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May 5, 2011

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

RE: Annual Compliance Certification Report
Platform Gina, PTO 1491

Dear Mr. Duval:

DCOR, LLC, submits the enclosed Annual Compliance Verification report for Platform Gilda as required by Part 70 Permit to Operate 01491. This report covers the time period of April 1, 2010 through March 31, 2011.

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

**2010 ANNUAL COMPLIANCE
CERTIFICATION REPORT**

PLATFORM GILDA

**PART 70
PERMIT TO OPERATE 1492**

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**

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SECTION 1

Compliance Certification



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SIGNATURE COVER FORM

A copy of each Annual Compliance Certification shall be submitted to EPA, Region 9, at the following address:


Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region 9
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:  Title: Tina Wiegman, ES&RC Manager	Date: 5/6/2011
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Time Period Covered by Compliance Certification <u>04</u> / <u>01</u> / <u>2010</u> (MM/DD/YY) to <u>03</u> / <u>31</u> / <u>2011</u> (MM/DD/YY)

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 • 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 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 	<ul style="list-style-type: none"> • Records of maintenance • Rule 74.10 records 	None	None	
74.9N9	Rule 74.9.D.9	<ul style="list-style-type: none"> • Annual compliance certification • Routine surveillance to ensure diesel-fired engine is used to power cranes and welding equipment only 	<ul style="list-style-type: none"> • Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location 	None	None	
ATCM Engine N3	ATCM for Stationary Compression Ignition Engines -- OCS	<ul style="list-style-type: none"> • Fuel type records • Fuel use records 	<ul style="list-style-type: none"> • Fuel type records • Fuel use records 	None	None	Not federally enforceable

1.c.2. Permit-Specific Conditions

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

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

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1491PC3 - Condition No. 1	Rules 26 and 74.9 200 hours per year backup utility generator operation	<ul style="list-style-type: none"> •Annual compliance certification •Monthly records of backup utility generator hours of operation 	<ul style="list-style-type: none"> •Hours of operation log (non-resettable meter) differentiating non-emergency use and emergency use •Monthly and twelve month rolling records of hours of operation 	None	None	
PO1491PC3 - Condition No. 2	Rule 74.9 200 hours per year / emergency use exemptions	<ul style="list-style-type: none"> •Annual compliance certification •Recordkeeping 	<ul style="list-style-type: none"> •Hours of operation log (non-resettable meter) •Monthly and twelve month rolling records of hours of operation 	None	None	

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 	<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 	
40CFR61.M	40 CFR Part 61, Subpart M	<ul style="list-style-type: none"> Annual Compliance Certification Sec 40 CFR Part 61.145 for inspection procedures 	<ul style="list-style-type: none"> Sec 40 CFR Part 61.145 for recordkeeping procedures. 	<ul style="list-style-type: none"> Sec 40 CFR Part 61.145 for notification procedures 	<ul style="list-style-type: none"> Sec 40 CFR Part 61.145 for test methods 	

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SECTION 2

Breakdowns, Deviations, and Excess Emissions

PTO 1491: Platform Gina

Reporting Period: April 1, 2010 through March 31, 2011

There were ten breakdowns filed during this reporting period, as summarized on the following Annual Compliance Certification Deviation Summary Forms.

Total excess emissions are shown in the following table:

Excess Emissions

NOx (lbs)	ROC (lbs)	CO (lbs)	SOx (lbs)	PM (lbs)	PM10 (lbs)
0	0.0041	0	0	0	0



**ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 04/01/10 to 03/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #:</p> <p>Attachment 71.1.C</p>	<p>B. Equipment description:</p> <p>Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time</p> <p>Begin <u>4/29/10, 21:09</u></p> <p>End <u>4/29/10, 21:15</u></p> <p>When Discovered: Date & Time</p> <p><u>4/29/10, 21:09</u></p>
<p>D. Parameters monitored:</p> <p>Operations of vapor recovery compressor.</p>	<p>E. Limit</p> <p>Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual:</p> <p>No excess emissions as production was shut in and there was no venting.</p>
<p>G. Probable Cause of Deviation</p> <p>The entire platform was automatically shut down on an Emergency Shutdown (ESD) alarm due to a big wave that hit and shook the platform structure.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. The emergency shutdown alarm was re-set and platform operations were resumed with the vapor recovery compressor operational within 6 minutes.</p>

<p>A. Attachment # or Permit Condition #:</p> <p>Attachment 71.1.C</p>	<p>B. Equipment description:</p> <p>Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time</p> <p>Begin <u>5/11/10, 4:50</u></p> <p>End <u>5/11/10, 14:00</u></p> <p>When Discovered: Date & Time</p> <p><u>5/11/10, 4:50</u></p>
<p>D. Parameters monitored:</p> <p>Operations of vapor recovery compressor.</p>	<p>E. Limit</p> <p>Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual:</p> <p>Excess emissions estimated to be 0.0041 lbs ROC</p>
<p>G. Probable Cause of Deviation</p> <p>Vapor recovery compressor shut down due to mechanical failure.</p>		<p>H. Corrective actions taken:</p> <p>The primary VRU compressor was changed out with a spare compressor the same day. During the breakdown, make-up gas system was immediately shut off. Production was shut in and vessels were isolated within 25 minutes.</p>

