



**DCOR, LLC**

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**2009 ANNUAL COMPLIANCE  
CERTIFICATION REPORT  
for the time period 4/1/2009-3/31/2010**

**PLATFORM GINA**

**PART 70  
PERMIT TO OPERATE 1491**

**Submitted to:**

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

**Submitted by:**

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

RECEIVED  
VENTURA COUNTY  
10 MAY 17 PM 12:52  
A.P.C.D.

**1**

**COMPLIANCE CERTIFICATION FORM**

**2**

**SPECIFIC APPLICABLE REQUIREMENTS**

**3**

**PERMIT SPECIFIC CONDITIONS**

**4**

**GENERAL APPLICABLE REQUIREMENTS**

**5**

**GENERAL REQUIREMENTS FOR SHORT  
TERM ACTIVITIES**

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Ventura County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
 Cover Sheet  
 Form TVPF45/07-21-03 Page 2 of 2

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

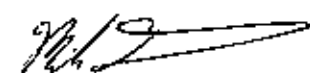
Mr. Gerardo Rios, Chief  
 Permits Office (AIR-3)  
 Office of Air Division  
 EPA Region IX  
 75 Hawthorne Street  
 San Francisco, CA 94105

**Confidentiality**

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

**Certification by Responsible Official**

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

Signature and Title of Responsible Official: <b>Michael Finch</b>  <div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;">             Title: <b>Vice President, ES&amp;RC</b> </div> <div style="text-align: center;">           Date:  <i>5/14/2010</i> </div> </div>
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Time Period Covered by Compliance Certification:  <p style="text-align: center;">_04_ / _01_ / _2009_ (MM/DD/YY) to _03_ / _31_ / _2010_ (MM/DD/YY)</p>
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**PTO 1491: Platform Glna**

Reporting Period: April 1, 2009 through March 31, 2010

There were three breakdown reports (6/5/09, 8/20/09, and 9/23/09) filed as a result of power outages that caused the vapor recovery system to shut down (Rule 71.1C).

Total excess emissions are shown in the following table:

**Excess Emissions**

<b>NOx</b>	<b>ROC</b>	<b>CO</b>	<b>SOx</b>	<b>PM</b>	<b>PM10</b>
<b>(lbs)</b>	<b>(lbs)</b>	<b>(lbs)</b>	<b>(lbs)</b>	<b>(lbs)</b>	<b>(lbs)</b>
0	0.0053	0	0	0	0

## 1.c. PERIODIC MONITORING SUMMARY

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

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

### 1.c.1. Specific Applicable Requirements

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.1N1	Rules 71.1.B.1.a, 74.10	<ul style="list-style-type: none"> <li>• Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable</li> <li>• Verbal notice of maintenance activities</li> <li>• Rule 74.10 inspections</li> <li>• Annual compliance certification including verification that tanks are equipped with a vapor recovery system</li> </ul>	<ul style="list-style-type: none"> <li>• Records of quarterly inspections and tank maintenance activities</li> <li>• Rule 74.10 records</li> </ul>	None	None	
71.1N6	Rules 71.1.B.3, 71.1.D.1.e, 74.10	<ul style="list-style-type: none"> <li>• Annual compliance certification including verification of the integrity of the roof and pressure-vacuum relief valve</li> <li>• Rule 74.10 inspections</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• Records to show integrity of roof and P.V. valves for tanks not permanently located at facility</li> <li>• Rule 74.10 records</li> </ul>	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"> <li>• Verbal notice of maintenance operations</li> <li>• Rule 74.10 inspections</li> <li>• Annual compliance certification including verifying the integrity of the cover</li> </ul>	<ul style="list-style-type: none"> <li>• Records of maintenance</li> <li>• Rule 74.10 records</li> </ul>	None	None	
74.9N9	Rule 74.9.D.9	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Routine surveillance to ensure diesel-fired engine is used to power cranes and welding equipment only</li> </ul>	<ul style="list-style-type: none"> <li>• Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location</li> <li>• Fuel type records</li> <li>• Fuel use records</li> </ul>	None	None	
ATCM Engine N3	ATCM for Stationary Compression Ignition Engines – OCS	<ul style="list-style-type: none"> <li>• Fuel type records</li> <li>• Fuel use records</li> </ul>	<ul style="list-style-type: none"> <li>• Fuel type records</li> <li>• Fuel use records</li> </ul>	None	None	Not federally enforceable

