



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

May 14, 2014

Mr. Dan Searcy
Ventura County APCD
669 County Square Drive, Second Floor
Ventura, CA 93003

RE: Annual Compliance Certification Report
Platform Gina, PTO #1491

Dear Mr. Searcy:

DCOR, LLC, is submitting the enclosed Annual Compliance Certification Report for Platform Gina as required by Part 70 Permit to Operate #1491. This report covers the time period of April 1, 2013, through March 31, 2014.

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

Sincerely,

A handwritten signature in blue ink that reads "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

RECEIVED
VENTURA COUNTY APCD
14 MAY 15 PM 12:36
A.P.C.D.



DCOR, LLC

**2013 ANNUAL COMPLIANCE
CERTIFICATION REPORT
for the time period 4/1/2013-3/31/2014**

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**

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DCOR, LLC – PLATFORM GINA – PTO 1491

2013

COMPLIANCE VERIFICATION REPORT

For the time period 4/1/2013 – 3/31/2014

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 - Miscellaneous Federal Program Conditions
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SECTION	1
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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: Robert Garcia, Vice President California Offshore Operations	Date: 5.14.14
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Time Period Covered by Compliance Certification 04 / 01 / 2013 (MM/DD/YY) to 03 / 31 / 2014 (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 	<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
40CFR63ZZZ3	RICE MACT for emergency diesel engines – oil change and inspections	<ul style="list-style-type: none"> Maintenance records Use non-resettable hour meter Annual compliance certification 	<ul style="list-style-type: none"> Maintenance records Hours of operation records 	None	None	
40CFR63ZZZ5	RICE MACT for non-emergency diesel engines > 300 HP & ≤ 500 HP, CO ppm limit	<ul style="list-style-type: none"> Initial CO source testing Maintain catalyst pressure / temperature Annual compliance certification 	<ul style="list-style-type: none"> Initial CO testing records 	As specified in Sections 63.6650(c)(1) – (6)	Portable analyzer, or EPA Methods 3, 4, and 10 or their designated alternatives	

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	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO1491PC1 - Condition No. 3	Rule 26 BACT Well	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO1491PC1 - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	<ul style="list-style-type: none"> Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery Annual compliance certification 	Fuel records	None	None	
PO1491PC1 - Condition No. 5	Rules 26 and 29 Crew Boat and Work Boat Emission Limits	<ul style="list-style-type: none"> Diesel fuel consumption for boats servicing Platforms Gina and Gilda Monthly calculations of emissions (boats) Annual compliance certification Maintain a log book of hours and days of crew boat operation Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of diesel fuel consumption Monthly calculations of emissions (boats) 	None	None	
PO1491PC1 - Condition No. 6	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> Annual compliance certification Maintain a log book of hours and days of crew boat operation Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of crew boat operation 	None	None	
PO1491PC1 - Condition No. 7	Rule 29 Two Work Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation 	None	None	
PO1491PC1 - Condition No. 8	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. 9	Rules 23 and 29 Solvent Recordkeeping	<ul style="list-style-type: none"> Maintain a list of exempt solvents Annual compliance certification 	<ul style="list-style-type: none"> Maintain a list of exempt solvents 	None	None	
PO1491PC2 - Condition Nos. 1, 2, and 5	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 3 and 4	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 Nos. 2 and 3	Rule 74.9 200 hours per year / emergency use exemptions	<ul style="list-style-type: none"> Annual compliance certification Recordkeeping 	<ul style="list-style-type: none"> Hours of operation log (non-resettable meter) Monthly and twelve month rolling records of hours of operation 	None	None	

