



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

February 11, 2010

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

RE: Annual Compliance Certification Report
Platform Gilda, PTO 1492

Dear Mr. Duval:

DCOR, LLC, is submitting the enclosed Annual Compliance Verification report for Platform Gilda as required by Part 70 Permit to Operate 01492. This report covers the time period of January 1, 2009, December 31, 2009.

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

Sincerely,

Christine White

Christine White
Environmental Advisor

Enclosure

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



DCOR, LLC

**2009 ANNUAL COMPLIANCE
CERTIFICATION REPORT**

PLATFORM GILDA

**PART 70
PERMIT TO OPERATE 1492**

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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

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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: 
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Time Period Covered by Compliance Certification:

01 / _01_ / _09_ (MM/DD/YY) to _12_ / _31_ / _09_ (MM/DD/YY)

PTO 1492: Platform Gilda

Reporting Period: January 1, 2009 through December 31, 2009

The South Crane diesel fuel throughput limits based on the 12-month rolling average were exceeded in January, February, and May 2009 as documented in the deviation report submitted to VCAPCD and subsequent Notice of Violation 22315.

On 9/23/09 there was a two hour loss of VRU due to SCE shut down called under interruptible power contract provisions. All production and processing was shut down; there were no excess emissions.

On 11/11/09 a major leak was detected and immediately repaired at the open ended line on flare pilot fuel supply line, as documented by Notice of Violation 22316.

Excess emissions from the South Crane have been calculated using Tier 0, g/bhp-hr emission factors as shown below. Because the fuel limit is based on a 12-month rolling average, each monthly limit is dependant on past use. For the period of 2008-2009, the January 2009 limit is 104 hours and 1456 gallons; this value results in 12-month rolling average within the permit limit of 17,200 gallons for January 2009 and all subsequent months. There were 59 operating hours over the limit.

South Crane bhp	325
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South Crane	NOx	ROC	CO	SOx	PM	PM10
Emission Factor Tier 0, gr/bhp-hr	14.06	1.12	8.5	0.005	0.998	0.998
Excess Emissions (tons)	0.297	0.024	0.180	0.000	0.021	0.021

South Crane	Actual Hours	Gallons	12 Mo. Rolling Total Gallons	Hour Limit	Gallon Limit	12 Mo Rolling Total Gallons *	Operating hours over limit
Jan-09	163	2282	18018	104	1456	17192	59
Feb-09	58	812	17794			16968	
Mar-09	18	252	17094			16268	
Apr-09	49	686	16926			16100	
May-09	79	1106	17472			16646	
Jun-09	14	196	16814			15988	
Jul-09	14	196	16296			15470	
Aug-09	12	168	14042			13216	
Sep-09	11	154	11900			11074	
Oct-09	9	126	10346			9520	
Nov-09	9	126	8246			7420	
Dec-09	11	154	6258			5432	

*calculated based on Jan-09 hour limit of 104 hours and 1456 gallons

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 Hours of operation 	<ul style="list-style-type: none"> Records of maintenance Rule 74.10 records 	None	None	
74.9N7	Rule 74.9.D.3	<ul style="list-style-type: none"> Annual compliance certification Hours of operation 	<ul style="list-style-type: none"> Records of operating hours Date, time, duration, and reason for emergency operation Records of engine data 	None	None	
74.9N9	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	
74.15.1N1	Rule 74.15.1.B.1	<ul style="list-style-type: none"> Annual compliance certification Biennial Source Test (NO_x, CO) Routine surveillance to ensure emission unit is functioning w/in its normal operating parameters 	<ul style="list-style-type: none"> Records of source tests Daily records of alternate fuel consumption 	None	<ul style="list-style-type: none"> NO_x-ARB Method 100 CO-ARB Method 100 	

1.c.2. Permit-Specific Conditions

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1492PC1 - Condition No. 1	Rule 29 General Recordkeeping	<ul style="list-style-type: none"> Annual compliance certification Monthly records of throughput and consumption Annual compliance certification 	<ul style="list-style-type: none"> Monthly records 	None	None	
PO1492PC1 - Condition No. 2	Rule 29 Maximum Number of Oil Wells	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO1492PC1 - Condition No. 3	Rule 26 Well Operations - BACT Requirements	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO1492PC1 - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	<ul style="list-style-type: none"> Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery Annual compliance certification 	Fuel records	None	None	
PO1492PC1 - Condition No. 5	Rules 26 and 29 Crew Boat and Work Boat Emission Limits	<ul style="list-style-type: none"> Diesel fuel consumption for boats servicing Platforms Gina and Gilda Monthly calculations of emissions (boats) Annual compliance certification Maintain a log book of hours and days of crew boat operation Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of diesel fuel consumption Monthly calculations of emissions (boats) 	None	None	
PO1492PC1 - Condition No. 6	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> Annual compliance certification Maintain a log book of hours and days of crew boat operation Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of crew boat operation 	None	None	
PO1492PC1 - Condition No. 7	Rule 29 Two Work Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation 	None	None	
PO1492PC1 - Condition No. 8	Rule 26 Boom Boat Fuel Limit	<ul style="list-style-type: none"> Gasoline consumption at Boom Boats Monthly gasoline consumption records Annual compliance certification Maintain a list of exempt solvents Annual compliance certification 	<ul style="list-style-type: none"> Monthly gasoline consumption 	None	None	
PO1492PC1 - Condition No. 9	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	
PO1492PC2 - Condition Nos. 1 and 4	Rule 29 Flare Fuel Consumption	<ul style="list-style-type: none"> Fuel consumption Identify emergency vs. non-emergency usage Annual compliance certification Monthly tests of flare's ignition system Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of fuel consumption 	None	None	
PO1492PC2 - Condition Nos. 2 and 3	Rules 71.1 Flare Ignition System Operation	<ul style="list-style-type: none"> Monthly tests of flare's ignition system Annual compliance certification 	<ul style="list-style-type: none"> Records of ignition system Maintenance records 	None	None	

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

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

1.c.3. General Applicable Requirements

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	<ul style="list-style-type: none"> • Routine surveillance • Visual inspections • Annual compliance certification, including a formal survey • Opacity readings upon request • Notification required for uncorrectable visible emissions 	<ul style="list-style-type: none"> • All occurrences of visible emissions for periods > 3 min 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 	None	None	
74.6	Rule 74.6	<ul style="list-style-type: none"> Annual compliance certification Maintain current solvent information Routine surveillance of solvent cleaning activities Upon request, solvent testing 	<ul style="list-style-type: none"> Records of current solvent information 	None	<ul style="list-style-type: none"> ROC content-EPA Test Method 24 or 24A Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 True vapor pressure or composite partial pressure -ASTM D2879-86 Initial boiling point-ASTM 1078-78 or published source Spray gun active/passive solvent losses-SCAQMD Method (10-3-89) 	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.10	Rule 74.10	<ul style="list-style-type: none"> •Annual compliance certification •Identify leaking components •Inspections every shift or 8 hours at natural gas processing plants •Daily and/or weekly inspections for specified equipment •Quarterly inspections for specified components •Pressure relief valve inspections •Annual update to Operator Management Plan •Notification of major leaks in critical components •Notification of repeat leaks 	<ul style="list-style-type: none"> •Records of leak inspections in inspection log 	None	<ul style="list-style-type: none"> •Gas Leaks - EPA Method 21 •ROC Concentration of Gas Streams - ASTM 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, 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 	

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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: Attachment 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:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 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: <p style="text-align: center;">Attachment 71.1N6</p>	Description: Crude Oil Production and Separation, Compliance with Vapor Recovery
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

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

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

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

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

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

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 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: Attachment 71.4N1	Description: Petroleum Sumps, Pits, Ponds and Well Cellar Compliance
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

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

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

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

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

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

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

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

Time Period Covered by Compliance Certification:

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Applicable Requirement Part 70 Permit Condition

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

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

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

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

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

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

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

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

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

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">Attachment 74.9N9</p>	Description: <p style="text-align: center;">Stationary Internal Combustion Engines</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.

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

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

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

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

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

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">Attachment 74.15.1N1</p>	Description: <p style="text-align: center;">Boilers, Steam Generators, and Process Heaters</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.

