



DCOR, LLC

**2008 ANNUAL COMPLIANCE
CERTIFICATION REPORT
for the time period 4/1/08-3/31/09**

PLATFORM GINA

**PART 70
PERMIT TO OPERATE 1491**

Submitted to:

**Ventura County Air Pollution Control District
669 County Square Drive, Second Floor
Ventura, CA 93003**

Submitted by:

**DCOR, LLC
290 Maple Court, Suite 290
Ventura, CA 93003**

1

COMPLIANCE CERTIFICATION FORM

2

SPECIFIC APPLICABLE REQUIREMENTS

3

PERMIT SPECIFIC CONDITIONS

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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

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

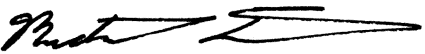
Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

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: 5/14/09
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Time Period Covered by Compliance Certification:

04 / _01_ / _08_ (MM/DD/YY) to _03_ / _31_ / _09_ (MM/DD/YY)

PTO 1491: Platform Gina

Reporting Period: April 1, 2008 through March 31, 2009

There were six breakdown reports filed as a result of power outages that caused the vapor recovery system to shut down (Rule 71.1C).

There were no excess emissions, as shown in the following table:

Excess Emissions

NOx	ROC	CO	SOx	PM	PM10
(lbs)	(lbs)	(lbs)	(lbs)	(lbs)	(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 permit.

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
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	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	None	

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 • 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 maintenance • Rule 74.10 records 	None	None	
74.9N9	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	
ATCM Engine N3	ATCM for Stationary Compression Ignition Engines – OCS	<ul style="list-style-type: none"> • Fuel type records • Fuel use records 	<ul style="list-style-type: none"> • Fuel type records • Fuel use records 	None	None	Not federally enforceable

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
PO1491PC1 - Condition No. 1	Rule 29 General Recordkeeping	<ul style="list-style-type: none"> Annual compliance certification Monthly records of throughput and consumption Annual compliance certification 	<ul style="list-style-type: none"> Monthly records 	None	None	
PO1491PC1 - Condition No. 2	Rule 29 Maximum Number of Oil Wells	Annual compliance certification	None	None	None	
PO1491PC1 - Condition No. 3	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 Annual compliance certification 	Fuel records	None	None	
PO1491PC1 - Condition No. 4	Rules 26 and 29 Crew Boat and Work Boat Emission Limits	<ul style="list-style-type: none"> Diesel fuel consumption for boats servicing Platforms Gina 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	
PO1491PC1 - Condition No. 5	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> 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	
PO1491PC1 - Condition No. 6	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	
PO1491PC1 - Condition No. 7	Rule 29 Boom Boat Fuel Limit	<ul style="list-style-type: none"> Gasoline consumption at boom boats Monthly gasoline consumption records Annual compliance certification 	<ul style="list-style-type: none"> Monthly gasoline consumption at boom boats 	None	None	
PO1491PC1 - Condition No. 8	Rules 23 and 29 Solvent Recordkeeping	<ul style="list-style-type: none"> Maintain a list of exempt solvents Annual compliance certification 	<ul style="list-style-type: none"> Maintain a list of exempt solvents 	None	None	
PO1491PC2 - 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	
PO1491PC2 - 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
PO1491PC3 - 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 	None	None	
PO1491PC3 - 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	

I.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 	<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 	
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 	
57.1	Rule 57.1	<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 	
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 	

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
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 Records of current solvent information 	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 		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 E168-88, 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, 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 	
40CFR61.M	40 CFR Part 61, Subpart M	<ul style="list-style-type: none"> Annual Compliance Certification See 40 CFR Part 61.145 for inspection procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for recordkeeping procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for notification procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for test methods 	

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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
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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:

Apr / 01 / 2008 (MM/DD/YY) to Mar / 31 / 2009 (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 71.1N6	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 the integrity of the roofs and PV 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
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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: 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."

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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 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."
- 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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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.

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: ATCM for Stationary Compression Ignition Engines - OCS	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: PTO 1491 Permit Condition 1 Item 1	Description: Monthly Records of Throughput and 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.

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."
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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?
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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: PTO 1491 Permit Condition 1 Item 2	Description: Maximum Number of Oil Wells: 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.

The platform is permitted with the maximum number of wells, this number cannot be exceeded. This platform has 8 slots with oil well 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."
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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?
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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.