### 1.c.2. Permit-Specific Conditions

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1491PC1 - Condition No. 1	Rule 29 General Recordkeeping	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Monthly records of throughput and consumption</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records</li> </ul>	None	None	
PO1491PC1 - Condition No. 2	Rule 29 Maximum Number of Oil Wells	Annual compliance certification	None	None	None	
PO1491PC1 - Condition No. 3	Rule 29 Maximum Sulfur Content of Diesel Fuel	<ul style="list-style-type: none"> <li>Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery</li> </ul>	Fuel records	None	None	
PO1491PC1 - Condition No. 4	Rules 26 and 29 Crew Boat and Work Boat Emission Limits	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Diesel fuel consumption for boats servicing Platforms Cina and Gilda</li> <li>Monthly calculations of emissions (boats)</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of diesel fuel consumption</li> <li>Monthly calculations of emissions (boats)</li> </ul>	None	None	
PO1491PC1 - Condition No. 5	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Maintain a log book of hours and days of crew boat operation</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of crew boat operation</li> </ul>	None	None	
PO1491PC1 - Condition No. 6	Rule 29 Two Work Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of work boat operation</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of work boat operation</li> </ul>	None	None	
PO1491PC1 - Condition No. 7	Rule 29 Boom Boat Fuel Limit	<ul style="list-style-type: none"> <li>Gasoline consumption at boom boats</li> <li>Monthly gasoline consumption records</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly gasoline consumption at boom boats</li> </ul>	None	None	
PO1491PC1 - Condition No. 8	Rules 23 and 29 Solvent Recordkeeping	<ul style="list-style-type: none"> <li>Maintain a list of exempt solvents</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a list of exempt solvents</li> </ul>	None	None	
PO1491PC1 - Condition Nos. 1 and 4	Rule 29 Flare Fuel Consumption	<ul style="list-style-type: none"> <li>Fuel consumption</li> <li>Identify emergency vs. non-emergency usage</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of fuel consumption</li> </ul>	None	None	
PO1491PC2 - Condition Nos. 2 and 3	Rules 71.1 Flare Ignition System Operation	<ul style="list-style-type: none"> <li>Monthly tests of flare's ignition system</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Records of ignition system</li> <li>Maintenance records</li> </ul>	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
PO149IPC3 - Condition No. 1	Rules 26 and 74.9 200 hours per year backup utility generator operation	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Monthly records of backup utility generator hours of operation</li> </ul>	<ul style="list-style-type: none"> <li>Hours of operation log (non-resettable meter) differentiating non-emergency use and emergency use</li> <li>Monthly and twelve month rolling records of hours of operation</li> </ul>	None	None	
PO149IPC3 - Condition No. 2	Rule 74.9 200 hours per year / emergency use exemptions	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Recordkeeping</li> </ul>	<ul style="list-style-type: none"> <li>Hours of operation log (non-resettable meter)</li> <li>Monthly and twelve month rolling records of hours of operation</li> </ul>	None	None	



### 1.e.3. General Applicable Requirements

The General Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 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"> <li>• Routine surveillance</li> <li>• Visual inspections</li> <li>• Annual compliance certification, including a formal survey</li> <li>• Opacity readings upon request</li> <li>• Notification required for uncorrectable visible emissions</li> </ul>	<ul style="list-style-type: none"> <li>• All occurrences of visible emissions for periods &gt; 3min in any one hour</li> <li>• Annual formal survey of all emissions units</li> </ul>	None	<ul style="list-style-type: none"> <li>• Opacity - EPA Method 9</li> </ul>	
54.B.1 (OCS)	Rule 54.B.1	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Identify planned vs. unplanned flaring event</li> <li>• Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event</li> <li>• Upon request, source test for sulfur compounds at point of discharge</li> </ul>	<ul style="list-style-type: none"> <li>• Representative fuel analysis or exhaust analysis and compliance demonstration</li> <li>• Flare records</li> </ul>	None	<ul style="list-style-type: none"> <li>• Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate</li> </ul>	
54.B.2 (OCS)	Rule 54.B.2	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Identify planned vs. unplanned flaring event</li> <li>• Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event</li> <li>• Determine ground or sea level concentrations of SO<sub>2</sub> upon request</li> <li>• Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>• Representative fuel analysis or exhaust analysis and modeling data or other compliance demonstration</li> <li>• Flare records</li> </ul>	None	<ul style="list-style-type: none"> <li>• SO<sub>2</sub> - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H<sub>2</sub>S and SO<sub>2</sub></li> </ul>	
57.1	Rule 57.1	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> </ul>	None	None	None	<ul style="list-style-type: none"> <li>• Not required based on District analysis</li> </ul>
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• None for PUC-quality gas</li> <li>• Annual test for non PUC-quality gas (submit with annual compliance certification)</li> </ul>	<ul style="list-style-type: none"> <li>• Annual fuel gas analysis for non PUC-quality gas</li> </ul>	None	<ul style="list-style-type: none"> <li>• SCAQMD Method 307-94</li> </ul>	
64.B.2	Rule 64.B.2	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)</li> </ul>	<ul style="list-style-type: none"> <li>• Fuel supplier's certification, or fuel test per each delivery</li> </ul>	None	<ul style="list-style-type: none"> <li>• ASTM Method D4294-83 or D2622-87</li> </ul>	