Biennial emission source testing to ensure that the uniflux heater is operating within the normal parameters. Results follow.

- 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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Time Period Covered by Compliance Certification:

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AEROS ENVIRONMENTAL, INC.
Summary Of Results

DCOR, LLC
Platform Gilda
4.0 MMBtu/hr Process Heater

Project 092-6276
January 28, 2009
Permit No. 1492

Pollutant	ppm	ppm @ 3% O ₂	lb/hr	lb/MMBtu	Permit Limits
NOx	20.8	19.4	0.04	0.0233	0.14 lb/hr and 30 ppm @ 3% O ₂
	19.5	18.0	0.03	0.0217	
	19.8	17.8	0.04	0.0214	
Mean	20.0	18.4	0.04	0.0221	
CO	235	219	0.24	0.1600	0.32 lb/hr and 400 ppm @ 3% O ₂
	240	222	0.25	0.1623	
	282	254	0.30	0.1855	
Mean	252	232	0.26	0.1693	
Comments: _____					

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">PTO 1492 Permit Condition 1 Item 1</p>	Description: <p style="text-align: center;">Monthly Records of Throughput and Fuel Consumption: Rule 29</p>
--	--

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

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

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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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.

The South Crane diesel fuel throughput limits were exceeded in January, February, and May 2009 as documented in the deviation report submitted to VCAPCD and subsequent Notice of Violation 22315. Fuel meters have been installed and DCOR is closely monitoring fuel use to prevent any future occurrences.

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

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PLATFORM GILDA DIESEL CRANES FUEL USAGE

GILDA	NORTH CRANE		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-08	9	126	6857
Feb-08	49	686	5261
Mar-08	79	1106	5737
Apr-08	143	2002	5471
May-08	42	588	5821
Jun-08	193	2702	8257
Jul-08	203	2842	10931
Aug-08	64	896	11785
Sep-08	64	896	12670
Oct-08	100	1400	13874
Nov-08	49	686	14252
Dec-08	35	490	14420
Jan-09	49	686	14980
Feb-09	34	476	14770
Mar-09	13	182	13846
Apr-09	12	168	12012
May-09	203	2842	14266
Jun-09	22	308	11872
Jul-09	15	210	9240
Aug-09	12	168	8512
Sep-09	8	112	7728
Oct-09	10	140	6468
Nov-09	9	126	5908
Dec-09	11	154	5572
North Crane permit limits	19,250 gal/yr		

GILDA	SOUTH CRANE		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-08	10	140	4397
Feb-08	74	1036	3809
Mar-08	68	952	4663
Apr-08	61	854	4691
May-08	40	560	5013
Jun-08	61	854	5657
Jul-08	51	714	6175
Aug-08	173	2422	8401
Sep-08	164	2296	10682
Oct-08	120	1680	12068
Nov-08	159	2226	14070
Dec-08	153	2142	15876
Jan-09	163	2282	18018
Feb-09	58	812	17794
Mar-09	18	252	17094
Apr-09	49	686	16926
May-09	79	1106	17472
Jun-09	14	196	16814
Jul-09	14	196	16296
Aug-09	12	168	14042
Sep-09	11	154	11900
Oct-09	9	126	10346
Nov-09	9	126	8246
Dec-09	11	154	6258
South Crane permit limits	17,200 gal/yr		

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

**PLATFORM GILDA HEATER
FUEL USAGE 2008-2009
UNIFLUX HEATER**

	Usage		12 Mo 'Rolling' Total
	Natural gas		Natural gas
	mcf	mmscf	mmscf
Jan-08	1221	1.22	16.39
Feb-08	1105	1.11	16.13
Mar-08	1228	1.23	16.22
Apr-08	1157	1.16	16.11
May-08	1238	1.24	16.12
Jun-08	1199	1.20	16.03
Jul-08	1145	1.15	15.97
Aug-08	1189	1.19	15.89
Sep-08	1155	1.16	15.77
Oct-08	1108	1.11	15.63
Nov-08	1110	1.11	15.47
Dec-08	1022	1.02	15.26
Jan-09	974	0.97	14.85
Feb-09	884	0.88	14.51
Mar-09	961	0.96	14.37
Apr-09	1040	1.04	14.18
May-09	937	0.94	13.96
Jun-09	936	0.94	13.66
Jul-09	1005	1.01	13.47
Aug-09	951	0.95	13.27
Sep-09	893	0.89	12.98
Oct-09	666	0.67	12.49
Nov-09	995	1.00	12.37
Dec-09	540	0.54	11.80

Permit limit, mmscf/yr		36.6

Natural Gas Usage Meter 3710

DCOR, LLC

Platform Gilda HTM Gas (Meter 3710)

2009 MCF

Days	January	February	March	April	May	June	July	August	September	October	November	December
	MCF	MCF	MCF	MCF	MCF	MCF	MCF	MCF	MCF	MCF	MCF	MCF
1	31	31	32	33	31	32	34	31	33	3	35	43
2	31	31	32	33	31	31	32	31	33	0	35	38
3	31	31	9	34	31	32	31	31	30	0	33	31
4	31	31	32	33	30	32	31	31	30	0	31	32
5	35	31	32	34	31	32	33	31	30	0	32	34
6	31	31	31	33	32	32	33	31	29	0	34	32
7	31	31	30	35	31	32	31	31	28	0	34	32
8	31	31	32	34	31	32	31	31	30	0	34	31
9	31	31	31	35	31	32	34	31	29	24	32	31
10	31	34	32	35	30	32	31	31	29	31	32	30
11	31	31	31	35	30	33	31	32	29	31	32	31
12	31	31	32	35	30	20	32	32	29	31	32	32
13	31	31	32	35	30	31	34	31	29	31	33	30
14	31	32	32	35	29	35	32	31	29	31	32	0
15	31	31	32	38	29	31	32	31	30	29	34	0
16	31	32	32	35	28	31	33	31	30	29	32	0
17	31	31	32	35	28	31	33	26	30	30	31	0
18	31	31	32	35	29	31	33	17	29	28	34	0
19	33	32	31	35	29	31	33	31	30	27	35	0
20	32	31	31	36	29	31	33	32	31	26	33	0
21	33	32	31	36	31	31	33	33	30	25	33	0
22	32	33	31	35	30	30	33	31	31	24	33	0
23	31	33	32	35	30	31	33	31	35	24	33	0
24	32	34	31	35	30	31	33	30	31	24	34	0
25	31	31	31	35	30	32	33	30	31	24	34	0
26	32	31	33	35	30	32	33	30	31	31	34	0
27	32	32	32	35	30	31	33	30	31	31	34	0
28	31	32	32	35	30	31	33	30	31	31	35	4
29	31	0	32	35	32	32	33	33	30	32	34	45
30	31	0	33	31	33	31	30	33	15	34	31	33
31	31	0	33		31		31	36		35		31
TOTALS	974	884	961	1040	937	936	1005	951	893	666	995	540

Year End Total 10782

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1492 Permit Condition 1 Item 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 48 slots with oilwell completions. Annual Compliance Certification.

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

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

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

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

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

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

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Applicable Requirement Part 70 Permit Condition

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

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

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

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

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

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

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

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

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

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

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

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

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

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 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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Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)



GENERAL PETROLEUM

01/01/10

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, & CAPT. T LE between 01/01/2009 – 12/31/2009 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) 279-4501
 Fax: (303) 279-1528

DATE September 10, 2009
 PROJ. # 009-479
 CTRL # H201/09
 REC'D 08/21/09

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

Sample Number: H201/09-2
 Sample Identification: 2A Diesel Fuel Ryan T 08/19/09 Project #092-6555

	As Assayed	Normalized
ULTIMATE		
Water, %	0.009	0.009
Ash, %	0.005	0.005
Sulfur, %	0.007	0.007
Carbon, %	88.46	86.57
Hydrogen, %	13.7	13.4
Nitrogen, %	<0.01	<0.01
Oxygen, %*	<0.01	0.00
PROXIMATE		
Water, %	0.009	0.009
Ash, %	0.005	0.005
Volatile Matter, %	99.99	99.99
Fixed Carbon, %*	<0.01	0.00
Calorific Value, BTU/gallon	136,504	
Calorific Value, BTU/lb	19,777	
API Gravity	39.6	
Density, g/cc	0.827	
F-Factor, DSCF/MMBTU		9026 @ 60° 9165 @ 68°

By:


 Gerard H. Cunningham
 Fuel Laboratory Manager



Petroleum Testing Services, Inc.