<p>A. Attachment # or Permit Condition #:</p> <p>Attachment 71.1.C</p>	<p>B. Equipment description:</p> <p>Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time</p> <p>Begin <u>5/18/10, 4:39</u></p> <p>End <u>5/18/10, 4:45</u></p> <p>When Discovered: Date & Time</p> <p><u>5/18/10, 4:39</u></p>
<p>D. Parameters monitored:</p> <p>Operations of vapor recovery compressor.</p>	<p>E. Limit</p> <p>Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual:</p> <p>No excess emissions as production was shut in and there was no venting.</p>
<p>G. Probable Cause of Deviation</p> <p>Loss of electrical power to facility due to SCE service flicker.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. Vapor recovery compressor was started back up as soon as possible after power was restored. All production was shut in and there was no venting; therefore, no excess emissions.</p>



ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04/01/10 to 03/31/11
(MM/DD/YY) (MM/DD/YY)

A. Attachment # or Permit Condition #: Attachment 71.1.C	B. Equipment description: Vapor Recovery Compressor	C. Deviation Period: Date & Time Begin <u>6/28/10, 10:35</u> End <u>6/28/10, 12:05</u> When Discovered: Date & Time <u>6/28/10, 10:35</u>
D. Parameters monitored: Operations of vapor recovery compressor.	E. Limit Produced gas is either directed to sales, vapor compressor or flare.	F. Actual: No excess emissions as production was shut in and there was no venting.
G. Probable Cause of Deviation Loss of electrical power to facility due to SCE outage.		H. Corrective actions taken: Breakdown was reported to the District. Vapor recovery compressor was started back up as soon as possible after power was restored. All production was shut in and there was no venting; therefore, no excess emissions.

A. Attachment # or Permit Condition #: Attachment 71.1.C	B. Equipment description: Vapor Recovery Compressor	C. Deviation Period: Date & Time Begin <u>6/30/10, 6:20</u> End <u>6/30/10, 16:20</u> When Discovered: Date & Time <u>6/30/10, 6:20</u>
D. Parameters monitored: Operations of vapor recovery compressor.	E. Limit Produced gas is either directed to sales, vapor compressor or flare.	F. Actual: No excess emissions as production was shut in and there was no venting.
G. Probable Cause of Deviation Main breaker to all DCOR Ventura facilities failed when So Cal Edison restored power after planned shutdown.		H. Corrective actions taken: Breakdown was reported to the District. The main breaker was repaired. All production was shut in and there was no venting; therefore, no excess emissions.

A. Attachment # or Permit Condition #: Attachment 71.1.C	B. Equipment description: Vapor Recovery Compressor	C. Deviation Period: Date & Time Begin <u>9/18/10, 6:45</u> End <u>9/18/10, 6:48</u> When Discovered: Date & Time <u>9/18/10, 6:45</u>
D. Parameters monitored: Operations of vapor recovery compressor.	E. Limit Produced gas is either directed to sales, vapor compressor or flare.	F. Actual: No excess emissions as production was shut in and there was no venting.
G. Probable Cause of Deviation Loss of electrical power to facility due to SCE service flicker.		H. Corrective actions taken: Breakdown was reported to the District. Vapor recovery compressor was started back up as soon as possible after power was restored. All production was shut in and there was no venting; therefore, no excess emissions.



ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04/01/10 to 03/31/11
(MM/DD/YY) (MM/DD/YY)

A. Attachment # or Permit Condition #: Attachment 71.1.C	B. Equipment description: Vapor Recovery Compressor	C. Deviation Period: Date & Time Begin <u>10/19/10, 18:05</u> End <u>10/19/10, 18:30</u> When Discovered: Date & Time <u>10/19/10, 18:05</u>
D. Parameters monitored: Operations of vapor recovery compressor.	E. Limit Produced gas is either directed to sales, vapor compressor or flare.	F. Actual: No excess emissions as production was shut in and there was no venting.
G. Probable Cause of Deviation Loss of electrical power to facility due to SCE service flicker.	H. Corrective actions taken: Breakdown was reported to the District. Vapor recovery compressor was started back up as soon as possible after power was restored. All production was shut in and there was no venting; therefore, no excess emissions.	

A. Attachment # or Permit Condition #: Attachment 71.1.C	B. Equipment description: Vapor Recovery Compressor	C. Deviation Period: Date & Time Begin <u>2/4/11, 14:07</u> End <u>2/4/11, 16:45</u> When Discovered: Date & Time <u>2/4/11, 14:07</u>
D. Parameters monitored: Operations of vapor recovery compressor.	E. Limit Produced gas is either directed to sales, vapor compressor or flare.	F. Actual: No excess emissions as production was shut in and the make-up gas system was shut down.
G. Probable Cause of Deviation Platform Gina was shut down in a controlled manner when Mandalay Onshore Separation Facility (MOSF) suffered a breakdown in their PLC system.	H. Corrective actions taken: Breakdown was reported to the District. Vapor recovery compressor was started back up as soon as possible after MOSF was back up. During the breakdown, production was shut in and there was no venting; therefore, no excess emissions.	