1.c.3. General Applicable Requirements

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	<ul style="list-style-type: none"> • Routine surveillance • Visual inspections • Annual compliance certification, including a formal survey • Opacity readings upon request • Notification required for uncorrectable visible emissions 	<ul style="list-style-type: none"> • All occurrences of visible emissions for periods > 3 min in any one hour • Annual formal survey of all emissions units 	None	<ul style="list-style-type: none"> • Opacity - EPA Method 9 	
54.B.1 (OCS)	Rule 54.B.1	<ul style="list-style-type: none"> • Annual compliance certification • Identify planned vs. unplanned flaring event • Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event • Upon request, source test for sulfur compounds at point of discharge 	<ul style="list-style-type: none"> • Representative fuel analysis or exhaust analysis and compliance demonstration • Flare records 	None	<ul style="list-style-type: none"> • Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate 	
54.B.2 (OCS)	Rule 54.B.2	<ul style="list-style-type: none"> • Annual compliance certification • Identify planned vs. unplanned flaring event • Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event • Determine ground or sea level concentrations of SO₂ upon request • Annual compliance certification 	<ul style="list-style-type: none"> • Representative fuel analysis or exhaust analysis and modeling data or other compliance demonstration • Flare records 	None	<ul style="list-style-type: none"> • SO₂ - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H₂S and SO₂ 	
57.1	Rule 57.1	<ul style="list-style-type: none"> • Annual compliance certification 	None	None	None	<ul style="list-style-type: none"> • Not required based on District analysis
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> • Annual compliance certification • None for PUC-quality gas • Annual test for non PUC-quality gas (submit with annual compliance certification) 	<ul style="list-style-type: none"> • Annual fuel gas analysis for non PUC-quality gas 	None	<ul style="list-style-type: none"> • SCAQMD Method 307-94 	
64.B.2	Rule 64.B.2	<ul style="list-style-type: none"> • Annual compliance certification • Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification) 	<ul style="list-style-type: none"> • Fuel supplier's certification, or fuel test per each delivery 	None	<ul style="list-style-type: none"> • ASTM Method D4294-83 or D2622-87 	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.1.C	Rules 71.1.C and 74.10	<ul style="list-style-type: none"> Annual compliance certification Rule 74.10 inspections Visual inspection to ensure collection system is closed Quarterly inspection of flare to ensure proper operation 	<ul style="list-style-type: none"> Records of inspections of flare Rule 74.10 records 	None	None	<ul style="list-style-type: none"> Compliance with Rule 74.10 ensures compliance with the gas collection system's maintenance requirements
71.4.B.1	Rule 71.4.B.1	<ul style="list-style-type: none"> Annual compliance certification to ensure there are no first stage sumps 	None	None	None	
71.4.B.3	Rule 71.4.B.3	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance and visual inspections of well cellars 	<ul style="list-style-type: none"> Records of maintenance or well workover activity during periods of crude oil storage 	None	None	
74.6	Rule 74.6	<ul style="list-style-type: none"> Annual compliance certification Maintain current solvent information Routine surveillance of solvent cleaning activities Upon request, solvent testing 	<ul style="list-style-type: none"> Records of current solvent information 	None	<ul style="list-style-type: none"> ROC content-EPA Test Method 24 or 24A Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 True vapor pressure or composite partial pressure -ASTM D2879-86 Initial boiling point-ASTM 1078-78 or published source Spray gun active/passive solvent losses-SCAQMD Method (10-3-89) 	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.10	Rule 74.10	<ul style="list-style-type: none"> Annual compliance certification Identify leaking components Inspections every shift or 8 hours at natural gas processing plants Daily and/or weekly inspections for specified equipment Quarterly inspections for specified components Pressure relief valve inspections Annual update to Operator Management Plan Notification of major leaks in critical components Notification of repeat leaks 	<ul style="list-style-type: none"> Records of leak inspections in inspection log 	None	<ul style="list-style-type: none"> Gas Leaks - EPA Method 21 ROC Concentration of Gas Streams - ASTM E168-88, ASTM E169-87, or ASTM E260-85 Weight percentage of evaporated compounds of liquids - ASTM Method D 86-82 API Gravity - ASTM Method D287 	
74.11.1	Rule 74.11.1	<ul style="list-style-type: none"> Annual compliance certification Maintain identification records of large water heaters and small boilers 	<ul style="list-style-type: none"> Records of current information of large water heaters and small boilers 	None	None	<ul style="list-style-type: none"> Rule only applies to future installation of large water heaters and small boilers
74.22	Rule 74.22	<ul style="list-style-type: none"> Annual compliance certification Maintain furnace identification records 	<ul style="list-style-type: none"> Records of current furnace information 	None	None	<ul style="list-style-type: none"> Rule only applies to future installation of natural gas-fired, fan-type furnaces

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

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

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

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SECTION	2
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PTO 1491: Platform Gina

Reporting Period: April 1, 2013 through March 31, 2014

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

There were six deviation reports filed.

Notices of Violation (NOV) 22885 and 22886 were issued on 11/18/13.

Excess Emissions

Date	NOx (lbs)	ROC (lbs)	CO (lbs)	SOx (lbs)	PM (lbs)	PM10 (lbs)
4/23/2013	0	1.53	0	0	0	0
6/25/2013	0	0.002	0	0	0	0
Total	0	1.532	0	0	0	0

Platform Gina

List of deviations and breakdowns 4/1/2013-3/31/2014:

				Count Breakdown Reports	Count Deviation Reports
1	4/23/2013	Deviation	The vapor recovery compressor was shut-down accidentally when it was not put in by-pass mode while conducting safety alarm testing.		1
2	4/28/2013	Breakdown	The platform, including the vapor recovery compressor, was automatically shut-down due to high pressure safety alarm triggered by high pressure detected while well pressure was bled down in preparation for required well maintenance.	1	
3	5/6/2013	Breakdown	The platform, including the vapor recovery compressor, was shut-down due to fire protection system operational issues.	1	
4	5/22/2013	Breakdown	The platform, including the vapor recovery compressor, was automatically shut-down due to SCE power outage.	1	
5	6/25/2013	Breakdown	The vapor recovery compressor was shut-down due to a broken belt drive.	1	
6	8/27/2013	Breakdown	The vapor recovery compressor was shut-down for safety reasons after a hairline crack was discovered in the discharge manifold.	1	
7	9/10/2013	Breakdown	The platform, including the vapor recovery compressor, was automatically shut-down due to pressure safety low alarm.	1	
8	9/19/2013	Deviation	The vapor recovery compressor was shut-down due to a SCE Demand Response Program (Base Interruptible Power) Outage		1
9	10/17/2013	Breakdown	The VRU compressor was shut-down when an emergency platform shut-down was initiated by a Pressure Safety High (PSH) alarm triggered on the Flare Scrubber Vessel during VEE testing.	1	
10	11/4/2013	Breakdown	The VRU compressor was automatically shut down when the entire platform was shut down due to a Process Logic (PLC) Control System main electrical breaker trip.	1	
11	11/3/2013- 11/14/2013	Deviation	Engine was believed to have been derated to less than 50 hp. Two NOVs were received for this instance.		2
12	1/5/2014	Breakdown	The VRU compressor was automatically shut-down due to a pressure safety low alarm.	1	
13	2/6/2014	Deviation	The vapor recovery compressor was shut-down due to a SCE Demand Response Program (Base Interruptible Power) Outage		1
14	3/26/2014	Deviation	The VRU compressor was shut-down when the entire platform was shut-down during maintenance on the Safety Alarm Program.		1
				9	6



**ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(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>4/23/2013, 14:48</u></p> <p>End <u>4/23/13, 14:53</u></p> <p>When Discovered: Date & Time</p> <p><u>4/23/2013, 14:48</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 emission of 1.53 lbs ROC</p>
<p>G. Probable Cause of Deviation</p> <p>The Vapor Recovery Compressor was shut-down accidentally when it was not put in by-pass mode while conducting safety alarm testing.</p>		<p>H. Corrective actions taken:</p> <p>Vapor recovery compressor was started back up as soon as possible. Facility operators will review Safety Alarm Testing Procedures prior to conducting future alarm testing.</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>4/28/13, 11:20</u></p> <p>End <u>4/28/13, 11:28</u></p> <p>When Discovered: Date & Time</p> <p><u>4/28/13, 11:20</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 platform was automatically shut-down due to high pressure safety alarm triggered by high pressure detected while well pressure was bled down in preparation for required well maintenance.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. The vapor recovery compressor was started back up as soon as possible after the platform shut down.</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>5/6/13, 14:30</u></p> <p>End <u>5/6/13, 19:40</u></p> <p>When Discovered: Date & Time</p> <p><u>5/6/13, 14:30</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 platform was shut-down due to fire protection system operational issues.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. The vapor recovery compressor was started back up as soon as possible after the fire protection system was back in service.</p>



**ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>5/22/13, 4:30</u> End <u>5/22/13, 6:50</u> When Discovered: Date & Time <u>5/22/13, 4:30</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: No excess emissions as production was shut in and there was no venting.</p>
<p>G. Probable Cause of Deviation The platform was automatically shut-down due to SCE power outage.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. The vapor recovery compressor was started back up as soon as possible after power was restored to the facility.</p>

<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>6/25/2013, 4:00</u> End <u>6/25/13, 4:45</u> When Discovered: Date & Time <u>6/25/2013, 4:00</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: Excess emission of 0.002 lbs ROC</p>
<p>G. Probable Cause of Deviation The Vapor Recovery Compressor was shut-down due to a broken belt drive.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. The broken belt was replaced and the unit was back in service within 45 minutes. Spare belts are kept onsite to facilitate quick repairs.</p>

<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>8/27/13, 7:05</u> End <u>8/27/13, 11:40</u> When Discovered: Date & Time <u>8/27/13, 7:05</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: No excess emissions as production was shut in and there was no venting.</p>
<p>G. Probable Cause of Deviation The vapor recovery compressor was shut-down for safety reasons after a hairline crack was discovered in the discharge manifold.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. The vapor recovery compressor discharge manifold piping hairline crack was repaired by a welder. The unit was started back up as soon as possible.</p>



**ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>9/10/13, 18:53</u> End <u>9/10/13, 18:54</u> When Discovered: Date & Time <u>9/10/13, 18:53</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: No excess emissions as production was shut in and there was no venting.</p>
<p>G. Probable Cause of Deviation The platform was automatically shut-down due to pressure safety low alarm.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. The pressure safety low alarm was reset and the vapor recovery compressor was started back up within a minute.</p>

