Oxnard Division
Office (805) 299-1219

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 68	Description: Carbon Monoxide
--	-------------------------------------

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Carbon monoxide (CO) shall not be discharged into the atmosphere in concentrations exceeding 2000 ppm by volume measured on a dry basis at standard conditions. Compliance is achieved by assuming maximum load and calculating emissions using VCAPCD and EPA approved emission factors.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

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Ventura County Air Pollution Control District
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- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 71.1C	Description: Crude Oil Production and Separation
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Produced gas must be controlled at all times and is verified through the daily visual and periodic maintenance of the produced gas collection system on Platform Gilda. Produced gas is either directed to sales, vapor compressor or flare. Compliance with Rule 74.10 ensures that various components are not leaking. The produced gas stream is a fully controlled closed loop system.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

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Ventura County Air Pollution Control District
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On 8/30/08 there was a loss of VRU due to SCE power outage. A breakdown was subsequently filed per Rule 32. All platform production and processing was shut down; there were no excess emissions.

8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)

Ventura County Air Pollution Control District
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 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 71.4.B1 and B3	Description: Petroleum Sumps, Pits, and Well Cellars
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

There are no first stage sumps or well cellars on Platform Gilda. Offshore platforms are equipped with non leaking stuffing boxes, oil is never stored in an open "pit" or cellar.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 74.6	Description: Surface Cleaning and Degreasing
--	---

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Monthly records maintained of quantity of solvent use and purchases for solvents with ROC content of 25 grams per liter or greater. Chemco 33-S has ROC content of 44 grams/liter and is only used when diluted 1:1 with water. No other solvents with ROC content of 25 grams per liter or greater were used during 2008.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

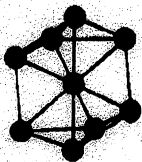
- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District
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Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)



American Research and Testing Inc.

14934 SOUTH FIGUEROA STREET
GARDENA CA 90248
(310) 538-9709 FAX (310) 538-9965
www.americanresearch.com

CLIENT: Flo-Kem, Inc..
19402 Susana Rd.
Rancho Dominguez CA 90221

NUMBER
207-11-095
November 14, 2007

SUBJECT: VOC of Chemco 33-S

REFERENCE:

Tests and charges were authorized by Mr. Kishor Pathak on 11/9/07.

SAMPLE DESCRIPTION:

The Client submitted and identified one container of Chemco 33-S Water-Based Cleaner.

REQUEST:

Determine the VOC of the sample.

METHOD:

VOC of the sample was determined from total volatile content, water content, and density following the methodology specified in EPA Method 24 and CARB Method 310. Volatile content was determined gravimetrically per ASTM D2369. Water was determined by pyridine-free Karl Fischer titration, per ASTM D4017, in a reaction medium designed to handle the high pH of the sample. Density was determined per ASTM D1475, using a calibrated pycnometer. VOC was calculated from these data.

RESULTS:

	Chemco 33-S
Total Volatile Matter (weight percent)	83.75
Water Content (weight percent)	82.14
Density at 25 °C (g/ml)	1.064
VOC, expressed per EPA Method 24 (weight fraction)	0.0161
VOC, expressed per CARB Method 310 (weight percent)	1.61
VOC of material, expressed per SCAQMD Rule 443.1 as grams/liter (pounds/gallon)	17 g/L (0.142 lb/gal)

SIGNED FOR THE COMPANY

by

B. Belmont
Senior Chemist

Rita R. Boggs, Ph.D.
President

CHEMCO PRODUCTS COMPANY
6401 E. Alondra Blvd.

Paramount, CA 90723
Emergency: 800-255-3924

MATERIAL SAFETY DATA SHEET

SECTION I. IDENTIFICATION OF PRODUCT

Name: CHEMCO 33-S
Identity: All Purpose Degreaser MSDS Number: 0041 Date: 8/26/2004 Supersedes: 10/25/2002
TOXICITY: 1 FIRE: 0 REACTIVITY: 0 PROTECTION: B

SECTION II. HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

Name	CAS Number	PEL	TLV	%
2-butoxyethanol	111-76-2	25ppm skin	25ppm skin	5
Sodium Metasilicate	6834-92-0	NE	NE	<5

SECTION III. PHYSICAL/CHEMICAL CHARACTERISTICS

Boiling Point: 212° F	Specific Gravity: 1.068	Vapor Pressure: (mm Hg.): ND	Melting Point: ND
Vapor Density: (Air = 1): 1	Evaporation: (H2O = 1): 1	Water Solubility: Complete	pH @ 77° F: 13.0
			VOCgm/L: 44

Appearance and Odor: Clear yellow-green liquid, cucumber odor

SECTION IV. FIRE AND EXPLOSION HAZARD DATA

Flash Point (TCC): None	% LEL: ND	% UEL: ND
----------------------------	--------------	--------------

DIUTED W/ H₂O 1:1
RESULTING VOC gm/L: 22
Flammable Limits: ND

Extinguishing Media: Small fires: dry chemical, CO2 Big fires: water fog

Special Fire Fighting Procedures: Prevent breathing vapors. Wear SCBA and protective clothing.