A. Attachment # or Permit Condition #: Attachment 71.1.C	B. Equipment description: Vapor Recovery Compressor	C. Deviation Period: Date & Time Begin <u>3/8/11, 13:31</u> End <u>3/8/11, 14:20</u> When Discovered: Date & Time <u>3/8/11, 13:31</u>
D. Parameters monitored: Operations of vapor recovery compressor.	E. Limit Produced gas is either directed to sales, vapor compressor or flare.	F. Actual: No excess emissions as production was shut in and the make-up gas system was shut down.
G. Probable Cause of Deviation Loss of electrical power to facility due due to automatic shutdown as a safety measure when construction tripped electrical breaker powering H2S sensors.	H. Corrective actions taken: Vapor recovery compressor was started back up as soon as possible after power was restored. All production was shut in and there was no venting; therefore, no excess emissions.	



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04/01/10 to 03/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #:</p> <p>Attachment 71.1.C</p>	<p>B. Equipment description:</p> <p>Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time</p> <p>Begin <u>3/20/11, 6:15</u></p> <p>End <u>3/20/11, 6:16</u></p> <p>When Discovered: Date & Time</p> <p><u>3/20/11, 6:15</u></p>
<p>D. Parameters monitored:</p> <p>Operations of vapor recovery compressor.</p>	<p>E. Limit</p> <p>Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual:</p> <p>No excess emissions as production was shut in and the make-up gas system was shut down.</p>
<p>G. Probable Cause of Deviation</p> <p>Loss of electrical power to facility due to SCE service flicker.</p>	<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. Vapor recovery compressor was started back up as soon as possible after power was restored. All production was shut in and there was no venting; therefore, no excess emissions.</p>	

SECTION 3

Specific Applicable Requirements



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 04/01/10 to 03/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 71.1N1</p>	<p>D. Frequency of monitoring: Daily, Quarterly</p>
<p>B. Description Fugitive Emission Inspection and Maintenance Program (Rule 74.10) Rule 71.1.B.1a. Compliance via vapor recovery</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: 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.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 71.1N6</p>	<p>D. Frequency of monitoring: Daily, Quarterly</p>
<p>B. Description Crude Oil Production and Separation, Compliance with Vapor Recovery</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: 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.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 71.4N1</p>	<p>D. Frequency of monitoring: Quarterly</p>
<p>B. Description Petroleum Sumps, Pits, Ponds and Well Cellar Compliance</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: 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.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Attachment 74.9N9</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Stationary Internal Combustion Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: All crane and welder IC engines are diesel fired. These engines are used to power the cranes and welders only.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: ATCM for Stationary Combustion Engines</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Stationary Internal Combustion Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Emergency standby stationary internal combustion engine only operated during an emergency or during maintenance operation of not more than 50 hours per calendar year.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

SECTION 4

Permit Specific Conditions



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<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 1</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Monthly Records of Throughput and Fuel Consumption: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Records maintained for platform throughput, equipment hours of operations, and fuel consumption.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 2</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Maximum Number of Oil Wells: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: The platform is permitted with the maximum number of wells, this number cannot be exceeded. This platform has 8 slots with oilwell completions. Annual Compliance Certification.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Well Operations: BACT Requirements: Rule 26</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Annual Compliance Certification verifying that the well H-2 is free flowing, have operated on gas lift, or with electric motor driven artificial lift equipment.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 4</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Maximum Sulfur Content of Diesel Fuel: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Records of sulfur content of diesel fuel maintained from fuel supplier. This diesel fuel is burned in all boats and platform ICEs.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 5</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Crew and Work Boat Emission Limits: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: 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.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 1 Item 6</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Two Crew Boats Shall not be used Simultaneously: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Log book maintained confirming crew boat activity including hours, days, and location of activity. Annual certification of compliance.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 1 Item 7</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Two Work Boats Shall not be used Simultaneously: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Log book maintained confirming work boat activity including hours, days, and location of activity. Annual certification of compliance.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 8</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Boom Boat Fuel Limit: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Monthly records maintained of fuel consumption at boom boats. Annual compliance certification.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 9</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Solvent Recordkeeping: Rules 23 and 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Monthly records maintained of quantity of solvent use and purchases for solvents with ROC content of 25 grams per liter or greater. Chemco 33-5 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 4/1/2010 through 3/31/2011.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 2 Section 1 & 4</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Flare Fuel Consumption: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Monthly records of fuel consumption and flare activity monitored by individual fuel meters on the flare.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 2 Sections 2 & 3</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Flare Ignition System: Rule 71.1</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Monthly testing of flare ignition system.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 3 Sections 1 and 2</p>	<p>D. Frequency of monitoring: Monthly and 12-Month Rolling Average</p>
<p>B. Description New Source Review: Rule 26; and, Stationary Internal Combustion Engines: Rule 74.9</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: 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.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