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PTO 1491 Permit Condition 1 Item 3	Maximum Sulfur Content of Diesel Fuel: 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.

Records of sulfur content of diesel fuel maintained from fuel supplier. This diesel fuel is burned in all boats and platform ICEs.

- 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?
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GENERAL PETROLEUM

05/01/09

Letter of Conformance

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and
Delivered to DCOR for the M/V RYAN T, LUKE, PATRICK, &
CAPTAIN T LE between 04/01/2008 – 03/31/2009

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) 278-4501
 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, % ⁴	<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		8873060° 9030 0 68°

By:


 Gerald H. Cunningham
 Fuel Laboratory Manager

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:	Description:
PTO 1491 Permit Condition 1 Item 4	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
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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?
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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:

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Platforms Gina and Gilda Fuel Usage (in Gallons)

Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 75%
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
Jan-09	11,925	2,981	8,944
Feb-09	11,250	2,813	8,438
Mar-09	10,600	2,650	7,950

Supply Boat Fuel Usage

	Gina		Gilda	
	Mains	Aux	Mains	Aux
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
Jan-09	798.3	33.26	2395	99.79
Feb-09	478.9	19.95	1436.6	59.86
Mar-09	439.1	18.3	1317.3	54.89

	Rolling 12 Mo Total	
	Gina	Gilda
	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
	47,335	139,286
	47,410	139,180
	46,902	136,768

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		
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		
Jan-09	0.79	13.28	0.79	0.18	2.41	2.31	39.07	2.33	0.52	7.10		
Feb-09	0.79	13.30	0.79	0.18	2.42	2.31	39.04	2.33	0.52	7.10		
Mar-09	0.78	13.16	0.79	0.18	2.39	2.27	38.36	2.29	0.51	6.98		

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	
Pft Gina	Pft 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 1491 Permit Condition 1 Item 5	Description: Two Crew 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 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:
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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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- 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: PTO 1491 Permit Condition 1 Item 6	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?
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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?
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1491 Permit Condition 1 Item 7	Description: Boom Boat Fuel Limit: 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 fuel consumption at boom boats. 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.
- 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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**PLATFORM GINA and GILDA BOOM BOAT
FUEL USAGE 2007-2009**

	Total Usage	12 Mo 'Running' Total	12 Mo 'Running' Total	
	Gasoline	Gasoline	Gina 50%	Gilda 50%
	gal	gal	gal	gal
Apr-07	0.03	5.58	2.79	2.79
May-07	0.7	6.28	3.14	3.14
Jun-07	0.07	6.31	3.155	3.155
Jul-07	0.04	6.29	3.145	3.145
Aug-07	0	6.29	3.145	3.145
Sep-07	0.14	6.41	3.205	3.205
Oct-07	0	6.36	3.18	3.18
Nov-07	0	6.36	3.18	3.18
Dec-07	0.02	1.0	0.5	0.5
Jan-08	0	1.0	0.5	0.5
Feb-08	0.1	1.1	0.55	0.55
Mar-08	0.01	1.1	0.555	0.555
Apr-08	0	1.1	0.54	0.54
May-08	0	0.4	0.19	0.19
Jun-08	0.25	0.6	0.28	0.28
Jul-08	0.3	0.8	0.41	0.41
Aug-08	3.2	4.0	2.01	2.01
Sep-08	0.25	4.1	2.065	2.065
Oct-08	0.15	4.3	2.14	2.14
Nov-08	0.1	4.4	2.19	2.19
Dec-08	0	4.4	2.18	2.18
Jan-09	0	4.4	2.18	2.18
Feb-09	0.05	4.3	2.155	2.155
Mar-09	0.4	4.7	2.35	2.35
Permit limit per Platform (gallons/year)			500	500

Note: Starting in 6/08, fuel use calculated based on hourly usage and rate of 0.5 gallon/hour
 Boom Boat is physically located on Platform Gilda.
 Fuel use is split 50/50 between Platforms Gina and Gilda.

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1491 Permit Condition 1 Item 8	Description: Solvent Recordkeeping: Rules 23 and 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 the period of 4/1/08 through 3/31/09.

- 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."