<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>9/19/13, 15:35</u> End <u>9/19/13, 18:25</u> When Discovered: Date & Time <u>9/19/13, 15:35</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: No excess emissions as production was shut in and there was no venting.</p>
<p>G. Probable Cause of Deviation SCE Demand Response Program (Base Interruptible Power) Outage</p>		<p>H. Corrective actions taken: VCAPCD was notified of the outage. All oil and gas production was shut-in during the test.</p>

<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>10/17/13, 15:35</u> End <u>10/17/13, 15:40</u> When Discovered: Date & Time <u>10/17/13, 15:35</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: No excess emissions as production was shut in and there was no venting.</p>
<p>G. Probable Cause of Deviation VRU compressor was shut-down when an emergency platform shut-down was initiated by a Pressure Safety High (PSH) alarm triggered on the Flare Scrubber Vessel during VEE testing.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. The Flare Scrubber Vessel PSH alarm was reset to allow operators to direct produced gas to the flare in a manual mode so VEE testing can be safely conducted. Vapor recovery compressor was started back up within 5 minutes.</p>



**ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>11/4/13, 8:50</u> End <u>11/4/13, 11:15</u> When Discovered: Date & Time <u>11/4/13, 8:50</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: No excess emissions as production was shut in and there was no venting.</p>
<p>G. Probable Cause of Deviation VRU compressor was automatically shut down when the entire platform was shut down due to a Process Logic (PLC) Control System main electrical breaker trip.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. Electricians found main breaker for the PLC was tripped which had activated the automatic shut-down. Inspection also found a blown fuse for Vessel LSH Alarm, which must have caused a trip on the main breaker for the PLC.</p>

<p>A. Attachment # or Permit Condition #: VCAPCD Rule 10.A,B.</p>	<p>B. Equipment description: Portable air compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>11/3/13</u> End <u>11/14/13</u> When Discovered: Date & Time <u>11/15/13, 10:41</u></p>
<p>D. Parameters monitored: Operations</p>	<p>E. Limit Permit required</p>	<p>F. Actual: Engine was operated for seven days before being removed from the platform.</p>
<p>G. Probable Cause of Deviation Engine was believed to have been derated to less than 50 hp.</p>		<p>H. Corrective actions taken: The portable air compressor was removed from the location and will not be used by DCOR in the future.</p>

<p>A. Attachment # or Permit Condition #: CA H&S 93116.3(b)(1)(A)</p>	<p>B. Equipment description: Portable air compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>11/3/13</u> End <u>11/14/13</u> When Discovered: Date & Time <u>11/15/13, 10:41</u></p>
<p>D. Parameters monitored: Operations</p>	<p>E. Limit Permit required</p>	<p>F. Actual: Engine was operated for seven days before being removed from the platform.</p>
<p>G. Probable Cause of Deviation Engine was believed to have been derated to less than 50 hp.</p>		<p>H. Corrective actions taken: The portable air compressor was removed from the location and will not be used by DCOR in the future.</p>



**ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>1/5/14, 17:48</u> End <u>1/5/14, 17:50</u> When Discovered: Date & Time <u>1/5/14, 17:48</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: No excess emissions as production was shut in and there was no venting.</p>
<p>G. Probable Cause of Deviation VRU compressor was automatically shut-down due to a pressure safety low alarm.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. The VRU system pressure safety low alarm was re-set and the vapor recovery compressor was started back up within 2 minutes.</p>
<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>2/6/13, 14:55</u> End <u>2/6/14, 22:45</u> When Discovered: Date & Time <u>2/6/13, 14:55</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: No excess emissions as production was shut in and there was no venting.</p>
<p>G. Probable Cause of Deviation SCE Demand Response Program (Base Interruptible Power) Outage</p>		<p>H. Corrective actions taken: VCAPCD was notified of the outage. All oil and gas production was shut-in during the test.</p>
<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>3/26/14, 12:37</u> End <u>3/26/14, 12:43</u> When Discovered: Date & Time <u>3/26/14, 12:37</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: No excess emissions as production was shut in and there was no venting.</p>
<p>G. Probable Cause of Deviation VRU compressor was shut-down when the entire platform was shut-down during maintenance on the Safety Alarm Program.</p>		<p>H. Corrective actions taken: Vapor recovery compressor was started back as soon as possible after the outage, within 5 minutes.</p>

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**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(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>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<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></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 #: ATCM Engine N3</p>	<p>D. Frequency of monitoring: Daily, Annually</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: Use of CARB Diesel; Recordkeeping.</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>

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**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<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.</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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Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<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-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 reporting period.</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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Period Covered by Compliance Certification: 04/01/13 to 03/31/14
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<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 2 Section 1, 2, and 5</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 3 and 4</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>