SECTION 5

General Applicable Requirements



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Period Covered by Compliance Certification: 04/01/10 to 03/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 50</p>	<p>D. Frequency of monitoring: Annual Method 9 Visible Emission Evaluation</p>
<p>B. Description Visible Emissions - Opacity</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Perform routine surveillance and visual inspections to ensure that compliance with Rule 50 is being maintained.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 54.B.1</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Sulfur Compounds - SOx at Point of Discharge</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. If required: EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B or SCAQMD 307-94.</p>
<p>C. Method of monitoring: Record all flare events that exceed one hour or are sour. Source testing upon request.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 54.B.2</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Sulfur Compounds - SOx at or Beyond Property Line</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. If required: BAAQMD Ground Level Monitoring for H2S and SO2</p>
<p>C. Method of monitoring: Record all flare events that exceed one hour or are sour. Source testing upon request.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Rule 57.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Combustion Contaminants, Fuel Burning Equipment</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Calculations based on Ventura County APCD approved methods</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 64.B1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Sulfur Content of Fuels (Gaseous)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: The only gas combustion on Platform Gina is flare gas combustion, where no useful energy is produced.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 64.B2</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Sulfur Content of Fuels (Liquid)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Records are maintained from diesel fuel supplier certifying the sulfur content of fuel used for all ICEs and boats.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>D. Frequency of monitoring: Daily, Quarterly, Annually</p>
<p>B. Description Crude Oil Production and Separation</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Produced gas must be controlled at all times and is verified through the daily visual and periodic maintenance of the produced gas collection system on Platform Gina. Produced gas is either directed to sales, vapor compressor or flare. Compliance with Rule 74.10 ensures that various components are not leaking. The produced gas stream is a fully controlled closed loop system.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>Y</u> *Deviation Summary Form in Report Section #2</p>
<p>A. Attachment # or Permit Condition #: Rule 71.4.B1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Petroleum Sumps, Pits, and Well Cellars - First Stage Sump Prohibition</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: There are no first stage sumps on Platform Gina. Offshore platforms are equipped with non-leaking stuffing boxes, oil is never stored in an open "pit" or cellar.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Rule 71.4.B3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Petroleum Sumps, Pits, and Well Cellars - Well Cellar Storage Prohibition</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: There are no well cellars on Platform Gina. Offshore platforms are equipped with non-leaking stuffing boxes, oil is never stored in an open "pit" or cellar.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Rule 74.6</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Surface Cleaning and Degreasing</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: 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.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Rule 74.10</p>	<p>D. Frequency of monitoring: Daily, Quarterly, Annually</p>
<p>B. Description Components at Crude Oil and Natural Gas Production Processing Facilities</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Maintain a fugitive emission inspection and maintenance program that is consistent with the requirements of Rule 74.10.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Rule 74.11.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Large Water Heaters and Small Boilers</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Platform Gina has no water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than 75,000 BTU/hr.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04/01/10 to 03/31/11
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<p>A. Attachment # or Permit Condition #: Rule 74.22</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Natural Gas Fired Fan - Central Furnaces</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: There are no natural gas fired fan-type furnaces on the platform. Platform Gina is not subject to this requirement.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

SECTION 6

General Requirements for Short-Term Activities

General Permit Conditions

Miscellaneous Federal Program Conditions



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<p>A. Attachment # or Permit Condition #: Rule 74.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Abrasive Blasting</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Visible emission evaluation during abrasive blasting operations. Use of California Certified abrasive sands.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.2</p>	<p>D. Frequency of monitoring: Monthly Records, Annual Compliance Certification</p>
<p>B. Description Architectural Coatings</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: 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.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.16</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Oilfield Drilling Operations</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: All drilling operations powered by grid power, or have exemption from grid power.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



Ventura County
Air Pollution
Control District

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Period Covered by Compliance Certification: 04/01/10 to 03/31/11
(MM/DD/YY) (MM/DD/YY)

A. Attachment # or Permit Condition #: 40 CFR Part 61, Subpart M	D. Frequency of monitoring: Annual Compliance Certification
B. Description National Emission Standard for Asbestos	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A
C. Method of monitoring: No asbestos demolition or renovation activities took place during the period of 4/1/2010 through 3/31/2011.	F. Currently In compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 04/01/10 to 03/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Part 70 General</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description General Part 70 Permit Conditions</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1491</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: PO General</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description General Permit to Operate Conditions</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1491</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 04/01/10 to 03/31/11
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 55</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Outer Continental Shelf Air Regulations</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1491</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40 CFR Part 68</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Accidental Release Prevention and Risk Management Plans</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1491</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40 CFR Part 82</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Protection of Stratospheric Ozone</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1491</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

SECTION 7
Supporting Documentation

PLATFORM GINA DIESEL CRANE FUEL USAGE

GINA	CRANE		
	325 bhp CAT 3406B		
	Hrs.	Gal.	12 Mo. Rolling Total Gal
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
Apr-10	10	60	1,112
May-10	16	100	1,119
Jun-10	11	69	1,102
Jul-10	10	55	1,040
Aug-10	10	62	980
Sep-10	8	53	912
Oct-10	10	65	870
Nov-10	10	50	821
Dec-10	10	69	838
Jan-11	10	64	830
Feb-11	12	73	836
Mar-11	11	66	786
Crane permit limits			
		2,870 gal/yr	



Hazen Research, Inc.
4601 Indiana Street
Golden, CO 80403 USA
Tel: (303) 279-4501
Fax: (303) 279-1526


DATE September 9, 2010
PROJ. # 009-479
CTRL # H264/10
REC'D 08/20/10

Aeros Environmental, Inc.
Lisa Marriott-Smith
18828 Highway 66
Bakersfield, California 93308

Sample Number: H264/10-1
Sample Identification: Diesel Fuel 08/18/10 OCS Supply Boat Ryan T Main Engines Project #092-6792B

	As Assayed	Normalized
ULTIMATE		
Water, %	0.011	0.011
Ash, %	<0.001	<0.001
Sulfur, %	0.006	0.006
Carbon, %	89.42	87.78
Hydrogen, %	12.3	12.1
Nitrogen, %	0.13	0.13
Oxygen, %*	<0.01	0.00
PROXIMATE		
Water, %	0.011	0.011
Ash, %	<0.001	<0.001
Volatile Matter, %	99.99	99.99
Fixed Carbon, %*	<0.01	0.00
Calorific Value, BTU/gallon	136,876	
Calorific Value, BTU/lb	19,807	
API Gravity	39.4	
Density, g/cc	0.828	
F-Factor, DSCF/MMBTU @ 68° F		9001 @ 68°

By:


Gerard H. Cunningham
Fuel Laboratory Manager



Petroleum Testing Services, Inc.