Aeros Environmental, Inc.
18828 Highway 65
Bakersfield, CA 93308

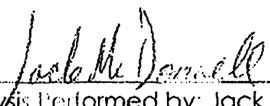
August 21, 2009
Job #: AEI 082109
Page: 1 of 1

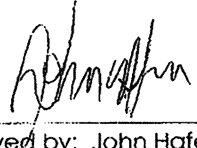
Lisa Marriott-Smith

Laboratory Report

Matrix: Diesel Fuel
Sample Preparation: None, determined as is
Results:

Sample ID	Sulfur, ppm ASTM D7039
DCOR LLC, OCS Crew Boat Alan T, 8/18/09, Sample # 1A, Project # 092-6555A PO#: 20311	10
DCOR LLC, OCS Supply Boat Ryan T, 8/19/09, Sample # 2A, Project # 092-6555B PO#: 20311	5


Analysis Performed by: Jack McDonnell


Report Reviewed by: John Hafen

Peak Petroleum Testing Services, Inc. has prepared this report for the client listed above, and any third parties who might have received this report in error are respectfully asked to return this data to the intended recipient. The data contained on this report may contain privileged client information and may not be used, in any way, by a third party without prior written consent of both the client and Peak Petroleum Testing Services, Inc. Although every effort has been made to obtain the most accurate test data possible, Peak Petroleum Testing Services, Inc. does not guarantee test data results

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

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1492 Permit Condition 1 Item 5	Description: Crew and Work Boat Emission Limits: Rule 29
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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 records of diesel fuel consumption and emission calculations using Ventura County APCD approved emission factors. Fuel consumption is determined through either inline non-resettable meter or onboard daily soundings.

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

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

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

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

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

Platforms Gina and Gilda Fuel Usage (in Gallons)

Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 75%
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
Apr-09	9,725	2,431	7,294
May-09	11,676	2,919	8,757
Jun-09	9,701	2,425	7,276
Jul-09	10,375	2,594	7,781
Aug-09	10,235	2,559	7,676
Sep-09	9,375	2,344	7,031
Oct-09	9,738	2,435	7,304
Nov-09	9,300	2,325	6,975
Dec-09	9,375	2,344	7,031

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

Supply Boat Fuel Usage

	Gina		Gilda	
	Mains	Aux	Mains	Aux
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
Apr-09	599.6	24.98	1798.9	74.95
May-09	408.5	17.02	1225.6	51.07
Jun-09	122.7	5.11	368.1	15.34
Jul-09	112.5	4.68	337.6	14.07
Aug-09	159.7	1.6	479.2	19.97
Sep-09	113.9	4.74	341.6	14.23
Oct-09	89.53	3.73	268.6	11.19
Nov-09	68.48	2.85	205.45	8.56
Dec-09	104.7	4.36	314.1	13.09

	Rolling 12 Mo Total	
	Gina	Gilda
	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
	44,810	132,249
	44,275	129,544
	42,939	126,062
	41,964	121,597
	40,821	119,044
	40,024	115,099
	37,904	110,735
	36,477	106,703
	35,705	103,381

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		
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		
Apr-09	0.74	12.57	0.75	0.17	2.29	2.20	37.10	2.22	0.50	6.74		
May-09	0.73	12.42	0.74	0.17	2.26	2.15	36.34	2.17	0.49	6.61		
Jun-09	0.71	12.04	0.72	0.16	2.19	2.09	35.36	2.11	0.47	6.43		
Jul-09	0.70	11.77	0.70	0.16	2.14	2.02	34.11	2.04	0.46	6.20		
Aug-09	0.68	11.45	0.68	0.15	2.08	1.98	33.39	1.99	0.45	6.07		
Sep-09	0.66	11.23	0.67	0.15	2.04	1.91	32.29	1.93	0.43	5.87		
Oct-09	0.63	10.63	0.63	0.14	1.93	1.84	31.06	1.85	0.42	5.65		
Nov-09	0.61	10.23	0.61	0.14	1.86	1.77	29.93	1.79	0.40	5.44		
Dec-09	0.59	10.02	0.60	0.13	1.82	1.72	29.00	1.73	0.39	5.27		

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	
PK Gina	1.40
PK Gilda	4.2
TPY	71.07
TPY	4.24
TPY	0.95
TPY	12.92

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 1492 Condition1 Item 6</p>	Description: <p style="text-align: center;">Two Crew Boats Shall not be used Simultaneously: Rule 29</p>
--	---

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

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

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

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

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

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

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

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">PTO 1492 Condition1 Item 7</p>	Description: <p style="text-align: center;">Two Work Boats Shall not be used Simultaneously: Rule 29</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.

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

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

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

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

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

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Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1492 Permit Condition 1 Item 8	Description: Boom Boat Fuel Limit: Rule 26
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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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Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

PLATFORM GINA and GILDA BOOM BOAT FUEL USAGE

	Total Usage	12 Mo 'Running' Total	12 Mo 'Running' Total	
	Gasoline	Gasoline	Gina 50%	Gilda 50%
	gal	gal	gal	gal
Jan-08	0.00	1.0	0.50	0.50
Feb-08	0.10	1.1	0.55	0.55
Mar-08	0.01	1.1	0.56	0.56
Apr-08	0.00	1.1	0.54	0.54
May-08	0.00	0.4	0.19	0.19
Jun-08	0.25	0.6	0.28	0.28
Jul-08	0.30	0.8	0.41	0.41
Aug-08	3.20	4.0	2.01	2.01
Sep-08	0.25	4.1	2.07	2.07
Oct-08	0.15	4.3	2.14	2.14
Nov-08	0.10	4.4	2.19	2.19
Dec-08	0.00	4.4	2.18	2.18
Jan-09	0.00	4.4	2.18	2.18
Feb-09	0.05	4.3	2.16	2.16
Mar-09	0.40	4.7	2.35	2.35
Apr-09	1.60	6.3	3.15	3.15
May-09	0.15	6.5	3.23	3.23
Jun-09	3.20	9.4	4.70	4.70
Jul-09	0.00	9.1	4.55	4.55
Aug-09	0.00	5.9	2.95	2.95
Sep-09	0.00	5.7	2.83	2.83
Oct-09	0.20	5.7	2.85	2.85
Nov-09	0.90	6.5	3.25	3.25
Dec-09	1.40	7.9	3.95	3.95
Permit limit per Platform (gallons/year)			500	500

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

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:
PTO 1492 Permit Condition 1 Item 9	Solvent Recordkeeping: Rule 23 and 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 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 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."

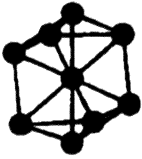
- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 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
 Applicable Requirement or Part 70 Condition Attachment
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PTO 1492 Condition 2 Section 1 & 4	Description: Flare Fuel Consumption: Rule 29
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

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."