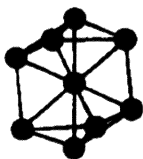
- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates 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?
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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:

Apr / 01 / 2008 (MM/DD/YY) to Mar / 31 / 2009 (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

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:	Description:
PTO 1491 Condition 2 Section 1 & 4	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
 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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- 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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**PLATFORM GINA
FLARE USAGE (MMSCF)**

2007-2009	Pilot SCF	Planned MCF	Unplanned MCF
Apr-07		6.6	0.0
May-07		5.5	20.0
Jun-07		7.3	0.0
Jul-07		8.5	0.0
Aug-07		5.3	0.0
Sep-07		0.0	0.0
Oct-07		1.6	0.0
Nov-07		1913.2	0.0
Dec-07		84.0	0.0
Jan-08		0.0	305.0
Feb-08		0.0	0.0
Mar-08		10.0	0.0
Apr-08		5.8	0.0
May-08		0.0	0.0
Jun-08		0.0	0.0
Jul-08		0.0	0.0
Aug-08		420.0	0.0
Sep-08		979.0	44.0
Oct-08		0.0	184.0
Nov-08		0.0	50.0
Dec-08		170.0	0.0
Jan-09		0.0	43.0
Feb-09		0.0	35.0
Mar-09		216.0	200.0

12 Month 'Rolling' Total	
Pilot MMSCF	Planned MMCF
0.00	0.56
0.00	0.56
0.00	0.56
0.00	0.57
0.00	0.58
0.00	0.07
0.00	0.07
0.00	1.98
0.00	2.06
0.00	2.05
0.00	2.04
0.00	2.04
0.00	2.04
0.00	2.04
0.00	2.03
0.00	2.02
0.00	2.43
0.00	3.41
0.00	3.41
0.00	1.50
0.00	1.58
0.00	1.58
0.00	1.79

<i>Permit Limit Planned Flaring MMCF/YR</i>	16.6
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Notes: Flare has pilot with auto-ignitor.
Pilot volumes are included in total flare volume for each event.

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record 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		September-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS		
9/13/08	0630	0715	15	200	GASLINE SHUT IN AT MANDALAY	UNPLANNED	R.B.		
09/16/08	11:30	14:40	150	0	H-1 GAS TEST	PLANNED	R.B.		
09/17/08	9:15	15:30	405	0	H-1 GAS TEST, UNLOADING.	PLANNED	R.B.		
09/18/08	10:00	14:30	330	0	H-1 GAS TEST, UNLOADING.	PLANNED	A.A.		
09/19/08	10:30	11:45	90	0	H-1 GAS TEST, UNLOADING.	PLANNED	A.A.		
09/21/08	10:48	10:50	1	0	PURGED NITROGEN OUT OF H-1 SCRUBBER MAF-100	PLANNED	J.R.		
09/24/08	06:25	07:25	29	0	SALES GAS LINE SHUT IN AT MANDALAY	UNPLANNED	J.R.		
09/25/08	15:30	16:00	3	0	BLEED OFF H-1 SCRUBBER SYSTEM.	PLANNED	J.R.		

Flaring Requirements: 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 filing a Breakdown Report to APCD C) Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD E) All flaring >48-hrs require an MMS Variance

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record 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		November-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS	
11/25/08	20:00	23:00	50	0	GAS LINE WAS SHUT IN AT MANDALAY	UNPLANNED	JAR	

Flaring Requirements: **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 filing a Breakdown Report to APCD **C)** Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging **D)** Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD **E)** All flaring >48-hrs require an MMS Variance

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not "sweet" or "x"							January-09	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS	
1/10/09	12:30	13:05	28	0	gas pig stuck in line	UNPLANNED	C.Y.	
1/25/09	19:50	20:01	15	0	gas pig stuck in line	UNPLANNED	CY	

Flaring Requirements: **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 filing a Breakdown Report to APCD **C)** Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging **D)** Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD **E)** All flaring >48-hrs require an MMS Variance.

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record 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		February-09	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS	
2/20/09	00:45	04:00	35	0	DUE HIGH CO2 AT MANDALAY	UNPLANNED	JAR	
Flaring Requirements: 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 filing a Breakdown Report to APCD C) Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD E) All flaring >48-hrs require an MMS Variance.								

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not "sweet" or "x"						March-09	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS
3/17/09	21:40	21:50	2	100	MANDALAY'S VALVE SHUT IN	UNPLANNED	JULIO
3/17/09	22:44	22:49	1	100	MANDALAY'S VALVE SHUT IN	UNPLANNED	JULIO
3/31/09	06:30	23:00	216	0	SENT SMART GAS PIG TO MANDALAY	PLANNED	JULIO

Flaring Requirements: **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 filing a Breakdown Report to APCD **C)** Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging **D)** Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD **E)** All flaring >48-hrs require an MMS Variance.