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

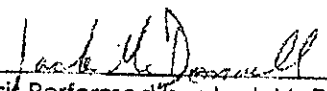
August 20, 2010
Job #: AEI 082010-2
Page: 1 of 1


Lisa Marriott-Smith

Laboratory Report

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

<u>Sample ID</u>	<u>Sulfur, ppm ASTM D7039</u>
DCOR, LLC Location: OCS Supply Boat Ryan T, 08/18/2010, Project # 092-6792B, PO#: 20371, Unit: Main Engines District: SBCAPCD, Diesel Fuel	7


Analysis Performed by: Jack McDonnell


Report Reviewed by: John Hatem

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.



Hazen Research, Inc.
4601 Indiana Street
Golden, CO 80403 USA
Tel: (303) 770-4501
Fax: (303) 770-1500


DATE September 9, 2010
PROJ. # 009-479
CTRL # H263/10
REC'D 08/20/10

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

Sample Number: H263/10-1
Sample Identification: Diesel Fuel 08/17/10 OCS Crew Boat Alan T Main Engines Project #092-6792A

	As Assayed	Normalized
ULTIMATE		
Water, %	0.010	0.010
Ash, %	<0.001	<0.001
Sulfur, %	0.016	0.016
Carbon, %	89.54	87.81
Hydrogen, %	12.3	12.1
Nitrogen, %	0.11	0.11
Oxygen, %*	<0.01	0.00
PROXIMATE		
Water, %	0.010	0.010
Ash, %	<0.001	<0.001
Volatile Matter, %	99.99	99.99
Fixed Carbon, %*	<0.01	0.00
Calorific Value, BTU/gallon	136,341	
Calorific Value, BTU/lb	19,682	
API Gravity	39.0	
Density, g/cc	0.830	
F-Factor, DSCF/MMBTU @ 68° F		8971.660 9058 @ 68°

By:


Gerard H. Cunningham
Fuel Laboratory Manager



Petroleum Testing Services, Inc.

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

August 20, 2010
Job #: AEI 082010-3
Page: 1 of 1

Lisa Marriott-Smith


Laboratory Report

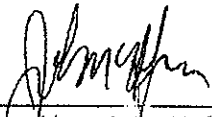
Matrix: Diesel Fuel
Sample Preparation: None, determined as is
Results:

Sample ID **Sulfur, ppm**
ASTM D7039

DCOR, LLC
Location: OCS Crew Boat Alan T, 08/17/2010,
Project # 092-6792A, PO#: 20369, Unit: Main Engines
District: SBCAPCD, Diesel Fuel

7


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

Platforms Gina and Gilda Fuel Usage (in Gallons)

Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 76%
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
Apr-10	9,951	2,488	7,463
May-10	12,200	3,050	9,150
Jun-10	9,101	2,275	6,826
Jul-10	10,350	2,588	7,763
Aug-10	9,825	2,456	7,369
Sep-10	9,875	2,469	7,406
Oct-10	9,925	2,481	7,444
Nov-10	9,700	2,425	7,275
Dec-10	10,150	2,538	7,613
Jan-11	10,240	2,560	7,680
Feb-11	9,951	2,488	7,463
Mar-11	13,800	3,450	10,350
2010 Total	30,119	90,358	

Supply Boat Fuel Usage

	Gina		Gilda	
	Mains	Aux	Mains	Aux
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
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
Apr-10	537.4	22.39	1612.1	67.17
May-10	601.4	25.06	1804.1	75.17
Jun-10	321.9	13.42	965.8	40.25
Jul-10	96.00	4.00	287.90	12.00
Aug-10	157.4	1.57	472.3	19.68
Sep-10	174.70	7.28	524.00	21.83
Oct-10	173.40	7.23	520.20	21.68
Nov-10	214.06	8.92	642.19	26.76
Dec-10	121.31	5.05	363.92	15.16
Jan-11	158.60	6.61	475.80	19.82
Feb-11	150.30	6.26	450.70	18.78
Mar-11	390.10	16.25	1170.20	48.76
2010 Total	3,299	133	9,898	412

	Rolling 12 Mo Total	
	Gina	Gilda
	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
	33,583	98,212
	32,438	96,564
	32,748	97,555
	32,843	97,530
	33,074	98,526
	33,081	98,698
	33,014	98,628
	32,984	98,313
	33,209	98,878
	33,688	99,280
	34,366	100,035
	34,671	100,668
	35,440	102,575
	34,740	102,221
	34,688	103,477