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Period Covered by Compliance Certification: 04/01/13 to 03/31/14
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<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 3 Sections 1</p>	<p>D. Frequency of monitoring: Monthly, Annually</p>
<p>B. Description 40 CFR Part 63, Subpart ZZZZ, NESHAPS RICE MACT for Backup Utility Generator</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Monitoring of all reasons for use (i.e., loss of grid electricity or loss of stationary source's own power production).</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 2 and 3</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, "Stationary Internal Combustion Engines."</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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**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 04/01/13 to 03/31/14
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<p>A. Attachment # or Permit Condition #: Rule 50</p>	<p>D. Frequency of monitoring: Annual Visible Emission Survey</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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Period Covered by Compliance Certification: 04/01/13 to 03/31/14
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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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Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<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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Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<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 33-5 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.</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 and less than or equal to 1,000,000 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>



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Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<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
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**ANNUAL COMPLIANCE CERTIFICATION
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Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<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> 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 74.2</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> 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 74.16</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> 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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Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 61, Subpart M</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description National Emission Standard for Asbestos</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: No asbestos demolition or renovation activities took place during the period of 4/1/2013 through 3/31/2014.</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>



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Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(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>



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Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(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></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 #: 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></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 #: 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></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>



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Period Covered by Compliance Certification: 04/01/13 to 03/31/14
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 60, Subpart OOOO</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description NSPS for Crude Oil and Natural Gas Production, Transmission and Distribution</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 and VCAPCD Rules</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	7
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PLATFORM GINA DIESEL CRANE FUEL USAGE

GINA	CRANE		
	325 bhp CAT 3406B		
	Hrs.	Gal.	12 Mo. Rolling Total Gal
Jan-12	6	40	653
Feb-12	7	43	623
Mar-12	10	61	619
Apr-12	8	53	610
May-12	10	65	621
Jun-12	8	44	609
Jul-12	7	43	592
Aug-12	8	49	603
Sep-12	11	67	618
Oct-12	14	90	662
Nov-12	6	41	648
Dec-12	8	50	647
Jan-13	7	54	661
Feb-13	14	79	698
Mar-13	14	92	728
Apr-13	10	58	733
May-13	17	106	773
Jun-13	101	528	1,257
Jul-13	50	285	1,500
Aug-13	9	69	1,519
Sep-13	6	40	1,492
Oct-13	11	62	1,463
Nov-13	12	78	1,500
Dec-13	8	54	1,504
Jan-14	17	97	1,547
Feb-14	10	62	1,530
Mar-14	6	40	1,479
Crane permit limits		2,870 gal/yr	

Inspectorate
 22934 Lockness Avenue
 Torrance, California 90501 USA
 T: 310-326-4429
 F: 310-326-4470



INSPECTORATE

Certificate of Analysis

Vessel / Shore Tank : **Aeros Miscellaneous**
 Product : **Ultra Low Sulfur Diesel Fuel**
 Client Reference : **Job# 092-8392B / ID# 13-284**
 Terminal / Port / Office : **Aeros Environmental, Inc.**
 Job ID : **2013-081-01191**
 Comments : **Submitted Sample**

Sample Submitted By : **Aeros Environmental**
 Analysis Performed By : **IAC Los Angeles**
 Date Sampled : **14-Aug-2013**
 Date Reported : **26-Aug-2013**
 Submission ID : **2013-081-01191**

OCS Supply Boat Ryan T / 8-14-13		
2013-081-01191-002		Submitted
Method	Test	Result
ASTM D4052	API Gravity @ 60°F	37.8
ASTM D5453	Sulfur Content , ppm (mg/kg) / wt %	6.4 / 0.0006
ASTM D6304 Proc. A	Water Content , mass % / ppm (mg/kg)	0.0049 / 49
IAC ASTM D5291 Method A	Carbon , mass %	86.2
	Hydrogen , mass %	13.8
	Nitrogen , mass %	<0.5
IAC ASTM D5622	Total Oxygen , mass %	<0.10
ASTM D240	Gross Heat of Combustion , Mj/kg	45.970
	Unit Conversion , BTU/lb / BTU/gal	19764 / 137538

IAC Analysis performed by alternative IAC Laboratory

For Inspectorate:

Anthony Riccardi, Assistant Laboratory Manager



SAYBOLT LP
21730 S. Wilmington Avenue
Suite 201
Carson, CA 90810
310-518-4400 Telephone
310-518-4455 Facsimile

Fast To The Point

Saybolt LP

Certificate of Analysis

SC FUELS
HOPE BOWLES
3815 VINEYARD AVENUE
OXNARD, CA 93036

Report Date: 9/27/2013
Job No: 13091-00008913
Client Ref: Red ULS Diesel

Product: ULS Diesel
Location: Oxnard, CA
Vessel: ---

Test	Method	Result	Units
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Lab Number: 1300644-01
Date Sampled 9/5/2013

Sample ID: Tank #1

Total Sulfur	ASTM D-5453	6.81	ppm wt
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Lab Number: 1300644-02
Date Sampled 9/5/2013

Sample ID: Tank #2

Total Sulfur	ASTM D-5453	6.20	ppm wt
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Approved By:

Signature On File
Francine Hanby
Laboratory Manager

Issuer warrants that it has exercised due diligence and care with respect to the information and professional judgments embodied in this report. This report reflects only the findings at the time and place of inspection and testing. Issuer expressly disclaims any further indemnity of any kind. This report is not a guarantee or policy of insurance with respect to the goods or the contractual performance of any party. Any person relying upon this report should be aware that issuer's activities are carried out under their general terms and conditions.