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

**PLATFORM GILDA
FLARE USAGE (MMSCF)**

2008-2009	Pilot MCF	Planned MCF	Unplanned MCF
Jan-08	24	13	315
Feb-08	19	8	9
Mar-08	23	0	7
Apr-08	23	0	93
May-08	24	0	63
Jun-08	23	0	7
Jul-08	26	0	38
Aug-08	25	0	131
Sep-08	24	0	126
Oct-08	13	0	224
Nov-08	10	0	33
Dec-08	12	0	101
Jan-09	23	0	158
Feb-09	12	0	0
Mar-09	12	71	1257
Apr-09	12	0	8
May-09	14	0	0
Jun-09	13	0	147
Jul-09	14	0	80
Aug-09	13	21	16
Sep-09	14	0	39
Oct-09	14	0	25
Nov-09	5	1	43
Dec-09	8	2	6

12 Month 'Rolling' Total	
Pilot MMSCF	Planned MMCF
0.6810	1.67
0.6850	1.66
0.6780	1.67
0.6710	1.75
0.6650	1.71
0.6580	1.70
0.6540	1.73
0.6490	1.86
0.6430	1.96
0.6260	2.18
0.6060	2.21
0.5880	1.15
0.5830	0.99
0.5720	0.98
0.5540	2.23
0.5360	2.15
0.5195	2.08
0.5047	2.22
0.4895	2.27
0.4737	2.15
0.4572	2.06
0.4399	1.86
0.4151	1.87
0.3989	1.78

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

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		March-09	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
3/2/09	7:00	7:03	9	0	Platform S/D, firewater pump electrical	UNPLANNED	L.V.	
3/2/09	7:55	8:00	14	0	Platform Start - Up	PLANNED	L.V.	
3/2/09	14:10	14:12	6	0	Amine Plant Bypass Timed Out	UNPLANNED	L.V.	
3/17/09	13:30	0:00	430	0	GC #2 S/D	UNPLANNED	L.V.	
3/18/09	0:00	18:00	750	0	GC #2 S/D	UNPLANNED	L.V.	
3/19/09	9:25	10:45	57	0	Changed Oil Pump & Loader to GC #2	PLANNED	F.S. / R.P.	
3/22/09	20:15	20:50	62	0	GC #2 S/D Due to High BTU's @ MOSF	UNPLANNED	R.T.	

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

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"							Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Jun-09	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS			
6/11/09	7:40	7:45	70	0	Amine Plant Upset	UNPLANNED	F.S./R.T.			
6/11/09	21:50	21:53	5	0	Amine Plant Upset	UNPLANNED	F.S./R.T.			
6/11/09	23:02	23:06	10	0	Amine Plant Upset	UNPLANNED	F.S./R.T.			
6/11/09	13:58	14:02	30	0	Amine Plant Upset	UNPLANNED	F.S./R.T.			
6/12/09	11:55	12:01	16	0	Amine Plant Upset	UNPLANNED	F.S./R.T.			
6/12/09	15:04	15:08	16	0	Amine Plant Upset	UNPLANNED	F.S./R.T.			
<p>A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) 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.</p>										

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"							Aug-09	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
8/2/09	9:45	9:47	1	0	Sent Gas Pig	Planned		
8/5/09	10:30	10:32	2	0	GC-3 S/D	Unplanned		
8/18/09	12:30	12:33	3	0	Platform S/D Electrical Maintenance	Planned		
8/18/09	12:45	12:46	1	0	Platform S/D Electrical Maintenance	Planned		
8/18/09	18:30	18:35	11	0	Platform Start-up after Planned Maintenance	Planned		
8/19/09	12:30	12:33	3	0	Switched from GC-3 to GC-2	Unplanned		
8/22/09	5:50	05"52	3	0	Amine Plant Upset	Unplanned		
8/24/09	14:30	14:32	6	0	Amine Plant Upset	Unplanned		
8/26/09	21:18	21:20	3	0	GC-2 S/D	Unplanned		
8/27/09	22:45	22:46	2	0	GC-2 S/D	Unplanned		
8/28/09	9:00	9:01	1	0	Loaded and Sent Oil Pig	Planned		
8/28/09	10:00	10:01	1	0	Loaded Gas Pig - Bled to Relief Scrubber	Planned		

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

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"							Sep-09	
Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S							PLANNED OR UNPLANNED	OPERATOR INITIALS
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare			
9/2/09	23:46	23:47	2	0	GC-2 S/D	UNPLANNED	LV	
9/6/09	16:47	16:48	2	0	GC-2 S/D	UNPLANNED	JH	
9/12/09	12:15	12:16	2	0	GC-2 S/D	UNPLANNED	JW	
9/18/09	15:58	16:00	2	0	GC-2 S/D	UNPLANNED	TS	
9/23/09	14:15	15:15	26	0	Edison S/D	UNPLANNED	TS	
9/25/09	16:39	16:40	2	0	GC-2 S/D Sending Monthly Gas Pigs	PLANNED	AD	
9/30/09	12:30	12:31	3	0	HTM S/D - Amine Plant S/D	UNPLANNED	LV	

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

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"						Oct-09	
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 Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
10/17/09	21:59	22:03	11	0	S-42 unloading GC#2 S/D	UNPLANNED	R.T
10/18/09	8:00	8:02	6	0	GC#3 S/D HIGH PSI	UNPLANNED	J.H.
10/22/09	7:20	7:22	3	0	GC#3 S/D HIGH PSI S-36 UNLOADING	UNPLANNED	R.T.
10/29/09	19:35	19:36	3	0	GC# 3 S/D LOW PRESSURE	UNPLANNED	J.H.
10/30/09	10:30	10:32	2	0	GC#3 S/D LOW PRESSURE	UNPLANNED	J.H.

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

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"						Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Nov-09	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS		
11/1/09	13:54	13:56	1.5	0	Gas Comp S/D Due to high PSI	UNPLANNED	T.S.		
11/2/09	0:41	0:44	2.3	0	Testing level safety high on seal drum	UNPLANNED	J.H		
11/2/09	13:52	13:54	1.6	0	Gas Comp S/D Due to high PSI	UNPLANNED	T.S.		
11/2/09	16:52	16:54	1.6	0	Gas Comp S/D Due to high PSI	UNPLANNED	T.S.		
11/2/09	19:08	19:10	1.6	0	Gas Comp S/D Due to high PSI	UNPLANNED	T.S.		
11/3/09	10:21	10:23	1.6	0	Gas Comp S/D Due to high PSI	UNPLANNED	T.S.		
11/4/09	11:57	11:59	2	0	Amine Upset	UNPLANNED	T.S.		
11/12/09	1:28	1:30	11	0	Gas Comp S/D Due to high PSI	UNPLANNED	J.W.		
11/18/09	11:30	11:35	14	0	Power Flicker	UNPLANNED	F.S.		
11/20/09	18:35	18:37	1	0	Gas Pig	Planned	J.W.		
11/28/09	13:10	13:12	1.5	0	Gas Comp S/D Due to high PSI	UNPLANNED	J.H		
11/29/09	13:00	13:02	1.5	0	Gas Comp S/D Due to high PSI	UNPLANNED	J.H		
11/30/09	3:03	3:05	1.3	0	Amine Upset	UNPLANNED	J.H		
11/30/09	13:00	13:02	1.5	0	Changing Gas Compressors	UNPLANNED	J.H		

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

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"						Dec-09	
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 Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
12/1/09	1:30	1:02	1.2	0	Amine Plant Upset	UNPLANNED	J.H
12/10/09	1:00	1:02	1.2	0	Amine Plant Upset	UNPLANNED	J.H
12/11/09	16:15	16:17	1.4	0	Low Prs. to W.B. #1 & #2 Hydraulics	UNPLANNED	J.H
12/13/09	17:50	17:53	2.4	0	Amine Plant Bypass Timed Out	UNPLANNED	J.H
12/15/09	9:40	9:43	2.2	0	Bringing on Chiller	Planned	J.H

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) 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: <p style="text-align: center;">PTO 1492 Condition 2 Sections 2 & 3</p>	Description: <p style="text-align: center;">Flare Ignition System: Rule 71.1</p>
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Flare has continuous pilot fed by sweet gas.

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

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

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

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

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

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Applicable Requirement Part 70 Permit Condition

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

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

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

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

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

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

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

**PLATFORM GILDA
PRODUCTION GENERATOR**

	HOURS	
	Non-Emergency	Emergency
Jan-09	1.1	
Feb-09	0.9	
Mar-09	1.3	15.9
Apr-09	0.7	
May-09	1.3	
Jun-09	1.0	
Jul-09	1.5	
Aug-09 *	12.5	
Sep-09	3.6	
Oct-09	1.2	
Nov-09	1.4	
Dec-09	0.9	

HOURS	
Monthly Total	Annual Total
1.1	1.1
0.9	2.0
17.2	19.2
0.7	19.9
1.3	21.2
1.0	22.2
1.5	23.7
12.5	36.2
3.6	39.8
1.2	41.0
1.4	42.4
0.9	43.3

*Used for maintenance shutdown on 8/18/09

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

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

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

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

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

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

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

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

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6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

Visible Emissions Inspection Record - VCAPCD

Date	Time	Inspected by	Emission Unit	Observations/Corrective Action
26-Jan-09	7:32-7:34	Kirk Cormany	HTM Heater	No Visible Emissions
26-Jan-09	8:45-8:47	Kirk Cormany	North Crane	No Visible Emissions
26-Jan-09	14:22-14:24	Kirk Cormany	South Crane	No Visible Emissions
26-Jan-09	11:47-11:49	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:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 54.B.1 and 54.B.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."