### 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"> <li>Annual compliance certification</li> <li>Rule 74.10 inspections</li> <li>Visual inspection to ensure collection system is closed</li> <li>Quarterly inspection of flare to ensure proper operation</li> </ul>	<ul style="list-style-type: none"> <li>Records of inspections of flare</li> <li>Rule 74.10 records</li> </ul>	None	None	<ul style="list-style-type: none"> <li>Compliance with Rule 74.10 ensures compliance with the gas collection system's maintenance requirements</li> </ul>
71.4.B.1	Rule 71.4.B.1	<ul style="list-style-type: none"> <li>Annual compliance certification to ensure there are no first stage surps</li> </ul>	None	None	None	
71.4.B.3	Rule 71.4.B.3	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Routine surveillance and visual inspections of well cellars</li> </ul>	<ul style="list-style-type: none"> <li>Records of maintenance or well workover activity during periods of crude oil storage</li> </ul>	None	None	
74.6	Rule 74.6	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Maintain current solvent information</li> <li>Routine surveillance of solvent cleaning activities</li> <li>Upon request, solvent testing</li> </ul>	<ul style="list-style-type: none"> <li>Records of current solvent information</li> </ul>	None	<ul style="list-style-type: none"> <li>ROC consent-EPA Test Method 24 or 24A</li> <li>Identity of solvent components-ASTM E168-87, ASTM E169-87, or ASTM E260-85</li> <li>True vapor pressure or composite partial pressure-ASTM D2879-86</li> <li>Initial boiling point-ASTM 1078-78 or published source</li> <li>Spray gun active/passive solvent losses-SCAQMD Method (10-3-89)</li> </ul>	

### 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"> <li>Annual compliance certification</li> <li>Identify leaking components</li> <li>Inspections every shift or 8 hours at natural gas processing plants</li> <li>Daily and/or weekly inspections for specified equipment</li> <li>Quarterly inspections for specified components</li> <li>Pressure relief valve inspections</li> <li>Annual update to Operator Management Plan</li> <li>Notification of major leaks in critical components</li> <li>Notification of repeat leaks</li> </ul>	<ul style="list-style-type: none"> <li>Records of leak inspections in inspection log</li> </ul>	None	<ul style="list-style-type: none"> <li>Gas Leaks - EPA Method 21</li> <li>RCC Concentration of Gas Streams - ASTM E168-88, ASTM E169-87, or ASTM E260-85</li> <li>Weight percentage of evaporated compounds of liquids - ASTM Method D 86-82</li> <li>API Gravity - ASTM Method D287</li> </ul>	
74.11.1	Rule 74.11.1	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Maintain identification records of large water heaters and small boilers</li> </ul>	<ul style="list-style-type: none"> <li>Records of current information of large water heaters and small boilers</li> </ul>	None	None	<ul style="list-style-type: none"> <li>Rule only applies to future installation of large water heaters and small boilers</li> </ul>
74.22	Rule 74.22	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Maintain furnace identification records</li> </ul>	<ul style="list-style-type: none"> <li>Records of current furnace information</li> </ul>	None	None	<ul style="list-style-type: none"> <li>Rule only applies to future installation of natural gas-fired, fan-type furnaces</li> </ul>