Unusual Fire and Explosion: None

SECTION V. HEALTH HAZARD DATA

Route(s) of Entry: INHALATION? Yes EYES? Yes SKIN? Yes INGESTION? Yes

(Acute) Health Hazards:

Eyes: May cause irritation, redness, pain

Skin: Causes skin irritation. Prolonged/repeated contact may cause itching and local redness.

Ingestion: May cause headache, nausea, vomiting, and abdominal distress

Inhalation: May cause irritation of upper respiratory tract

(Chronic) Health Hazards: Prolonged or repeated skin contact may aggravate existing dermatitis

Signs and Symptoms of Exposure:

Eyes: Burning, redness

Skin: May cause irritant reaction on prolonged contact

Ingestion: Abdominal discomfort, nausea, vomiting, and diarrhea

Inhalation: Occasional mild irritation effects to nose and throat may occur

Medical Conditions Generally Aggravated by Exposure: Pre-existing contact site disorders of the skin, liver, kidney. Excessive exposure may cause hemolysis.

Emergency First Aid Procedures:

Eyes: Immediately flush eyes with large amounts of water for about 15 minutes. Hold eyelids apart during the flushing to ensure thorough rinsing.

Skin: Immediately flush all affected areas with large amount of running water for at least 15 minutes. Remove and discard contaminated clothing and shoes. Get medical attention.

Ingestion: Do not induce vomiting. If conscious, give large quantity of water. Do not give anything by mouth to an unconscious person. Obtain medical attention.

Inhalation: Remove to fresh air. If irritation persists, obtain medical attention.

SECTION VI. TOXICITY DATA

Carcinogenicity: NTP? No IARC MONOGRAPHS? No OSHA REGULATED? No

SECTION VII. REACTIVITY DATA

Stability: Stable

Hazardous Polymerization Will Not Occur

Incompatibility (Materials to Avoid): Strong acids, alkalis, oxidizers

Hazardous Decomposition Byproducts: Carbon dioxide and carbon monoxide

SECTION VIII. PRECAUTIONS FOR SAFE HANDLING AND USE

Steps to be Taken in Case Material is Released or Spilled:

Small Spills: Mop up. Slippery on floor.

Large Spills: Contain with dikes and transfer into appropriate containers for reclamation or disposal

Disposal: Meet Federal, State & Local Requirements

Handling and Storage: Store in cool, dry well-ventilated area. Keep container tightly closed when not in use.

Other Precautions: Keep out of reach of children. FOR INDUSTRIAL AND INSTITUTIONAL USE ONLY.

SECTION IX. CONTROL MEASURES

Respiratory Protection: Mist/air purifying respirator

Ventilation: Sufficient to keep PEL from being exceeded

Local Exhaust: Recommended if generating mist or vapors

Mechanical (General): If needed to maintain levels below PEL

Protective Gloves: Rubber, vinyl

Eye Protection: Chemical safety goggles

Other Protective Clothing or Equipment: Long pants, sleeves, apron

Work/Hygienic Practices: The recommendations described in this section are provided as general guidance for minimizing exposure when handling this product. Because use conditions will vary, depending upon customer applications, specific safe handling procedures should be developed by persons knowledgeable of the intended use conditions and equipment.

SECTION X. DOT INFORMATION

NOT REGULATED

SECTION XI. MISCELLANEOUS INFORMATION

SARA 313: 2-butoxyethanol

Notice: All information, recommendations, and suggestions appearing herein concerning this product are based upon data obtained from the manufacturer and/or recognized technical sources; however, manufacturer makes no warranty, representation or guarantee as to the accuracy, sufficiency or completeness of the material set forth herein. It is the user's responsibility to determine the safety, toxicity and suitability of his own use, handling and disposal of the product.