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

Platform Gilda 2009 Flaring Events						
Flare Date	MCF flared	Sweet Gas Emission factor lb/MMCF	SO2 Emissions lb	H2S ppm	Sour Gas Emission factor lb/MMCF	SO2 Emissions lb
1/24/09	34	0.6	0.020	0	0.00	0.000
1/24/09	124	0.6	0.074	0	0.00	0.000
3/2/09	9	0.6	0.005	0	0.00	0.000
3/2/09	14	0.6	0.008	0	0.00	0.000
3/2/09	6	0.6	0.004	0	0.00	0.000
3/17/09	430	0.6	0.258	0	0.00	0.000
3/18/09	750	0.6	0.450	0	0.00	0.000
3/19/09	57	0.6	0.034	0	0.00	0.000
3/22/09	62	0.6	0.037	0	0.00	0.000
4/11/09	8	0.6	0.005	0	0.00	0.000
6/11/09	70	0.6	0.042	0	0.00	0.000
6/11/09	5	0.6	0.003	0	0.00	0.000
6/11/09	10	0.6	0.006	0	0.00	0.000
6/11/09	30	0.6	0.018	0	0.00	0.000
6/12/09	16	0.6	0.010	0	0.00	0.000
6/12/09	16	0.6	0.010	0	0.00	0.000
7/21/09	80	0.6	0.048	0	0.00	0.000
8/2/09	1	0.6	0.001	0	0.00	0.000
8/5/09	2	0.6	0.001	0	0.00	0.000
8/18/09	3	0.6	0.002	0	0.00	0.000
8/18/09	1	0.6	0.001	0	0.00	0.000
8/18/09	11	0.6	0.007	0	0.00	0.000
8/19/09	3	0.6	0.002	0	0.00	0.000
8/22/09	3	0.6	0.002	0	0.00	0.000
8/24/09	6	0.6	0.004	0	0.00	0.000
8/26/09	3	0.6	0.002	0	0.00	0.000
8/27/09	2	0.6	0.001	0	0.00	0.000
8/28/09	1	0.6	0.001	0	0.00	0.000
8/28/09	1	0.6	0.001	0	0.00	0.000
9/2/09	2	0.6	0.001	0	0.00	0.000
9/6/09	2	0.6	0.001	0	0.00	0.000
9/12/09	2	0.6	0.001	0	0.00	0.000
9/18/09	2	0.6	0.001	0	0.00	0.000
9/23/09	26	0.6	0.016	0	0.00	0.000
9/25/09	2	0.6	0.001	0	0.00	0.000
9/30/09	3	0.6	0.002	0	0.00	0.000
10/17/09	11	0.6	0.007	0	0.00	0.000
10/18/09	6	0.6	0.004	0	0.00	0.000
10/22/09	3	0.6	0.002	0	0.00	0.000
10/29/09	3	0.6	0.002	0	0.00	0.000
10/30/09	2	0.6	0.001	0	0.00	0.000
11/1/09	1.5	0.6	0.001	0	0.00	0.000
11/2/09	2.3	0.6	0.001	0	0.00	0.000
11/2/09	1.6	0.6	0.001	0	0.00	0.000
11/2/09	1.6	0.6	0.001	0	0.00	0.000
11/2/09	1.6	0.6	0.001	0	0.00	0.000
11/3/09	1.6	0.6	0.001	0	0.00	0.000
11/4/09	2	0.6	0.001	0	0.00	0.000
11/12/09	11	0.6	0.007	0	0.00	0.000
11/18/09	14	0.6	0.008	0	0.00	0.000
11/20/09	1	0.6	0.001	0	0.00	0.000
11/28/09	1.5	0.6	0.001	0	0.00	0.000
11/29/09	1.5	0.6	0.001	0	0.00	0.000
11/30/09	1.3	0.6	0.001	0	0.00	0.000
11/30/09	1.5	0.6	0.001	0	0.00	0.000

Platform Gilda 2009 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
12/1/09	1.2	0.6	0.001	0	0.00	0.000
12/10/09	1.2	0.6	0.001	0	0.00	0.000
12/11/09	1.4	0.6	0.001	0	0.00	0.000
12/13/09	2.4	0.6	0.001	0	0.00	0.000
12/15/09	2.2	0.6	0.001	0	0.00	0.000
TOTAL	1874.4		1.12			0.00
TOTAL SULFUR EMISSIONS					1.12	lb SO2
Annual Limits:						
27,012 MCF/year (per VCAPCD, platform specific limit based on previous 5 years from when rules were written)						
1.80 tons SOx/year (per PTO 1492, Table 4)						

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.					January-09		
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 H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
1/24/09	2:55	3:45	34	0	GC #2 S/D	UNPLANNED	Tony Silva's
1/24/09	7:00	10:00	124	0	GC #2 S/D	UNPLANNED	T.S.

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

Record all flaring > 10 minutes. Record H2S ppm.						Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		March-09	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS		
3/2/09	7:00	7:03	9	0	Platform S/D, firewater pump electrical	UNPLANNED	L.V.		
3/2/09	7:55	8:00	14	0	Platform Start - Up	PLANNED	L.V.		
3/2/09	14:10	14:12	6	0	Amine Plant Bypass Timed Out	UNPLANNED	L.V.		
3/17/09	13:30	0:00	430	0	GC #2 S/D	UNPLANNED	L.V.		
3/18/09	0:00	18:00	750	0	GC #2 S/D	UNPLANNED	L.V.		
3/19/09	9:25	10:45	57	0	Changed Oil Pump & Loader to GC #2	PLANNED	F.S. / R.P.		
3/22/09	20:15	20:50	62	0	GC #2 S/D Due to High BTU's @ MOSF	UNPLANNED	R.T.		

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

Record all flaring greater than 10 minutes. Record H2S ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Apr-09	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
4/11/09	11:55	12:00	8	0	GC #2 S/D	UNPLANNED	PA	

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

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"							Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Jun-09	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS			
6/11/09	7:40	7:45	70	0	Amine Plant Upset	UNPLANNED	F.S./R.T.			
6/11/09	21:50	21:53	5	0	Amine Plant Upset	UNPLANNED	F.S./R.T.			
6/11/09	23:02	23:06	10	0	Amine Plant Upset	UNPLANNED	F.S./R.T.			
6/11/09	13:58	14:02	30	0	Amine Plant Upset	UNPLANNED	F.S./R.T.			
6/12/09	11:55	12:01	16	0	Amine Plant Upset	UNPLANNED	F.S./R.T.			
6/12/09	15:04	15:08	16	0	Amine Plant Upset	UNPLANNED	F.S./R.T.			