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

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

	Platform Gina					Platform Gilda				
	ROC TPY	NOx TPY	PM TPY	SOx TPY	CO TPY	ROC TPY	NOx TPY	PM TPY	SOx TPY	CO TPY
Apr-09	0.74	12.57	0.75	0.17	2.29	2.19	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	1.97	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	0.60	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	1.71	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	4.98
Apr-10	0.54	9.21	0.55	0.12	1.67	1.62	27.36	1.63	0.37	4.97
May-10	0.55	9.28	0.55	0.12	1.69	1.63	27.64	1.65	0.37	5.02
Jun-10	0.55	9.28	0.55	0.12	1.69	1.64	27.68	1.65	0.37	5.03
Jul-10	0.55	9.26	0.55	0.12	1.68	1.63	27.67	1.65	0.37	5.03
Aug-10	0.55	9.25	0.55	0.12	1.68	1.63	27.58	1.65	0.37	5.01
Sep-10	0.55	9.32	0.56	0.12	1.69	1.64	27.74	1.66	0.37	5.04
Oct-10	0.56	9.45	0.56	0.13	1.72	1.65	27.85	1.66	0.37	5.06
Nov-10	0.57	9.64	0.58	0.13	1.75	1.66	28.06	1.68	0.38	5.10
Dec-10	0.57	9.73	0.58	0.13	1.77	1.67	28.24	1.69	0.38	5.13
Jan-11	0.59	9.94	0.59	0.13	1.81	1.70	28.77	1.72	0.38	5.23
Feb-11	0.58	9.74	0.58	0.13	1.77	1.69	28.67	1.71	0.38	5.21
Mar-11	0.57	9.73	0.58	0.13	1.77	1.72	29.03	1.73	0.39	5.28

Emission Factors	
ROC	33.15 lb/Mgal
NOx	561.00 lb/Mgal
PM	33.50 lb/Mgal
SOx	7.50 lb/Mgal
CO	102.00 lb/Mgal

Permitted Emissions	
PI Gina	PI Gilda
	1.40
	23.68
	1.41
	0.31
	4.31
	4.20
	71.07
	4.24
	0.95
	12.92

Supporting Documentation
 PC 1, #5

**PLATFORM GINA and GILDA BOOM BOAT
Fuel Usage
2 - 70 bhp Suzuki Gasoline Engines, Model DF-70**

	Total Usage	12 Mo 'Running' Total	12 Mo 'Running' Total	
	Gasoline	Gasoline	Gina 50%	Gilda 50%
	gallons	gallons	gallons	gallons
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
Apr-10	0.05	6.3	3.13	3.13
May-10	0.10	6.2	3.10	3.10
Jun-10	0.00	3.0	1.50	1.50
Jul-10	2.40	5.4	2.70	2.70
Aug-10	0.70	6.1	3.05	3.05
Sep-10	0.70	6.8	3.40	3.40
Oct-10	0.10	6.7	3.35	3.35
Nov-10	0.10	5.9	2.95	2.95
Dec-10	1.45	6.0	2.98	2.98
Jan-11	0.00	6.0	2.98	2.98
Feb-11	0.05	5.8	2.88	2.88
Mar-11	2.55	8.2	4.10	4.10

Permit limit per Platform (gallons/year)	500	500
---	------------	------------

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

Supporting Documentation
PC 1, #8

**PLATFORM GINA
FLARE USAGE**

2009-2011	Pilot	Planned	Unplanned	12 Month 'Rolling' Total	
	SCF	MCF	MCF	Pilot MMSCF	Planned MMSCF
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
Apr-10		0.0	0.0	0.00	0.23
May-10		0.0	0.0	0.00	0.23
Jun-10		0.0	0.0	0.00	0.23
Jul-10		0.0	0.0	0.00	0.23
Aug-10		0.0	0.0	0.00	0.23
Sep-10		0.0	0.0	0.00	0.23
Oct-10		0.0	0.0	0.00	0.23
Nov-10		0.0	12.0	0.00	0.23
Dec-10		0.0	0.0	0.00	0.20
Jan-11		0.0	0.0	0.00	0.09
Feb-11		0.0	0.0	0.00	0.07
Mar-11		0.0	0.0	0.00	0.00

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

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

Supporting Documentation
PC 2, #1 and #4

PLATFORM GINA
 EMERGENCY STANDBY GENERATOR
 450 bhp Diesel Engine, Cummins 3406

	HOURS		HOURS	
	Non-Emergency	Emergency	Monthly Total	Annual Total
Jan-10	0.9		0.9	0.9
Feb-10	1.4		1.4	2.3
Mar-10	0.9		0.9	3.2
Apr-10	0.9		0.9	4.1
May-10	0.7		0.7	4.8
Jun-10	0.9	34.4	35.3	40.1
Jul-10	0.6		0.6	40.7
Aug-10	1.3		1.3	42.0
Sep-10	0.8		0.8	42.8
Oct-10	0.8		0.8	43.6
Nov-10	1.0		1.0	44.6
Dec-10	0.6		0.6	45.2
Jan-11	1.3		1.3	1.3
Feb-11	1.1		1.1	2.4
Mar-11	0.9		0.9	3.3

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

PLATFORM GINA
Visible Emissions Inspection Record - VCAPCD

Date	Time	Inspected by	Emission Unit	Observations/Corrective Action
7-May-10	13:00 - 13:02	James Vanhoy	Seaking Crane	No Visible Emissions
7-May-10	13:20 - 13:22	James Vanhoy	Standby Generator	No Visible Emissions
10-Jan-11	13:38 - 13:40	Kirk Cormany	Standby Generator	No Visible Emissions
10-Jan-11	13:51 - 13:53	Kirk Cormany	Seaking Crane	No Visible Emissions