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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: <p style="text-align: center;">PTO 1491 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.

Monthly testing of flare ignition 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."
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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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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: PTO 1491 Condition 3 Sections 1 & 2	Description: New Source Review: Rule 26; and, Stationary Internal Combustion Engines: Rule 74.9
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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
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Time Period Covered by Compliance Certification:

Apr / 01 / 2008 (MM/DD/YY) to Mar / 31 / 2009 (MM/DD/YY)

**PLATFORM GINA USE REPORT
EMERGENCY GENERATOR**

	HOURS		HOURS	
	Non-Emergency	Emergency	Monthly Total	Annual Total
Jan-08	1		1	1
Feb-08	0.8		0.8	1.8
Mar-08	1.6		1.6	3.4
Apr-08	0.9		0.9	4.3
May-08	1.2		1.2	5.5
Jun-08	1.3		1.3	6.8
Jul-08	1.2		1.2	8.0
Aug-08	1.2	3.9	5.1	13.1
Sep-08	2.2		2.2	15.3
Oct-08	0.9		0.9	16.2
Nov-08	2.3		2.3	18.5
Dec-08	1.2		1.2	19.7
Jan-09	1		1	1
Feb-09	0.4		0.4	1.4
Mar-09	2.9	12.5	15.4	16.8

Note: There are no un-permitted emergency generators on Platform Gina

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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 50</p>	Description: <p style="text-align: center;">Visible Emissions</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.

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."

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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:

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Visible Emissions Inspection Record - VCAPCD

Date	Time	Inspected by	Emission Unit	Observations/Corrective Action
22-Apr-08	1318 - 1320	Kirk Cormany	Seaking Crane	No Visible Emissions
22-Apr-08	1326 - 1328	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.

Time Period Covered by Compliance Certification:

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Platform Gina 2008-09 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
10-Apr-08	5	0.6	0.003	0	0.00	0.000
30-Apr-08	0.75	0.6	0.000	0	0.00	0.000
1-Aug-08	400	0.6	0.240	0	0.00	0.000
2-Aug-08	20	0	0.000	10	1.69	0.034
13-Sep-08	15	0	0.000	200	33.77	0.507
16-Sep-08	150	0.6	0.090	0	0.00	0.000
17-Sep-08	405	0.6	0.243	0	0.00	0.000
18-Sep-08	330	0.6	0.198	0	0.00	0.000
19-Sep-08	90	0.6	0.054	0	0.00	0.000
21-Sep-08	1	0.6	0.001	0	0.00	0.000
24-Sep-08	29	0.6	0.017	0	0.00	0.000
25-Sep-08	3	0.6	0.002	0	0.00	0.000
10-Oct-08	62	0.6	0.037	0	0.00	0.000
10-Oct-08	34	0.6	0.020	0	0.00	0.000
16-Oct-08	40	0.6	0.024	0	0.00	0.000
21-Oct-08	48	0.6	0.029	0	0.00	0.000
25-Nov-08	50	0.6	0.030	0	0.00	0.000
10-Dec-08	170	0.6	0.102	0	0.00	0.000
10-Jan-09	28	0.6	0.017	0	0.00	0.000
12-Jan-09	15	0.6	0.009	0	0.00	0.000
20-Feb-09	35	0.6	0.021	0	0.00	0.000
17-Mar-09	2	0	0.000	100	16.89	0.034
17-Mar-09	1	0	0.000	100	16.89	0.017
31-Mar-09	216	0.6	0.130	0	0.00	0.000
TOTAL	2149.8		1.27			0.59
TOTAL SULFUR EMISSIONS					1.86	lb SO2
Annual Limits:						
2,492 MCF/year (per VCAPCD, platform specific limit based on previous 5 years from when rules were written)						
4.41 tons SOx/year (per PTO 1491, Table 4)						

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record 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

DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS
4/10/08	0830	1800	5	0	purging h-1 tubing with nitrogen	PLANNED	J.R.
4/30/08	16:00	16:07	.75	0	Purged sponge #1 after chip change	planned	J.R.