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

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"						Aug-09	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
8/2/09	9:45	9:47	1	0	Sent Gas Pig	Planned	
8/5/09	10:30	10:32	2	0	GC-3 S/D	Unplanned	
8/18/09	12:30	12:33	3	0	Platform S/D Electrical Maintenance	Planned	
8/18/09	12:45	12:46	1	0	Platform S/D Electrical Maintenance	Planned	
8/18/09	18:30	18:35	11	0	Platform Start-up after Planned Maintenance	Planned	
8/19/09	12:30	12:33	3	0	Switched from GC-3 to GC-2	Unplanned	
8/22/09	5:50	05:52	3	0	Amine Plant Upset	Unplanned	
8/24/09	14:30	14:32	6	0	Amine Plant Upset	Unplanned	
8/26/09	21:18	21:20	3	0	GC-2 S/D	Unplanned	
8/27/09	22:45	22:46	2	0	GC-2 S/D	Unplanned	
8/28/09	9:00	9:01	1	0	Loaded and Sent Oil Pig	Planned	
8/28/09	10:00	10:01	1	0	Loaded Gas Pig - Bled to Relief Scrubber	Planned	

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

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"							Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		Sep-09
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS		
9/2/09	23:46	23:47	2	0	GC-2 S/D	UNPLANNED	LV		
9/6/09	16:47	16:48	2	0	GC-2 S/D	UNPLANNED	JH		
9/12/09	12:15	12:16	2	0	GC-2 S/D	UNPLANNED	JW		
9/18/09	15:58	16:00	2	0	GC-2 S/D	UNPLANNED	TS		
9/23/09	14:15	15:15	26	0	Edison S/D	UNPLANNED	TS		
9/25/09	16:39	16:40	2	0	GC-2 S/D Sending Monthly Gas Pigs	PLANNED	AD		
9/30/09	12:30	12:31	3	0	HTM S/D - Amine Plant S/D	UNPLANNED	LV		

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

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"						Oct-09	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
10/17/09	21:59	22:03	11	0	S-42 unloading GC#2 S/D	UNPLANNED	R.T
10/18/09	8:00	8:02	6	0	GC#3 S/D HIGH PSI	UNPLANNED	J.H.
10/22/09	7:20	7:22	3	0	GC#3 S/D HIGH PSI S-36 UNLOADING	UNPLANNED	R.T.
10/29/09	19:35	19:36	3	0	GC# 3 S/D LOW PRESSURE	UNPLANNED	J.H.
10/30/09	10:30	10:32	2	0	GC#3 S/D LOW PRESSURE	UNPLANNED	J.H.

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

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"							Nov-09	
Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S							PLANNED OR UNPLANNED	OPERATOR INITIALS
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
11/1/09	13:54	13:56	1.5	0	Gas Comp S/D Due to high PSI	UNPLANNED	T.S.	
11/2/09	0:41	0:44	2.3	0	Testing level safety high on seal drum	UNPLANNED	J.H	
11/2/09	13:52	13:54	1.6	0	Gas Comp S/D Due to high PSI	UNPLANNED	T.S.	
11/2/09	16:52	16:54	1.6	0	Gas Comp S/D Due to high PSI	UNPLANNED	T.S.	
11/2/09	19:08	19:10	1.6	0	Gas Comp S/D Due to high PSI	UNPLANNED	T.S.	
11/3/09	10:21	10:23	1.6	0	Gas Comp S/D Due to high PSI	UNPLANNED	T.S.	
11/4/09	11:57	11:59	2	0	Amine Upset	UNPLANNED	T.S.	
11/12/09	1:28	1:30	11	0	Gas Comp S/D Due to high PSI	UNPLANNED	J.W.	
11/18/09	11:30	11:35	14	0	Power Flicker	UNPLANNED	F.S.	
11/20/09	18:35	18:37	1	0	Gas Pig	Planned	J.W.	
11/28/09	13:10	13:12	1.5	0	Gas Comp S/D Due to high PSI	UNPLANNED	J.H	
11/29/09	13:00	13:02	1.5	0	Gas Comp S/D Due to high PSI	UNPLANNED	J.H	
11/30/09	3:03	3:05	1.3	0	Amine Upset	UNPLANNED	J.H	
11/30/09	13:00	13:02	1.5	0	Changing Gas Compressors	UNPLANNED	J.H	

A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) 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: Rule 57.1	Description: Combustion Contaminants, Fuel Burning Equipment
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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."

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 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: <p style="text-align: center;">Rule 64.B1</p>	Description: <p style="text-align: center;">Sulfur Content of Fuels (Gaseous)</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.

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

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

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

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

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

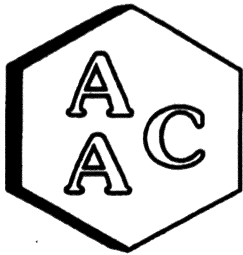
- 5 Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)



Atmospheric Analysis & Consulting, Inc.

CLIENT : DCOR L.L.C.
PROJECT NAME : Platform Gilda
AAC PROJECT NO. : 090921
REPORT DATE : 11/13/2009

On November 13, 2009, Atmospheric Analysis & Consulting, Inc. received one (1) Sample for TRS Analysis by SCAQMD 307.91. Upon receipt the sample was assigned a unique Laboratory ID number as follows:

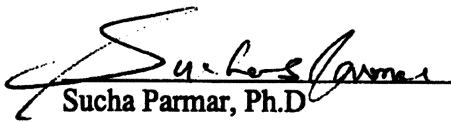
Client ID	Lab No.
Cylinder #1	090921-42035

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

No problems were encountered during receiving, preparation, and/ or analysis of this sample. The test results included in this report meet all requirements of the NELAC Standards and/or AAC SOP# AACI- SCAQMD 307.91.

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

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

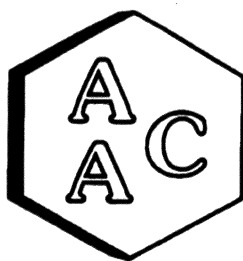

Sucha Parmar, Ph.D.
Technical Director

This report consists of 4 pages.



Page 1





Atmospheric Analysis & Consulting, Inc.

LABORATORY ANALYSIS REPORT

CLIENT
PROJECT NO.
MATRIX
UNITS

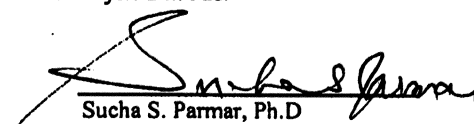
DCOR LLC.
090921
AIR
ppmV

SAMPLING DATE 11/11/2009
RECEIVING DATE 11/12/2009
ANALYSIS DATE 11/12/2009
REPORT DATE 11/13/2009

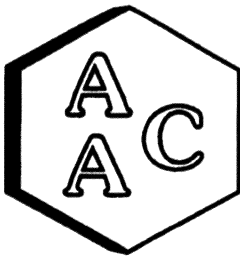
Total Reduced Sulfur Compounds Analysis by SCAQMD 307.91

Client ID	Cylinder #1		SRL (RLxDF's)	Reporting Limit (RL)
AAC ID	090921-42035			
Canister Dil. Fac.	1.0			
Analyte	Result	Analysis Dil. Fac.		
Carbonyl Sulfide	<SRL	1	0.01	0.01
Hydrogen Sulfide	<SRL	1	0.01	0.01
Carbon Disulfide	<SRL	1	0.01	0.01
Sulfur Dioxide	<SRL	1	0.01	0.01
Methyl Mercaptan	<SRL	1	0.01	0.01
Ethyl Mercaptan	<SRL	1	0.01	0.01
Thiophene	0.24	1	0.01	0.01
Dimethyl Sulfide	0.24	1	0.01	0.01
Isopropyl Mercaptan	<SRL	1	0.01	0.01
n-Propyl Mercaptan	<SRL	1	0.01	0.01
tert-Butyl Mercaptan	<SRL	1	0.01	0.01
iso-Butyl Mercaptan	<SRL	1	0.01	0.01
sec-Butyl Mercaptan	<SRL	1	0.01	0.01
n-Butyl Mercaptan	<SRL	1	0.01	0.01
2-Methylthiophene	0.10	1	0.01	0.01
Dimethyl Disulfide	<SRL	1	0.01	0.01
Diethyl Sulfide	<SRL	1	0.01	0.01
2-Ethylthiophene	<SRL	1	0.01	0.01
2,5-Dimethylthiophene	0.02	1	0.01	0.01
Tetrahydrothiophene	<SRL	1	0.01	0.01
Diethyl disulfide	<SRL	1	0.01	0.01
Benzothiophene	<SRL	1	0.01	0.01
Total Unidentified Sulfurs as H ₂ S	0.40			0.01
Total Reduced Sulfurs as H ₂ S	0.60			0.01

All compound's concentrations expressed in terms of H₂S (TRS do not include COS and SO₂)
 Sample Reporting Limit (SRL) is equal to Reporting Limit x Canister Dil. Fac. x Analysis Dil. Fac.