"Precision parameters apply in the evaluation of the test results specified above. Please also refer to ASTM D3244 (except for analysis of RFG) and IP 367 with respect to the utilization of the test data to determine conformance with specifications."

Platforms Gina and Gilda Fuel Usage (in Gallons)

Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 75%
Apr-12	12,926	3,232	9,695
May-12	15,400	3,850	11,550
Jun-12	14,360	3,590	10,770
Jul-12	14,440	3,610	10,830
Aug-12	15,000	3,750	11,250
Sep-12	13,850	3,463	10,388
Oct-12	14,200	3,550	10,650
Nov-12	13,576	3,394	10,182
Dec-12	12,250	3,063	9,188
Jan-13	9,100	2,275	6,825
Feb-13	8,400	2,100	6,300
Mar-13	10,200	2,550	7,650
Apr-13	8,875	2,219	6,656
May-13	10,592	2,648	7,944
Jun-13	11,400	2,850	8,550
Jul-13	11,770	2,943	8,828
Aug-13	12,976	3,244	9,732
Sep-13	11,475	2,869	8,606
Oct-13	12,600	3,150	9,450
Nov-13	12,250	3,063	9,188
Dec-13	11,850	2,963	8,888
Jan-14	11,550	2,888	8,663
Feb-14	9,325	2,331	6,994
Mar-14	9,390	2,348	7,043
2013 Total	32,872	98,616	

Supply Boat Fuel Usage

	Gina		Gilda	
	Mains	Aux	Mains	Aux
Apr-12	71	3	213	9
May-12	1785	74	5354	223
Jun-12	742	31	2225	93
Jul-12	2170	90	6510	271
Aug-12	985	10	2956	123
Sep-12	327	14	981	41
Oct-12	0	0	0	0
Nov-12	0	0	0	0
Dec-12	357	31	1070	93
Jan-13	0	0	0	0
Feb-13	875	36	2615	109
Mar-13	656	27	1967	82
Apr-13	1433	60	4298	179
May-13	1707	71	5122	213
Jun-13	2618	109	7854	327
Jul-13	866	36	2598	108
Aug-13	1239	12	3718	155
Sep-13	1521	63	4562	190
Oct-13	2089	87	6266	261
Nov-13	1895	79	5686	237
Dec-13	1659	69	4976	207
Jan-14	1918	80	5755	240
Feb-14	2086	87	6259	261
Mar-14	2280	95	6841	285
2013 Total	16,557	651	49,661	2,069

Rolling 12 Mo Total	
Gina	Gilda
41,151	120,886
43,709	127,608
44,617	133,055
48,043	142,198
49,586	147,023
51,642	148,835
52,043	150,705
50,609	151,692
50,751	151,902
51,990	144,910
48,265	140,244
51,229	140,210
49,198	141,426
46,512	137,578
47,046	141,221
45,020	135,144
45,546	134,420
45,420	136,370
49,009	141,697
50,205	146,625
53,064	150,346
56,247	158,178
59,637	162,668
57,477	167,138