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

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Routine surveillance and visual inspections of abrasive blasting operation</li> <li>Abrasive blasting records</li> <li>Annual compliance certification</li> <li>Routine surveillance</li> <li>Maintain VOC records of coatings used</li> </ul>	<ul style="list-style-type: none"> <li>Abrasive blasting records</li> <li>Maintain VOC records of coatings used</li> </ul>	None	<ul style="list-style-type: none"> <li>Visible emission evaluation-Section 92400 of CCR</li> </ul>	
74.2	Rule 74.2	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Routine surveillance</li> <li>Maintain VOC records of coatings used</li> </ul>	<ul style="list-style-type: none"> <li>Maintain VOC records of coatings used</li> </ul>	None	<ul style="list-style-type: none"> <li>VOC content-EPA Method 24, CARB Method 432</li> <li>Acid content-ASTM Method D 1613-85,</li> <li>Metal content-SCAQMD Method 311-91</li> </ul>	
74.16	Rule 74.16	<ul style="list-style-type: none"> <li>Annual compliance certification to ensure grid power being used, and/or</li> <li>Annual compliance certification to ensure drilling engine has a valid APCD Permit to Operate, and meets NOx limits, or</li> <li>Maintain cost analysis documentation as verification to grid power exemption, if applicable</li> <li>Annual source tests (NO<sub>x</sub>) or engine manufacturer certification</li> </ul>	<ul style="list-style-type: none"> <li>Records of source tests or engine manufacturer certification</li> <li>Records of cost analysis documentation</li> </ul>	None	<ul style="list-style-type: none"> <li>NO<sub>x</sub>-ARB Method 100</li> </ul>	
40CFR61.M	40 CFR Part 61, Subpart M	<ul style="list-style-type: none"> <li>Annual Compliance Certification</li> <li>See 40 CFR Part 61.145 for inspection procedures</li> </ul>	<ul style="list-style-type: none"> <li>See 40 CFR Part 61.145 for recordkeeping procedures</li> </ul>	<ul style="list-style-type: none"> <li>See 40 CFR Part 61.145 for notification procedures</li> </ul>	<ul style="list-style-type: none"> <li>See 40 CFR Part 61.145 for test methods</li> </ul>	

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

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

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

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

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

Ventura County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**  
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:

Apr / 01 / 2009 (MM/DD/YY) to Mar / 31 / 2010 (MM/DD/YY)

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

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
Rule 71.1N6	Crude Oil Production and Separation, Compliance with Vapor Recovery

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

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

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

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

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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:

Apr / 01 / 2009 (MM/DD/YY) to Mar / 31 / 2010 (MM/DD/YY)



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

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
71.4N1	Petroleum Sumps, Pits, Ponds and Well Cellar Compliance

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

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

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

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

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

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**Applicable Requirement Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
Rule 74.9N9	Stationary Internal Combustion Engines

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

Citation, including Attachment Number and/or Permit Condition Number:  ATCM for Stationary Compression Ignition Engines - OCS	Description:  Stationary Internal Combustion Engines
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

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

- 2  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- 3 Please indicate if this compliance determination method is continuous or intermittent:
- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
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**Applicable Requirement Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  <p style="text-align: center;">PTO 1491 Permit Condition 1 Item 1</p>	Description:  <p style="text-align: center;">Monthly Records of Throughput and Fuel Consumption: 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.

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

Time Period Covered by Compliance Certification:

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**PLATFORM GINA DIESEL CRANE FUEL USAGE**

GINA	CRANE		
	Hrs.	Gal.	12 Mo. Rolling Total Gal
Apr-08	55	247	1,810
May-08	171	1,023	2,769
Jun-08	14	87	2,741
Jul-08	10	52	2,735
Aug-08	16	103	2,732
Sep-08	15	86	2,745
Oct-08	12	99	2,594
Nov-08	12	86	1,994
Dec-08	9	48	1,995
Jan-09	23	132	2,083
Feb-09	94	343	2,353
Mar-09	15	220	2,526
Apr-09	14	84	2,363
May-09	14	93	1,433
Jun-09	12	86	1,432
Jul-09	17	117	1,497
Aug-09	25	122	1,516
Sep-09	18	122	1,552
Oct-09	14	106	1,559
Nov-09	10	99	1,572
Dec-09	9	52	1,576
Jan-10	11	72	1,516
Feb-10	12	67	1,240
Mar-10	19	115	1,136
Crane permit limits		2,870 gal/yr	

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**Applicable Requirement Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PTO 1491 Permit Condition 1 Item 2	Maximum Number of Oil Wells: Rule 29

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

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

The platform is permitted with the maximum number of wells, this number cannot be exceeded. This platform has 8 slots with oil well completions. Annual Compliance Certification.