 Sucha S. Parmar, Ph.D
 Technical Director





Atmospheric Analysis & Consulting, Inc.

Quality Control/Quality Assurance Report SCAQMD 307.91

Date Analyzed: 11/12/2009

Analyst: TT

Instrument ID: SCD#2

Int. Calibration Date: 10/9/2009

Opening Calibration Verification Standard

Verification Standard Concentration: 100 ppbV

	Resp. (area)	Result (ppbV)	% Rec *	% RPD ****
Initial	2023064	104.3	104	NA
Duplicate	2054890	106.0	106	1.6
Triplicate	2034456	104.9	105	0.6

Method Blank

Analyte	Result
H2S	ND

Laboratory Control Spike & Duplicate

Analyte	Spike Added	LCS Result	LCSD Result	LCS % Rec *	LCSD % Rec *	% RPD ***
H2S	100.00	101.08	100.96	101.1	101.0	0.1

Matrix Spike & Duplicate

Sample ID 090918-42023

Analyte	Sample Conc.	Spike Added	MS Result	MSD Result	MS % Rec **	MSD % Rec **	% RPD ***
H2S	0.00	50.00	48.41	49.85	96.8	99.7	2.9

Duplicate Analysis

Sample ID 090918-42023

Analyte	Sample Result	Duplicate Result	Mean	% RPD ***
H2S	0	0	0	0.0

Closing Calibration Verification Standard

Verification Standard Concentration: 100 ppbV

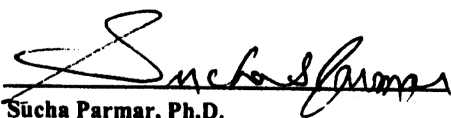
Analyte	Std. Conc.	Result	% Recovery *
H2S	100.00	106.76	106.8

* Must be 90-110%

** Must be 90-110%

*** Must be < 10%

**** must be < 5% RPD from Initial result.


 Sucha Parmar, Ph.D.
 Technical Director





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

AAC Project No. 090921

Page 1 of 1

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client Name DDBR, LLC		Project Name PLATFORM GILDA		Analysis Requested		Send report:		
Project Mgr (Print Name) CHRISTINE WHITE		Project Number ANNUAL SURF ANALYSIS		Type/No. of Containers 307-61		Attn: CHRISTINE WHITE		
Sampler's Name (Print Name) FRANCIS PEREAS		Sampler's Signature <i>[Signature]</i>				Phone#: 805 535-2074		Fax#
AAC Sample No. 42035	Date Sampled 11/10/09	Time Sampled 9:00 am	Sample Type gas	Client Sample ID/Description cylinder #1	Type/No. of Containers 1		Send Invoices to:	
Requisitioned by (Signature): <i>[Signature]</i>		Print Name: Francis Perreas		Date/Time 9:05 11/10/09		Received by (Signature): <i>[Signature]</i>		
Requisitioned by (Signature): <i>[Signature]</i>		Print Name: James Schulte		Date/Time 9:30 11/11/09		Received by (Signature): <i>[Signature]</i>		
Requisitioned by (Signature): <i>[Signature]</i>		Print Name: Christine White		Date/Time 11/12/09 1:00		Received by (Signature): <i>[Signature]</i>		
Special Instructions/remarks:		Turnaround Time 24-Hr _____ 48-Hr _____ 5 Day _____ Normal <input checked="" type="checkbox"/>		Other (Specify)		Print Name Christine White		
Special Instructions/remarks:		P.O. # _____		Attn: CHRISTINE WHITE		Print Name Benjamin Witten		

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 64.B2	Description: Sulfur Content of Fuels (Liquid)
---	--

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

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

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

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

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

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

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

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

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)



GENERAL PETROLEUM

01/01/10

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, & CAPT. T LE between 01/01/2009 – 12/31/2009 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
COMPLIANCE CERTIFICATION PERMIT FORM
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">Rule 68</p>	Description: <p style="text-align: center;">Carbon Monoxide</p>
---	--

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

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

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

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

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

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

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Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 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:
Attachment 71.1.C	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 Gilda. Produced gas is either directed to sales, vapor compressor or flare. Compliance with Rule 74.10 ensures that various components are not leaking. The produced gas stream is a fully controlled closed loop system.

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

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

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

- 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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On 9/23/09 there was a two hour loss of VRU due to SCE shut down called under interruptible power contract provisions. All platform production and processing was shut down; there were no excess emissions.

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 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: Rule 71.4.B1 and B3	Description: 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 Gilda. Offshore platforms are equipped with non leaking stuffing boxes, oil is never stored in an open "pit" or cellar.

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

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

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

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

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

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

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

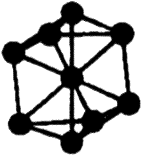
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Ventura County Air Pollution Control District
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Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 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

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
Appearance and Odor: Clear yellow-green liquid, cucumber odor			VOCgm/L: 44 Diluted with H2O 1:1 Resulting VOC gm/L: 22
Flash Point (TCC): None	% LEL: ND	% UEL: ND	Flammable Limits: ND

SECTION IV. FIRE AND EXPLOSION HAZARD DATA

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.

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
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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 74.10	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
 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.

On 11/11/09 a major leak was detected and immediately repaired at the open ended line on flare pilot fuel supply line, as documented by Notice of Violation 22316.

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

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

FACILITY: <u>DCOR PLATFORM GILDA</u>				PERMIT#: <u>1492</u>			
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	2,820	18,267	0	3	0	
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	
	Total # Leaking:	1	1	0	0	0	
	% Leaking:	0.04%	0.01%	0.00%	0.00%	0.00%	
Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
Valve, 2" Valve	Well #S-71	3/19/2009 1:00PM	3/19/2009 1:00PM	3,500	N/A	3/19/2009	0
Other, 1/2" Cap	Well #S-91	3/19/2009 2:00PM	3/19/2009 2:00PM	1,500	N/A	3/19/2009	0
Other, 1/2" Cap	Well #S-87	3/19/2009 3:00PM	3/19/2009 3:00PM	30,000	N/A	3/19/2009	0
Valve, 2" Valve	Well #S-87	3/19/2009 4:00PM	3/19/2009 4:00PM	16,000	N/A	3/19/2009	0
Valve, 2" Shut Down Valve	Well #S-89	3/19/2009 5:00PM	3/19/2009 5:00PM	2,600	N/A	3/19/2009	0
Other, 3/8" Tube Fitting	Well #S-75	3/19/2009 6:00PM	3/19/2009 6:00PM	18,000	N/A	3/19/2009	0
Valve, 2" Casing Wing Valve	Well #S-54	3/19/2009 7:00PM	3/19/2009 7:00PM	6,600	N/A	3/19/2009	0
Other, 1/4" Tee	Well #S-42	3/20/2009 7:00AM	3/20/2009 7:00AM	30,000	N/A	3/20/2009	0
Other, 2" Check Valve	Well #S-42	3/20/2009 8:00AM	3/20/2009 8:00AM	1,600	N/A	3/20/2009	0
Other, 1 1/2" Electrical Connection	Well #S-36	3/20/2009 9:00AM	3/20/2009 9:00AM	28,000	N/A	Critical	Awaiting Repair
Valve, 2" Valve	Well #S-21	3/20/2009 10:00AM	3/20/2009 10:00AM	1,150	N/A	3/20/2009	0
Other, 3/8" Tube Fitting	Well #S-48	3/20/2009 11:00AM	3/20/2009 11:00AM	6,000	N/A	3/20/2009	0
Other, 3/4" Nipple	Vapor Recovery Compressor	3/20/2009 12:00PM	3/20/2009 12:00PM	50,000	N/A	3/20/2009	0
Other, 8" Hatch	Belly Tank	3/20/2009 1:00PM	3/20/2009 1:00PM	2,300	N/A	3/20/2009	0
Valve, 1/4" Valve	HTM Fuel Meter	3/20/2009 2:00PM	3/20/2009 2:00PM	18,000	N/A	3/20/2009	0
Valve, 2" Valve	Well #S-26, CSG SSU	3/20/2009 3:00PM	3/20/2009 3:00PM	48,000	N/A	3/29/2009	0
Valve, 2" Valve	Well #S-2, CSG SSU	3/20/2009 4:00PM	3/20/2009 4:00PM	28,000	N/A	3/20/2009	0