Platform Gina Permitted Fuel Total: 84,400
 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	NOx	PM	SOx	CO		ROC	NOx	PM	SOx	CO	
	TPY	TPY	TPY	TPY	TPY		TPY	TPY	TPY	TPY	TPY	
Apr-12	0.68	11.54	0.69	0.15	2.10		2.00	33.91	2.02	0.45	6.17	
May-12	0.72	12.26	0.73	0.16	2.23		2.12	35.79	2.14	0.48	6.51	
Jun-12	0.74	12.52	0.75	0.17	2.28		2.21	37.32	2.23	0.50	6.79	
Jul-12	0.80	13.48	0.80	0.18	2.45		2.36	39.89	2.38	0.53	7.25	
Aug-12	0.82	13.91	0.83	0.19	2.53		2.44	41.24	2.46	0.55	7.50	
Sep-12	0.86	14.49	0.87	0.19	2.63		2.47	41.75	2.49	0.56	7.59	
Oct-12	0.86	14.60	0.87	0.20	2.65		2.50	42.27	2.52	0.57	7.69	
Nov-12	0.84	14.20	0.85	0.19	2.58		2.51	42.55	2.54	0.57	7.74	
Dec-12	0.84	14.24	0.85	0.19	2.59		2.52	42.61	2.54	0.57	7.75	
Jan-13	0.86	14.58	0.87	0.19	2.65		2.40	40.65	2.43	0.54	7.39	
Feb-13	0.80	13.54	0.81	0.18	2.46		2.32	39.34	2.35	0.53	7.15	
Mar-13	0.85	14.37	0.86	0.19	2.61		2.32	39.33	2.35	0.53	7.15	
Apr-13	0.82	13.80	0.82	0.18	2.51		2.34	39.67	2.37	0.53	7.21	
May-13	0.77	13.05	0.78	0.17	2.37		2.28	38.59	2.30	0.52	7.02	
Jun-13	0.78	13.20	0.79	0.18	2.40		2.34	39.61	2.37	0.53	7.20	
Jul-13	0.75	12.63	0.75	0.17	2.30		2.24	37.91	2.26	0.51	6.89	
Aug-13	0.75	12.78	0.76	0.17	2.32		2.23	37.70	2.25	0.50	6.86	
Sep-13	0.75	12.74	0.76	0.17	2.32		2.26	38.25	2.28	0.51	6.95	
Oct-13	0.81	13.75	0.82	0.18	2.50		2.35	39.75	2.37	0.53	7.23	
Nov-13	0.83	14.08	0.84	0.19	2.56		2.43	41.13	2.46	0.55	7.48	
Dec-13	0.88	14.88	0.89	0.20	2.71		2.49	42.17	2.52	0.56	7.67	
Jan-14	0.93	15.78	0.94	0.21	2.87		2.62	44.37	2.65	0.59	8.07	
Feb-14	0.99	16.73	1.00	0.22	3.04		2.70	45.63	2.72	0.61	8.30	
Mar-14	0.95	16.12	0.96	0.22	2.93		2.77	46.88	2.80	0.63	8.52	

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	
Plt Gina	Plt Gilda
1.40	4.20
23.68	71.07
1.41	4.24
0.31	0.95
4.31	12.92

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-12	0.00	3.2	1.58	1.58
Feb-12	0.10	3.2	1.60	1.60
Mar-12	0.10	0.8	0.38	0.38
Apr-12	0.10	0.8	0.38	0.38
May-12	0.00	0.7	0.33	0.33
Jun-12	0.00	0.7	0.33	0.33
Jul-12	1.90	2.6	1.28	1.28
Aug-12	2.25	4.8	2.38	2.38
Sep-12	0.15	4.9	2.43	2.43
Oct-12	0.00	4.8	2.38	2.38
Nov-12	0.00	4.7	2.33	2.33
Dec-12	0.05	4.7	2.33	2.33
Jan-13	0.10	4.8	2.38	2.38
Feb-13	0.10	4.8	2.38	2.38
Mar-13	0.10	4.8	2.38	2.38
Apr-13	0.00	4.7	2.33	2.33
May-13	0.00	4.7	2.33	2.33
Jun-13	0.00	4.7	2.33	2.33
Jul-13	0.00	2.8	1.38	1.38
Aug-13	0.00	0.5	0.25	0.25
Sep-13	0.00	0.4	0.18	0.18
Oct-13	0.00	0.4	0.18	0.18
Nov-13	0.00	0.4	0.18	0.18
Dec-13	0.00	0.3	0.15	0.15
Jan-14	0.00	0.2	0.10	0.10
Feb-14	0.00	0.1	0.05	0.05
Mar-14	0.00	0.0	0.00	0.00

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

**PLATFORM GINA
FLARE USAGE**

MONTH	Pilot SCF	Planned MCF	Unplanned MCF	12 Month 'Rolling' Total	
				Pilot MMSCF	Planned MMSCF
Jan-12		0.0	0.0	0.00	0.155
Feb-12		0.0	20.0	0.00	0.155
Mar-12		2.0	0.0	0.00	0.157
Apr-12		0.0	0.0	0.00	0.156
May-12		92.0	0.0	0.00	0.098
Jun-12		3.0	0.0	0.00	0.099
Jul-12		0.0	1.0	0.00	0.099
Aug-12		0.0	0.0	0.00	0.099
Sep-12		3.0	4.0	0.00	0.102
Oct-12		4.0	0.0	0.00	0.106
Nov-12		0.0	0.0	0.00	0.106
Dec-12		0.0	0.0	0.00	0.104
Jan-13		0.0	0.0	0.00	0.104
Feb-13		0.0	0.0	0.00	0.104
Mar-13		0.0	537.0	0.00	0.102
Apr-13		29.0	58.0	0.00	0.131
May-13		103.0	6.0	0.00	0.142
Jun-13		2.0	0.0	0.00	0.141
Jul-13		2.0	0.0	0.00	0.143
Aug-13		0.0	0.0	0.00	0.143
Sep-13		0.0	0.0	0.00	0.140
Oct-13		1.0	0.0	0.00	0.137
Nov-13		0.0	0.0	0.00	0.137
Dec-13		0.0	0.0	0.00	0.137
Jan-14		1.0	2.0	0.00	0.138
Feb-14		0.0	0.0	0.00	0.138
Mar-14		0.0	0.0	0.00	0.138