Platform Gina Flaring Events 142 MMBtu/hr Flare						
Flare Date	MCF flared	Sweet Gas Emission factor lb/MMCF	SO2 Emissions lb	H2S ppm	Sour Gas Emission factor lb/MMCF	SO2 Emissions lb
15-Nov-10	12	0.6	0.007	0	0.00	0.000
TOTAL	12.0		0.01			0.00
TOTAL SULFUR EMISSIONS					0.01	lb SO2
Annual Limits:						
2,492 MCF/year (per VCAPCD, platform specific limit based on previous 5 years from when rules were written)						
4.41 tons SOx/year (per PTO 1491, Table 4)						

Monthly Flare Logs

Supporting Documentation

PC 2, #1 and #4

Rule 54.B1, 54.B2

PLATFORM GINA FLARE LOG

Record all flaring (greater than 10 minutes) - Record 10 min. or less, including planned flaring, longer than 30 minutes, including unplanned flaring, longer than 30 minutes, including planned flaring, longer than 30 minutes, including unplanned flaring, longer than 30 minutes.						April-10	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME
					No Flared Gas this Month		

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

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm H ₂ S measured or estimated if flaring is unplanned. H ₂ S greater than 300 ppm requires filing a Breakdown Report to APCD. H ₂ S greater than 300 ppm requires logging. H ₂ S greater than 48 hrs requires a 72-hr written notice to APCD. Only flaring longer than 1-hr is to be logged.							May-10	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H ₂ S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS	
					No Flared Gas this Month			

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

Records all flaring greater than 40 minutes, flaring greater than 1000 MCF, flaring of sweet gas, unplanned flaring greater than 24 hours, unplanned flaring lasting longer than 1 hour and 300 ppm H2S <small>Call the Breakdown Report to O&A with estimated H2S and flaring volume.</small>						June-10	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS
					No Flared Gas this Month.		

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

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record operations for Sweet gas						July-10	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS
					No Flaring this Month		

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

PLATFORM GINA FLARE LOG

Record all flaring (greater than 10 minutes, Record ppm not "sweet" or "dry", Call in Breakdown Report to VCA if Unplanned flaring lasting longer than 1 hour or > 300 ppm H2S							August-10	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS	
					NO FLARED GAS THIS MONTH.			

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

Records all flaring greater than 10 minutes, Record down if flaring greater than 24 hrs not sweet gas								November-10	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS		
11/5/10	07:12	08:25	12	0	MOSF Upset	UNPLANNED	R.B.		

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

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm for sweet or sour gas. California Breakdown Report to CAPCD within 24 hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S					December-10		
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME
					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.

PLATFORM GINA FLARE LOG

California Breakdown Report (CBA) per month from 1/1/11 to 1/31/11 Record all flaring greater than 10 minutes. Record all planned flaring >300 ppm H2S. Record all unplanned flaring lasting longer than 1 hour only if >300 ppm H2S not sweet gas								January-11	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS		
					NO FLARE EVENTS THIS MONTH				

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

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record flaring not sweep or x							February-11	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS	
					NO FLARE EVENTS THIS MONTH			

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

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not "sweet" or "x"	Callina Breakdown Report to VAPCD within 48 hours for unplanned flaring lasting longer than 1 hour only if >300 ppm H2S			March-11			
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME
					NO FLARE EVENTS THIS MONTH		

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.



2/22/11

Letter of Conformance

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

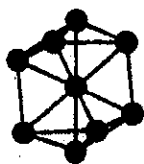
DCOR for the M/V RYAN T, LUKE, PATRICK, PETER MAC,

FREEDOM/KENNETH CARL FROM 4/1/2010-3/31/2011

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
A Maxum Petroleum Company
Oxnard Division
Office (805) 299-1219



American Research and Testing Inc.

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

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

NUMBER
207-11-095
November 14, 2007

SUBJECT: VOC of Chemco 33-S

REFERENCE:

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

SAMPLE DESCRIPTION:

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

REQUEST:

Determine the VOC of the sample.

METHOD:

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

RESULTS:

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

SIGNED FOR THE COMPANY

by

B. Belmont

B. Belmont
Senior Chemist

Rita R. Boggs, Ph.D.

Rita R. Boggs, Ph.D.
President

CHEMCO PRODUCTS COMPANY
6401 E. Alondra Blvd.

Supporting Documentation Rule 74.6
Paramount, CA 90723
Emergency Phone No. 1-800-255-3924

MATERIAL SAFETY DATA SHEET

SECTION I. IDENTIFICATION OF PRODUCT

Name: CHEMCO 33-S
Identity: All Purpose Alkaline Degreaser MSDS Number: 0041 Date: 8/04/2008 Supersedes: 11/18/2004
HEALTH: 1 FIRE: 0 REACTIVITY: 0 PROTECTION: B

SECTION II. HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

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

SECTION III. PHYSICAL/CHEMICAL CHARACTERISTICS

Boiling Point: >212° F	Specific Gravity: 1.068 ± 0.005	Vapor Pressure (mm Hg.): ND	Melting Point: ND
Vapor Density (Air = 1): ND	Evaporation (H2O = 1): ND	Water Solubility: Complete	pH @ 77° F: 13.0 ± 0.5
Appearance and Odor: Clear yellow-green liquid, cucumber odor			VOCgm/L: 44 Diluted with H2O 1:1 Resulting VOC gm/L: 22

SECTION IV. FIRE AND EXPLOSION HAZARD DATA

Flash Point (TCC): None	% LEL: ND	% UEL: ND	Flammable Limits: ND
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Extinguishing Media: Water fog, foam, carbon dioxide. Cool containers exposed to flames with water from side.