- 2  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- 3 Please indicate if this compliance determination method is continuous or intermittent:
- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
- 4  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
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- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
- 8 If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

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**Applicable Requirement Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PTO 1491 Permit Condition 1 Item 3	Maximum Sulfur Content of Diesel Fuel: Rule 29

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

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

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

- 2  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- 3 Please indicate if this compliance determination method is continuous or intermittent:
- Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
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Time Period Covered by Compliance Certification:

Apr / 01 / 2009 (MM/DD/YY) to Mar / 31 / 2010 (MM/DD/YY)



GENERAL PETROLEUM

April 22, 2010

## Letter of Conformance

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

M/V RYAN T. LUKE, PATRICK FOR DCOR FROM 4/1/09-3/31/10

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-5453 and are 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 - 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) 979-4500  
 Fax: (303) 979-1524

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
<b>ULTIMATE</b>		
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
<b>PROXIMATE</b>		
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	136,604	
Calorific Value, BTU/lb	19,777	
API Gravity	39.6	
Density, g/cc	0.827	
F-Factor, DSCF/MMBTU		9024 @ 60° 8165 @ 68°

By:

  
 Gerard H. Cunningham  
 Fuel Laboratory Manager

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 1491 Permit Condition 1 Item 4	Crew and Work Boat Emission Limits: Rule 29

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

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

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

- 2  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- 3 Please indicate if this compliance determination method is continuous or intermittent:
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- 4  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
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- 6  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
- 7 If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications or non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
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Time Period Covered by Compliance Certification:

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## Platforms Gina and Gilda Fuel Usage (In Gallons)

### Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 75%
Apr-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	10,800	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
Jan-10	7,850	1,963	5,888
Feb-10	9,850	2,463	7,388
Mar-10	11,700	2,925	8,775

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

### Supply Boat Fuel Usage

	Gina		Gilda	
	Mains	Aux	Mains	Aux
Apr-08	635.5	28.48	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	28.47	1906.2	79.42
Aug-08	349.0	3.49	1047.1	43.63
Sep-08	530.3	22.1	1591	66.28
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	113.8	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
Jan-10	122.1	5.09	366.3	15.26
Feb-10	287.6	11.98	862.8	35.95
Mar-10	492.2	20.51	1476.6	61.53

	Gina		Gilda	
	Mains	Aux	Mains	Aux
Rolling 12 Mo Total				
Gina	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	
	40,921		119,044	
	40,024		115,099	
	37,904		110,735	
	36,477		106,703	
	35,705		103,381	
	33,583		98,212	
	32,438		96,564	
	32,748		97,555	

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

	Platform Gina						Platform Gilda							
	ROC TPY	NOX TPY	PM TPY	SOX TPY	CO TPY	ROC TPY	NOX TPY	PM TPY	SOX TPY	CO TPY	ROC TPY	NOX TPY	PM TPY	SOX TPY
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	2.16	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	2.18	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				
Jan-10	0.56	9.42	0.56	0.13	1.71	1.63	27.55	1.65	0.37	5.01				
Feb-10	0.54	9.10	0.54	0.12	1.65	1.60	27.09	1.62	0.36	4.92				
Mar-10	0.54	9.19	0.55	0.12	1.67	1.62	27.36	1.63	0.37	4.96				

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

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**Applicable Requirement Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  PTO 1491 Permit Condition 1 Item 5	Description:  Two Crew Boats Shall not be used Simultaneously: Rule 29
-----------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------

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.

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**Applicable Requirement Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PTO 1491 Permit Condition 1 Item 6	Two Work Boats Shall not be used Simultaneously: Rule 29

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

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

Log book maintained confirming 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."
- 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:

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**Applicable Requirement Part 70 Permit Condition**

Citation, including Attachment Number and/or Permit Condition Number:  PTO 1491 Permit Condition I Item 7	Description:  Boom Boat Fuel Limit: Rule 29
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Monthly records maintained of fuel consumption at boom boats. Annual compliance certification.
------------------------------------------------------------------------------------------------

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



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

Time Period Covered by Compliance Certification:

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**PLATFORM GINA and GILDA BOOM BOAT  
FUEL USAGE 2008-2010**