NA - Not Applicable

S - May Be Absorbed Through Intact Skin

ND - No Data Available

Supersedes 10/25/2002

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Condition Attachment
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">Rule 74.10</p>	Description: Components at Crude Oil and Natural Gas Production Processing Facilities
--	--

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Maintain a fugitive emission inspection and maintenance program that is consistent with the requirements of Rule 74.10.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

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Ventura County Air Pollution Control District
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Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)

**VENTURA COUNTY APCD
 RULE 74.10
 COMPONENT LEAK REPORT
 Report for the 1st Quarter of 2008**

FACILITY: DCOR, PLATFORM GILDA

PERMIT#: 1492

Method of
 Inspection:
TVA

Components	Valves	Others	Pumps	Compres.	PRV's
Accessible Inspected:	2,820	18,267	0	3	0
Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A
Total # Leaking:	0	0	0	0	0
% Leaking:	0.00%	0.00%	0.00%	0.00%	0.00%

Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
2 1/2" Valve	Well #S-71	1/3/2008 7:00AM	1/3/2008 7:00AM	4,200	N/A	1/3/2008	0
1/2" Valve	Well #S-15	1/3/2008 7:30AM	1/3/2008 7:30AM	4,800	N/A	1/3/2008	0
3/8" Tube Fitting	Well #S-57	1/3/2008 8:00AM	1/3/2008 8:00AM	30,000	N/A	1/3/2008	0
1/2" Valve	Well #S-54	1/3/2008 8:30AM	1/3/2008 8:30AM	4,650	N/A	1/3/2008	0
3/8" Tube Fitting	Well #S-24	1/3/2008 9:00AM	1/3/2008 9:00AM	5,000	N/A	1/3/2008	0
1/2" Cap	Well #S-28	1/3/2008 9:30AM	1/3/2008 9:30AM	2,800	N/A	1/3/2008	0
2" Choke Valve	Well #S-42	1/3/2008 10:00AM	1/3/2008 10:00AM	50,000	N/A	1/3/2008	0
1/2" Street L	Roots Meter, Gas Line	1/9/2008 7:15AM	1/9/2008 7:15AM	12,000	N/A	1/9/2008	0
1/2" Plug	Gross Separator, Sight Glass	1/9/2008 8:15AM	1/9/2008 8:15AM	1,450	N/A	1/9/2008	0
1/2" Ball Valve	Sales Gas Recorder	1/9/2008 9:15AM	1/9/2008 9:15AM	40,000	N/A	1/9/2008	0

**VENTURA COUNTY APCD
 RULE 74.10
 COMPONENT LEAK REPORT
 Report for the 2nd Quarter of 2008**

FACILITY: <u>DCOR PLATFORM GILDA</u>		PERMIT#: <u>1492</u>					
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	2,820	18,267	0	3	0	
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	
	Total # Leaking:	0	0	0	0	0	
	% Leaking:	0.00%	0.00%	0.00%	0.00%	0.00%	

Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
3/8" Tube Fitting	Well #S-25	5/14/2008 7:00AM	5/14/2008 7:00AM	6,200	N/A	5/14/2008	0
3/8" Tube Fitting	Well #S-57	5/14/2008 7:30AM	5/14/2008 7:30AM	2,000	N/A	5/14/2008	0
1/4" Ball Valve	Well #S-91	5/14/2008 8:00AM	5/14/2008 8:00AM	40,000	N/A	5/14/2008	0
1/2" Cap	Well #S-33	5/14/2008 8:30AM	5/14/2008 8:30AM	6,000	N/A	5/14/2008	0
3/8" Tube Fitting	Well #S-27	5/14/2008 9:00AM	5/14/2008 9:00AM	4,000	N/A	5/14/2008	0
3/8" Tube Fitting	Scrubber P-17	5/14/2008 9:30AM	5/14/2008 9:30AM	50,000	N/A	5/14/2008	0
2" Shut Down Valve	Well #S-54	5/14/2008 10:00AM	5/14/2008 10:00AM	25,000	N/A	5/14/2008	0
3/8" Tube Fitting	Well #S-36	5/14/2008 11:00AM	5/14/2008 11:00AM	1,700	N/A	5/14/2008	0
3/8" Tube Fitting	Sales Gas Meter	5/19/2008 1:00PM	5/19/2008 1:00PM	30,000	N/A	5/19/2008	0

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
Report for the 3rd Quarter of 2008

FACILITY: DCOR, PLATFORM GILDA				PERMIT#: 1492			
Method of Inspection: TVA	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	2,820	18,267	0	3	0	
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	
	Total # Leaking:	0	0	0	0	0	
	% Leaking:	0.00%	0.00%	0.00%	0.00%	0.00%	
Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
2" Valve	Well #S-71	9/29/2008 1:00PM	9/29/2008 1:00PM	30,000	N/A	9/29/2008	0
2" Valve	Well #S-45	9/29/2008 1:30PM	9/29/2008 1:30PM	1,200	N/A	9/29/2008	0
2" Valve	Well #S-87	9/29/2008 2:00PM	9/29/2008 2:00PM	4,150	N/A	9/29/2008	0
2" Shut Down Valve	Well #S-35	9/29/2008 2:30PM	9/29/2008 2:30PM	20,000	N/A	9/29/2008	0
1/2" Cap	Well #S-2	9/29/2008 3:00PM	9/29/2008 3:00PM	10,000	N/A	9/29/2008	0
2" Valve	Well #S-42	9/29/2008 3:30PM	9/29/2008 3:30PM	50,000	N/A	9/29/2008	0
2" Valve	Well #S-28	9/30/2008 9:00AM	9/30/2008 9:00AM	50,000	N/A	9/30/2008	0
2" Valve	Well #S-48	9/30/2008 9:30AM	9/30/2008 9:30AM	5,100	N/A	9/30/2008	0
1" PRD-C	Vessel V-1	9/30/2008 10:00AM	9/30/2008 10:00AM	8,500	N/A	9/30/2008	0
3/4" Pig Trap Door	Gas Sales	9/30/2008 10:30AM	9/30/2008 10:30AM	50,000	N/A	9/30/2008	0

**VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
Report for the 4th Quarter of 2008**

FACILITY: <u>DCOR PLATFORM GILDA</u>		PERMIT#: <u>1492</u>					
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	2,820	18,267	0	3	0	
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	
	Total # Leaking:	5	4	0	0	0	
	% Leaking:	0.18%	0.02%	0.00%	0.00%	0.00%	
Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
Valve	Well #S-71	10/22/2008 1:00PM	10/22/2008 1:00PM	2,200	N/A	10/23/2008	0
Tube Fitting	Well #S-77	10/22/2008 2:00PM	10/22/2008 2:00PM	2,800	N/A	10/23/2008	0
Valve - Ball	Well #S-13	10/22/2008 3:00PM	10/22/2008 3:00PM	40,000	N/A	10/23/2008	0
Valve - Ball	Well #S-17	10/22/2008 4:00PM	10/22/2008 4:00PM	50,000	N/A	10/23/2008	0
90 Degree	Well #S-23	10/22/2008 5:00PM	10/22/2008 5:00PM	N/A	Minor	10/23/2008	0
Tube Fitting	Well #S-79	10/22/2008 6:00PM	10/22/2008 6:00PM	27,000	N/A	10/23/2008	0
Valve - Ball	Well #S-46	10/22/2008 7:00PM	10/22/2008 7:00PM	14,000	N/A	10/23/2008	0
Valve	Well #S-44	10/22/2008 8:00PM	10/22/2008 8:00PM	1,200	N/A	10/23/2008	0
Tube Fitting	Well #S-7	10/22/2008 9:00PM	10/22/2008 9:00PM	6,000	N/A	10/23/2008	0
Cap	Well #S-8	10/24/2008 6:30AM	10/24/2008 6:30AM	1,500	N/A	10/24/2008	0
90 Degree	Well #S-32	10/24/2008 7:00AM	10/24/2008 7:00AM	N/A	Minor	10/24/2008	0
Valve	Well #S-49	10/24/2008 7:30AM	10/24/2008 7:30AM	8,000	N/A	10/24/2008	0
Tube Fitting	VR Comp	10/24/2008 8:00AM	10/24/2008 8:00AM	16,000	N/A	10/24/2008	0
Plug	H.T.M. Fuel Meter	10/24/2008 8:30AM	10/24/2008 8:30AM	50,000	N/A	10/24/2008	0
Valve - Regulator	DOT Gas Line	10/24/2008 9:00AM	10/24/2008 9:00AM	7,000	N/A	10/24/2008	0
PRD-C	Chiller Skid	10/24/2008 9:30AM	10/24/2008 9:30AM	7,800	N/A	10/24/2008	0
Valve - Shut Down	G.C. #2 SDV #19	10/24/2008 10:00AM	10/24/2008 10:00AM	2,280	N/A	10/24/2008	0

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Condition Attachment
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 74.11.1	Description: Large Water Heaters and Small Boilers
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Platform Gilda has no water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than 75,000 BTU/hr and less than or equal to 2,000,000 BTU/hr.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

Jan / 01 / 2008 (MM/DD/YY) to Dec / 31 / 2008 (MM/DD/YY)

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 74.22	Description: Natural Gas Fired Fan - Central Furnaces
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

There are no natural gas fired fan-type furnaces on the platform. Platform Gilda is not subject to this requirement.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 74.1	Description: Abrasive Blasting
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Visible emission evaluation during abrasive blasting operations. Use of California Certified abrasive sands.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">Rule 74.2</p>	Description: <p style="text-align: center;">Architectural Coatings</p>
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Maintain records of all architectural coatings used. Calculate ROC content in grams per liter in accordance to Table of Standards in Rule 74.2. Maintain records of products used, MSDS and or product data sheets.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

- 3 Please indicate if this compliance determination method is continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 74.16	Description: Oilfield Drilling Operations
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

- 1 Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

All drilling operations powered by grid power, or have exemption from grid power.

- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- 3 Please indicate if this compliance determination method is continuous or intermittent:
- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
- 4 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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- 6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

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