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

Unusual Fire and Explosion: None known

SECTION V. HEALTH HAZARD DATA

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

(Acute) Health Hazards:

Eyes: May cause irritation, redness and pain

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

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

Inhalation: May cause irritation of upper respiratory tract

(Chronic) Health Hazards: Prolonged or repeated skin contact may cause skin irritation. This product is not listed as or anticipated to be a potential carcinogen by NTP or OSHA.

Signs and Symptoms of Exposure:

Eyes: Redness, irritation and blurry vision

Skin: May cause irritant reaction on prolonged contact

Ingestion: Abdominal discomfort, nausea, vomiting and diarrhea

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

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

Emergency First Aid Procedures:

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

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

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

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

0041

Carcinogenicity: NTP? No

SECTION VI. TOXICITY DATA
IARC No

OSHA REGULATED? No

SECTION VII. REACTIVITY DATA

Stability: Stable

Hazardous Polymerization Will Not Occur

Incompatibility (Materials to Avoid): Strong acids, alkali and oxidizers

Hazardous Decomposition Byproducts: Carbon dioxide and carbon monoxide

SECTION VIII. PRECAUTIONS FOR SAFE HANDLING AND USE

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

Small Spills: Mop up. Slippery on floor. Collect spilled material and place in a properly labeled container for later disposal.

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

Disposal: Dispose of to meet Federal, State & Local requirements

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

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

SECTION IX. CONTROL MEASURES

Respiratory Protection: NIOSH approved air purifying, if experiencing respiratory irritation

Ventilation: Normal ventilation.

Local Exhaust: Recommended if generating mist or vapors

Mechanical (General): Recommended if generating mist or vapors

Protective Gloves: Rubber, vinyl

Eye Protection: Chemical safety goggles

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

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

SECTION X. DOT INFORMATION
NOT REGULATED

SECTION XI. MISCELLANEOUS INFORMATION

SARA 313: 2-butoxyethanol

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

NA - Not Available

NE - Not Established

ND - Not Determined

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
Report for the 2nd Quarter of 2010

FACILITY: DCOR PLATFORM GINA		PERMIT#: 1491					
Method of Inspection: TVA	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	195	1,201	0	1	0	
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	
	Total # Leaking:	0	2	0	0	0	
	% Leaking:	0.00%	0.17%	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)
PVRV	Drill Deck, T-750	6/24/2010 7:30AM	6/24/2010 7:30AM	16,000	N/A	6/24/2010	50
Valve - Orifice	Well Bay, Meter #3717	6/24/2010 8:30AM	6/24/2010 8:30AM	8,000	N/A	6/24/2010	0
PVRV	Sub Deck, T-802	6/24/2010 10:30AM	6/24/2010 10:30AM	2,800	N/A	6/30/2010	0
PVRV	Sub Deck, T-80	6/24/2010 11:00AM	6/24/2010 11:00AM	7,000	N/A	6/30/2010	0

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
 Report for the 3rd Quarter of 2010

FACILITY: <u>DCOR PLATFORM GINA</u>				PERMIT#: <u>1491</u>			
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	195	1,201	0	1	0	
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	
	Total # Leaking:	0	0	0	0	0	
	% Leaking:	0.00%	0.00%	0.00%	0.00%	0.00%	
Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
Valve	Well Bay	Sep 9 7:30AM	Sep 9 7:30AM	6,000	N/A	09/09/2010	0
Tube Fitting	Well Bay	Sep 9 7:50AM	Sep 9 7:50AM	12,000	N/A	09/09/2010	0
Paddle Shaft	Production Deck	Sep 9 9:20AM	Sep 9 9:20AM	50,000	N/A	09/09/2010	40

**VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
Report for the 4th Quarter of 2010**

FACILITY: <u>DCOR PLATFORM GINA</u>		PERMIT#: <u>1491</u>					
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	195	1,201	0	1	0	
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	
	Total # Leaking:	0	0	0	0	0	
	% Leaking:	0.00%	0.00%	0.00%	0.00%	0.00%	
Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
Valve - Ball	Well Bay, Meter #3713	11/03/2010 9:00AM	11/03/2010 9:00AM	30,000	N/A	11/3/2010	0
Valve - Casing Wing	Well Bay, Well #H-4	11/03/2010 9:40AM	11/03/2010 9:40AM	1,600	N/A	11/3/2010	0

Inspection performed utilizing EPA Method 21
PREPARED BY AVANTI ENVIRONMENTAL, INC.

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
Report for the 1st Quarter of 2011

FACILITY: <u>DCOR PLATFORM GINA</u>		PERMIT#: <u>1491</u>					
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	195	1,201	0	1	0	
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	
	Total # Leaking:	0	0	0	0	0	
	% Leaking:	0.00%	0.00%	0.00%	0.00%	0.00%	
Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
Valve - Casing Wing	Well Bay, Well #H-8	03/28/2011 8:15AM	03/28/2011 8:15AM	12,000	N/A	3/28/2011	0