	<b>Total Usage</b>	<b>12 Mo 'Running' Total</b>	<b>12 Mo 'Running' Total</b>	
	<b>Gasoline</b>	<b>Gasoline</b>	<b>Gina 50%</b>	<b>Gilda 50%</b>
	<b>gallons</b>	<b>gallons</b>	<b>gallons</b>	<b>gallons</b>
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
Jan-10	0.00	7.9	3.95	3.95
Feb-10	0.25	8.1	4.05	4.05
Mar-10	0.10	7.8	3.90	3.90

<b>Permit limit per Platform (gallons/year)</b>	<b>500</b>	<b>500</b>
-------------------------------------------------	------------	------------

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

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**Applicable Requirement Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PTO 1491 Permit Condition 1 Item 8	Solvent Recordkeeping: Rules 23 and 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 the period of 4/1/2009 through 3/31/2010.

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

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

Time Period Covered by Compliance Certification:

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# 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  
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 Applicable Requirement or Part 70 Condition Attachment  
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**Applicable Requirement Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PTO 1491 Condition 2 Section 1 & 4	Flare Fuel Consumption: Rule 29

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

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

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

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

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

Time Period Covered by Compliance Certification:

Apr / 01 / 2009 (MM/DD/YY) to Mar / 31 / 2010 (MM/DD/YY)

**PLATFORM GINA  
FLARE USAGE**

2008-2010	Pilot SCF	Planned MCF	Unplanned MCF	12 Month 'Rolling' Total	
				Pilot MMSCF	Planned MMSCF
Apr-08		5.8	0.0	0.00	2.04
May-08		0.0	0.0	0.00	2.04
Jun-08		0.0	0.0	0.00	2.03
Jul-08		0.0	0.0	0.00	2.02
Aug-08		420.0	0.0	0.00	2.43
Sep-08		979.0	44.0	0.00	3.41
Oct-08		0.0	184.0	0.00	3.41
Nov-08		0.0	50.0	0.00	1.50
Dec-08		170.0	0.0	0.00	1.58
Jan-09		0.0	43.0	0.00	1.58
Feb-09		0.0	35.0	0.00	1.58
Mar-09		216.0	3.0	0.00	1.79
Apr-09		27.0	0.0	0.00	1.81
May-09		0.0	0.0	0.00	1.81
Jun-09		0.0	19.0	0.00	1.81
Jul-09		0.0	0.0	0.00	1.81
Aug-09		0.0	0.0	0.00	1.39
Sep-09		0.0	0.0	0.00	0.41
Oct-09		0.0	0.0	0.00	0.41
Nov-09		0.0	0.0	0.00	0.41
Dec-09		34.0	10.0	0.00	0.28
Jan-10		105.0	0.0	0.00	0.38
Feb-10		26.0	0.0	0.00	0.41
Mar-10		65.0	0.0	0.00	0.26

<i>Permit Limit Planned Flaring MMSCF/YR</i>	<b>16.6</b>
----------------------------------------------	-------------

Notes: Flare has pilot with auto-ignitor.  
Pilot volumes are included in total flare volume for each event.



# PLATFORM GINA FLARE LOG

DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS
4/17/09	1430	1455	8	0	BLEED DOWN H-1 SCRUBBER	PLANNED	CY
4/19/09	1450	1510	8	0	BLEED DOWN H-1 SCRUBBER	PLANNED	DS
4/21/09	0700	0720	11	0	BLEED DOWN H-1 SCRUBBER	PLANNED	DS

Record Flaring greater than 100 PPM H2S. Record all flaring. Report to VCAPCD within 48 hours for unplanned flaring lasting longer than 1 hour; only if >300 ppm H2S.

April-09

**Flaring Requirements:** A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires filing a Breakdown Report to APCD C) Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD E) All flaring >48-hrs require an MMS Variance.

# PLATFORM GINA FLARE LOG

DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	May-09	
					Report on flaring greater than 10 minutes, Report on unplanned flaring longer than 1 hour only if >300 ppm H2S. Call in a Breakdown Report to VCAP/CD within 4 hours for unplanned flaring lasting longer than 1 hour only if >300 ppm H2S.	PLANNED OR UNPLANNED	OPERATOR INITIALS
					No Flaring		

**Flaring Requirements:** A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires filing a Breakdown Report to APCD C) Unplanned and Planned flaring of sweet gas (<300 ppm) only requires logging D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD E) All flaring >48-hrs require an MMS Variance.