Flaring Requirements: **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 filing a Breakdown Report to APCD **C)** Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging **D)** Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD **E)** All flaring >48-hrs require an MMS Variance

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not "Sweet" or "Sour". Call in a Breakdown Report to VCAPED 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 Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS
					No Flaring in May		

Flaring Requirements: 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 filing a Breakdown Report to APCD C) Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD E) All flaring >48-hrs require an MMS Variance. F) Not over 144 Hrs. in one month.

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not "Sweet gas"
 Call in a Breakdown Report to VCAPCD within 4 hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S

Record all flaring greater than 10 minutes. Record ppm, not "Sweet gas"						June-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS
					No Flaring in June		

Flaring Requirements: 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 filing a Breakdown Report to APCD C) Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD E) All flaring >48-hrs require an MMS Variance

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not sweet or sour. Call in a Breakdown Report to VCAPCD within 48 hours for unplanned flaring lasting longer than 1-hour only if >500ppm H2S						July-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS
					No Flaring in July		

Flaring Requirements: **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 filing a Breakdown Report to APCD **C)** Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging **D)** Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD **E)** All flaring >48-hrs require an MMS Variance. **F)** Not over 144 Hrs. in one month.

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm H₂S if sweet or sour.
 Call in a Breakdown Report to VCAP/GB within 4 hours for unplanned flaring lasting longer than 1 hour only if >300 ppm H₂S

							August-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H ₂ S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS	
8/1/08	04:45	00:30	400	0	SENT SMART GAS PIG	PLANNED	JR	
8/2/08	03:30	04:30	20	10	SENT GAS PIG	PLANNED	JR	

Flaring Requirements: **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 filing a Breakdown Report to APCD **C)** Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging **D)** Planned flaring >300 ppm H₂S for any duration requires a 72-hr written notice to APCD **E)** All flaring >48-hrs require an MMS Variance

PLATFORM GINA FLARE LOG

Reason for Flaring greater than 10 minutes. Record ppm, not "Sweep 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			September-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS			
9/13/08	0630	0715	15	200	GASLINE SHUT IN AT MANDALAY	UNPLANNED	R.B.			
09/16/08	11:30	14:40	150	0	H-1 GAS TEST	PLANNED	R.B.			
09/17/08	9:15	15:30	405	0	H-1 GAS TEST, UNLOADING.	PLANNED	R.B.			
09/18/08	10:00	14:30	330	0	H-1 GAS TEST, UNLOADING.	PLANNED	A.A.			
09/19/08	10:30	11:45	90	0	H-1 GAS TEST, UNLOADING.	PLANNED	A.A.			
09/21/08	10:48	10:50	1	0	PURGED NITROGEN OUT OF H-1 SCRUBBER MAF-100	PLANNED	J.R.			
09/24/08	06:25	07:25	29	0	SALES GAS LINE SHUT IN AT MANDALAY	UNPLANNED	J.R.			
09/25/08	15:30	16:00	3	0	BLEED OFF H-1 SCRUBBER SYSTEM.	PLANNED	J.R.			

Flaring Requirements: 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 filing a Breakdown Report to APCD C) Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD E) All flaring >48-hrs require an MMS Variance

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not "sweet" or "x"					Call in a Breakdown Report to V/GAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S			October-08
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS	
10/10/08	10:50	12:45	62	0	MOSF BACK FLOWING GAS	UNPLANNED	RB	
10/10/08	19:45	21:35	34	0	MOSF WORK IN GAS SYSTEM	UNPLANNED	JR	
10/16/08	21:45	23:25	40	0	Mandalay sales gas line shutin	unplanned	D.B.	
10/21/08	10:25	11:45	48	0	Mandalay sales gas line shutin	Unplained	D.B.	

Flaring Requirements: 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 filing a Breakdown Report to APCD C) Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD E) All flaring >48-hrs require an MMS Variance

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record 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		November-08	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS	
11/25/08	20:00	23:00	50	0	GAS LINE WAS SHUT IN AT MANDALAY	UNPLANNED	JAR	

Flaring Requirements: 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 filing a Breakdown Report to APCD C) Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD E) All flaring >48-hrs require an MMS Variance

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm not sweet or x							March-09	
Call in a Breakdown Report to VCA PCDD 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 Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS	
3/17/09	21:40	21:50	2	100	MANDALAY'S VALVE SHUT IN	UNPLANNED	JULIO	
3/17/09	22:44	22:49	1	100	MANDALAY'S VALVE SHUT IN	UNPLANNED	JULIO	
3/31/09	06:30	23:00	216	0	SENT SMART GAS PIG TO MANDALAY	PLANNED	JULIO	

Flaring Requirements: **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 filing a Breakdown Report to APCD **C)** Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging **D)** Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD **E)** All flaring >48-hrs require an MMS Variance.