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
Report for the 2nd Quarter of 2009

FACILITY: DCOR. PLATFORM GILDA				PERMIT#: 1492		
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's
	Accessible Inspected:	2,820	18,267	0	3	0
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A
	Total # Leaking:	2	0	0	0	0
	% Leaking:	0.07%	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)
Other, 2" Orifice Valve	Test Separator #2	6/12/2009 8:00AM	6/12/2009 8:00AM	1,400	N/A	6/12/2009	0
Other, 1/2" Cap	Well #39	6/12/2009 8:30AM	6/12/2009 8:30AM	18,000	N/A	6/12/2009	0
Other, 3/8" Tube Fitting	Vapor Recovery Compressor	6/12/2009 9:00AM	6/12/2009 9:00AM	6,400	N/A	6/12/2009	0
Other, 8" Hatch	Waste Oil Tank	6/12/2009 9:30AM	6/12/2009 9:30AM	8,400	N/A	6/12/2009	0
Other, 8" Hatch	Waste Water Tank	6/12/2009 10:00AM	6/12/2009 10:00AM	1,950	N/A	6/12/2009	50
Other, 8" Hatch	Belly Tank	6/12/2009 10:30AM	6/12/2009 10:30AM	1,800	N/A	6/12/2009	100
Other, 2" Nipple	Waste Water Tank	6/15/2009 7:30AM	6/15/2009 7:30AM	5,800	N/A	6/15/2009	0
Valve, 1/2" Ball Valve	Gas Compressor #2	6/15/2009 8:00AM	6/15/2009 8:00AM	1,200	N/A	6/15/2009	0
Other, 1/2" Tube Fitting	Gas Compressor #2	6/15/2009 8:30AM	6/15/2009 8:30AM	3,200	N/A	6/15/2009	0
Valve, 2" Casing Wing Valve	Well #S-54	6/15/2009 9:00AM	6/15/2009 9:00AM	3,400	N/A	6/15/2009	12
Valve, 2 7/8" Shut Down Valve	Well #S-54	6/15/2009 9:30AM	6/15/2009 9:30AM	12,000	N/A	6/15/2009	100
Other, 3/8" Tube Fitting	Well #S-42	6/15/2009 10:00AM	6/15/2009 10:00AM	8,000	N/A	6/15/2009	0
Valve, 6" Ball Valve	Gas Sales Line	6/15/2009 10:30AM	6/15/2009 10:30AM	4,600	N/A	6/16/2009	0
Valve, 2" Shut Down Valve	Well #S-1, CSG SSV	6/15/2009 11:00AM	6/15/2009 11:00AM	30,000	N/A	6/15/2009	0
Valve, 2" Casing Wing Valve	Well #S-42	6/15/2009 11:30AM	6/15/2009 11:30AM	1,200	N/A	6/15/2009	30
Valve, 2" Shut Down Valve	Well #S-26, CSG SSV	6/15/2009 12:00PM	6/15/2009 12:00PM	17,000	N/A	6/19/2009	0

**VENTURA COUNTY APCD
 RULE 74.10
 COMPONENT LEAK REPORT
 Report for the 3rd Quarter of 2009**

FACILITY: <u>DCOR PLATFORM GILDA</u>				PERMIT#: <u>1492</u>		
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's
	Accessible Inspected:	2,820	18,267	0	3	0
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A
	Total # Leaking:	0	1	0	0	0
	% Leaking:	0.00%	0.01%	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)
Other, 3/8" Tube Fitting	Well #S-3	9/21/2009 3:00PM	9/21/2009 3:00PM	2,800	N/A	9/21/2009	0
Other, Clamp	Well #S-26	9/21/2009 3:30PM	9/21/2009 3:30PM	50,000	N/A	9/29/2009	0
Valve, Vent Valve	Well #S-26	9/21/2009 4:00PM	9/21/2009 4:00PM	8,700	N/A	9/21/2009	300
Valve, 2" Orifice Valve	Test Separator #1	9/24/2009 8:00AM	9/24/2009 8:00AM	20,000	N/A	9/24/2009	0
Valve, 6" Orifice Valve	Sales Gas Meter	9/24/2009 8:30AM	9/24/2009 8:30AM	50,000	N/A	9/24/2009	0

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
Report for the 4th Quarter of 2009

FACILITY: <u>DCOR, PLATFORM GILDA</u>		PERMIT#: <u>1492</u>					
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	2,820	18,267	0	3	0	
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	
	Total # Leaking:	0	1	0	0	0	
	% Leaking:	0.00%	0.01%	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)
Other, 1/2" Cap	Well #S-39	10/15/2009 12:00PM	10/15/2009 12:00PM	20,000	N/A	10/15/2009	0
Other, 1/2" Cap	Well #S-61	10/15/2009 12:30PM	10/15/2009 12:30PM	8,000	N/A	10/15/2009	0
Other, 1" Reducer	Well #S-46	10/15/2009 1:00PM	10/15/2009 1:00PM	16,000	N/A	10/15/2009	0
Other, 1/8" Injector	Well #S-26	10/15/2009 1:30PM	10/15/2009 1:30PM	15,500	N/A	10/15/2009	0
Valve, 3" Casing Wing Valve	Well #S-54	10/15/2009 2:00PM	10/15/2009 2:00PM	14,000	N/A	10/15/2009	0
Other, 1/2" Reducer	Well #S-42	10/15/2009 2:30PM	10/15/2009 2:30PM	1,700	N/A	10/15/2009	0
Other, 1/2" Cap	Gas Compressor #3, Level Boot	10/16/2009 7:00AM	10/16/2009 7:00AM	6,800	N/A	10/16/2009	0
Other, 1/4" Cap	Amine Plant, Gas Recorder	10/16/2009 7:30AM	10/16/2009 7:30AM	1,200	N/A	10/16/2009	0
PRV, 1" PRD-C	Gas Shipping Line	10/16/2009 8:00AM	10/16/2009 8:00AM	2,500	N/A	10/16/2009	0
Other, 3/8" Tube Fitting	Sales Gas Recorder	10/16/2009 8:30AM	10/16/2009 8:30AM	3,200	N/A	10/16/2009	0
Valve, 6" Orifice Valve	Sales Gas Meter, Seal Bar Gasket	10/16/2009 9:00AM	10/16/2009 9:00AM	1,600	N/A	10/16/2009	0
Other, 3/8" Tube Fitting	Test Trap #3, Gas Recorder	10/16/2009 9:30AM	10/16/2009 9:30AM	1,800	N/A	10/16/2009	0
Other, 24" Cameron Clamp	Well #S-26, Well Head Clamp	10/16/2009 10:00AM	10/16/2009 10:00AM	4,900	N/A	10/19/2009	0
Valve, 2 1/2" Casing Wing Valve	Well #S-36	11/11/2009 6:30AM	11/11/2009 6:30AM	1,100	N/A	11/11/2009	0
Other, 1/4" OEL	Flare Ignitor	11/11/2009 7:00AM	11/11/2009 7:00AM	37,000	N/A	11/11/2009	0

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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 74.11.1</p>	Description: <p style="text-align: center;">Large Water Heaters and Small Boilers</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.

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

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

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

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

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

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

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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 74.22</p>	Description: <p style="text-align: center;">Natural Gas Fired Fan - Central Furnaces</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.

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

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

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

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

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

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

5

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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 74.1</p>	Description: <p style="text-align: center;">Abrasive Blasting</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.

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

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

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

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

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

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

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6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

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Applicable Requirement Part 70 Permit Condition

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

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

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

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

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

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

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

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

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Applicable Requirement Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: <p style="text-align: center;">Rule 74.16</p>	Description: <p style="text-align: center;">Oilfield Drilling Operations</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.

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

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

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

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

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

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

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Applicable Requirement or Part 70 Condition Attachment
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6 Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

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

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

Time Period Covered by Compliance Certification:

Jan / 01 / 2009 (MM/DD/YY) to Dec / 31 / 2009 (MM/DD/YY)

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