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
Rule 57.B	Combustion Contaminants, Fuel Burning Equipment

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:	Description:
Rule 64.B1	Sulfur Content of Fuels (Gaseous)

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 only gas combustion on Platform Gina is flare gas combustion, where no useful energy is produced.

- 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:

Apr / 01 / 2008 (MM/DD/YY) to Mar / 31 / 2009 (MM/DD/YY)

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
Rule 64.B2	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 all ICEs and boats.

- 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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GENERAL PETROLEUM

05/01/09

Letter of Conformance

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and
Delivered to DCOR for the M/V RYAN T, LUKE, PATRICK, &
CAPTAIN T LE between 04/01/2008 – 03/31/2009

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
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Applicable Requirement Part 70 Permit Condition

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

- 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
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:

Apr / 01 / 2008 (MM/DD/YY) to Mar / 31 / 2009 (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:	Description:
Rule 71.1C	Crude Oil Production and Separation

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 Gina. 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

- 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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5/22/08 The entire platform shutdown for an unknown reason. Vapor Recovery was down and a breakdown report was filed per Rule 32. There were no excess emissions during this time as the platform was shut in and there was no venting.

8/30/08 There was a loss of electrical power due to SCE transformer issues at Mandalay. Vapor Recovery was down and a breakdown report was filed per Rule 32. There were no excess emissions as all platform production was shut in.

9/3/08 The platform incoming electrical breaker was tripped due to a down-hole fire water pump failure problem. Vapor Recovery was down and a breakdown report was filed per Rule 32. There was no production at the facility, no venting, and therefore no excess emissions.

11/4/08 The platform lost electrical power, possibly due to a power flicker. Vapor Recovery was down and a breakdown report was filed per Rule 32. There were no excess emissions as all production was shut in and there was no venting.

11/27/08 The platform lost electrical power due to SCE outage. Vapor Recovery was down and a breakdown report was filed per Rule 32. There was no excess emissions as all production was shut in and there was no venting.

1/24/09 The entire platform was automatically shutdown on an H2S alarm. Vapor Recovery was not operational during this time and a breakdown report was filed per Rule 32. There were no excess emissions during this time as the platform was shut in.

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:

Apr / 01 / 2008 (MM/DD/YY) to Mar / 31 / 2009 (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:	Description:
Rule 71.4.B1 and B3	Petroleum Sumps, Pits, and Well Cellars

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 Gina. 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
 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:

Apr / 01 / 2008 (MM/DD/YY) to Mar / 31 / 2009 (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:	Description:
Rule 74.6	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 the period of 4/1/08 through 3/31/09.

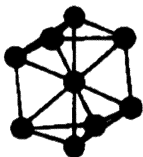
- 2 Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- 3 Please indicate if this compliance determination method is continuous or intermittent:
- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
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Ventura County Air Pollution Control District
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Time Period Covered by Compliance Certification:

Apr / 01 / 2008 (MM/DD/YY) to Mar / 31 / 2009 (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:

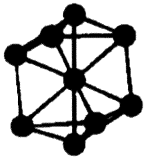
	Chemco 33-S
Total Volatile Matter (weight percent)	83.75
Water Content (weight percent)	82.14
Density at 25 °C (g/ml)	1.064
VOC, expressed per EPA Method 24 (weight fraction)	0.0161
VOC, expressed per CARB Method 310 (weight percent)	1.61
VOC of material, expressed per SCAQMD Rule 443.1 as grams/liter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

SIGNED FOR THE COMPANY

by

B. Belmont
Senior Chemist

Rita R. Boggs, Ph.D.
President



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	Chemco 33-S
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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 Phone No. 1-800-255-3924

MATERIAL SAFETY DATA SHEET

SECTION I. IDENTIFICATION OF PRODUCT

Name: CHEMCO 33-S
Identity: All Purpose Alkaline Degreaser MSDS Number: 0041 Date: 8/04/2008 Supersedes: 11/18/2004
HEALTH: 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 ± 0.005	Vapor Pressure (mm Hg.): ND	Melting Point: ND
Vapor Density (Air = 1): ND	Evaporation (H2O = 1): ND	Water Solubility: Complete	pH @ 77° F: 13.0 ± 0.5
			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	Flammable Limits: ND
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Extinguishing Media: Water fog, foam, carbon dioxide. Cool containers exposed to flames with water from side.

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

Unusual Fire and Explosion: None known

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 and 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 cause skin irritation. This product is not listed as or anticipated to be a potential carcinogen by NTP or OSHA.

Signs and Symptoms of Exposure:

Eyes: Redness, irritation and blurry vision

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 and 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. Get medical attention.

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.

0041

Carcinogenicity: NTP? No

SECTION VI. TOXICITY DATA
IARC No

OSHA REGULATED? No

SECTION VII. REACTIVITY DATA

Stability: Stable

Hazardous Polymerization Will Not Occur

Incompatibility (Materials to Avoid): Strong acids, alkali and 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. Collect spilled material and place in a properly labeled container for later disposal.

Large Spills: Contain with dikes and transfer into appropriate containers for reclamation or disposal. Flush traces with plenty of water.

Disposal: Dispose of to 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: NIOSH approved air purifying, if experiencing respiratory irritation

Ventilation: Normal ventilation.

Local Exhaust: Recommended if generating mist or vapors

Mechanical (General): Recommended if generating mist or vapors

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 Available

NE - Not Established

ND - Not Determined

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

Apr / 01 / 2008 (MM/DD/YY) to Mar / 31 / 2009 (MM/DD/YY)

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

FACILITY: <u>DCOR PLATFORM GINA</u>		PERMIT#: <u>1491</u>				
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's
	Accessible Inspected:	195	1,201	0	1	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)
3/4" Plug	Well H-1	5/19/2008 7:30AM	5/19/2008 7:30AM	50,000	N/A	5/19/2008	0
3/8" Tube Fitting	Well H-5	5/19/2008 8:00AM	5/19/2008 8:00AM	6,000	N/A	5/19/2008	0
1/8" Hatch	Wemco	5/19/2008 8:30AM	5/19/2008 8:30AM	7,800	N/A	5/19/2008	0

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

FACILITY: <u>DCOR PLATFORM GINA</u>		PERMIT#: <u>1491</u>				
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's
	Accessible Inspected:	195	1,201	0	1	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 #H-1	9/29/2008 7:00AM	9/29/2008 7:00AM	16,000	N/A	9/29/2008	0
1/2" Valve	Well #H-5, Orifice Meter	9/29/2008 8:00AM	9/29/2008 8:00AM	50,000	N/A	9/29/2008	0

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

FACILITY: <u>DCOR, PLATFORM GINA</u>				PERMIT#: <u>1491</u>			
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	195	1,201	0	1	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)
PRD-A	Gas Scrubber	10/23/2008 6:30AM	10/23/2008 6:30AM	17,000	N/A	10/23/2008	0
Valve	H2S Sample Point	10/23/2008 7:00AM	10/23/2008 7:00AM	1,400	N/A	10/23/2008	0
PVRV	Waste Water Tank	10/23/2008 8:00AM	10/23/2008 8:00AM	2,800	N/A	10/23/2008	0

**VENTURA COUNTY APCD
 RULE 74.10
 COMPONENT LEAK REPORT
 Report for the 1st Quarter of 2009**

FACILITY: DCOR PLATFORM GINA				PERMIT#: 1491			
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	195	1,201	0	1	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)
1/4" Valve	Sales Gas Meter	3/19/2009 6:30AM	3/19/2009 6:30AM	20,000	N/A	3/19/2009	0
1/2" Paddle Shaft	Wemco	3/19/2009 7:00AM	3/19/2009 7:00AM	15,000	N/A	3/19/2009	0
1" Injector	Amine Skid	3/19/2009 8:00AM	3/19/2009 8:00AM	45,000	N/A	3/19/2009	0

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 74.11.1	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 Gina has no water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than 75,000 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.

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
Rule 74.22	Natural Gas Fired Fan - Central Furnaces

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 Gina 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:	Description:
Rule 74.1	Abrasive Blasting

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. There was no abrasive blasting conducted during the period of 4/1/2008 through 3/31/2009.

- 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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- 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 74.2	Description: Architectural Coatings
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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."
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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."
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
40 CFR Part 61, Subpart M	National Emission Standard for Asbestos

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.

No asbestos demolition or renovation activities took place during the period of 4/1/2008 through 3/31/2009.

- 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
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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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