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

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

	HOURS		HOURS	
	Non-Emergency	Emergency	Monthly Total	Annual Total
Jan-13	0.9	0.0	0.9	1.2
Feb-13	0.9	0.0	0.9	2.1
Mar-13	1.0	0.0	1.0	3.1
Apr-13	0.9	0.0	0.9	4.0
May-13	0.9	1.6	2.5	6.5
Jun-13	1.0	0.0	1.0	7.5
Jul-13	1.3	0.0	1.3	8.8
Aug-13	0.6	0.0	0.6	9.4
Sep-13	1.0	1.3	2.3	11.7
Oct-13	0.8	0.0	0.8	12.5
Nov-13	1.0	0.0	1.0	13.5
Dec-13	1.1	0.0	1.1	14.6
Jan-14	1.2	0.0	1.2	1.2
Feb-14	0.8	3.7	4.5	5.7
Mar-14	0.8	0.0	0.8	6.5

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
17-Oct-13	3:30-3:33	Jesse Vanhoy	Seaking Crane	No Visible Emissions
17-Oct-13	3:45-3:48	Jesse Vanhoy	Standby Generator	No Visible Emissions
17-Oct-13	3:35-3:38	Jesse Vanhoy	Flare	No Visible Emissions



STATIONARY IC EMISSION TEST

PREPARED FOR:



DATE:	October 17, 2013	PLATFORM:	GINA
PERMIT TO OPERATE:	1491	EQUIPMENT:	SEAKING CRANE
FIELD TECHNICIAN:	JESSE VANHOY	MANUFACTURER:	CATERPILLAR
TEST INSTRUMENT:	ECOM-AC PLUS 8258	MODEL NUMBER :	3406
PRE-TEST CALIBRATION:	10/14/2013	FUEL TYPE:	DIESEL #2
POST-TEST CALIBRATION:	10/21/2013		

PRE-CAT VALUES

	RUN 1	RUN 2	RUN 3	AVERAGE	TEMP
RPM	1745	1745	1745	1745	508°F
O2	16.2	16.2	16.2	16.2	
CO	388	382	383	384	
TOTAL NOX	330	333	332	332	
CO corrected to %15 O2	487	480	481	482	
NX corrected to %15 O2	414	418	417	416	

Pressure Drop (inches of water column)	CAT EFF.:	92.8%
2"	LIMIT	≥70%

POST-CAT VALUES

	RUN 1	RUN 2	RUN 3	AVERAGE	
RPM	1745	1745	1745	1745	
O2	16.3	16.2	16.2	16.2	
CO	27	26	30	28	
TOTAL NOX	337	353	341	344	LIMIT*
CO corrected to %15 O2	35	33	38	35	49
NX corrected to %15 O2	432	443	428	434	

COMMENTS: A limit of 49 ppm CO is required only if that option is chosen over the 70% reduction option.

Platform Gina Flaring Events 142 MMBtu/hr Flare						
Flare Date	MCF flared	H2S ppm	Sweet Gas Emission factor lb/MMCF	SO2 Emissions lb	Sour Gas Emission factor lb/MMCF	SO2 Emissions lb
5-Mar-13	80	1	0.17	0.014	0.00	0.000
6-Mar-13	165	0	0.06	0.010	0.00	0.000
7-Mar-13	222	0	0.06	0.013	0.00	0.000
8-Mar-13	70	0	0.06	0.004	0.00	0.000
3-Apr-13	47	0	0.06	0.003	0.00	0.000
5-Apr-13	13	1.5	0.25	0.003	0.00	0.000
23-Apr-13	16	0	0.06	0.001	0.00	0.000
29-Apr-13	11	0	0.06	0.001	0.00	0.000
4-May-13	35	0	0.06	0.002	0.00	0.000
4-May-13	18	0	0.06	0.001	0.00	0.000
4-May-13	16	0	0.06	0.001	0.00	0.000
5-May-13	34	0	0.06	0.002	0.00	0.000
22-May-13	3	0	0.06	0.000	0.00	0.000
22-May-13	3	0	0.06	0.000	0.00	0.000
2-Jun-13	2	0	0.06	0.000	0.00	0.000
28-Jul-13	2	0	0.06	0.000	0.00	0.000
17-Oct-13	1	18	3.04	0.003	0.00	0.000
11-Jan-14	2	10	1.69	0.003	0.00	0.000
14-Jan-14	1	0	0.06	0.000	0.00	0.000
TOTAL	741.0			0.061		0.000
TOTAL SULFUR EMISSIONS					0.061	lb SO2
					0.00003	ton 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, Rule 54.B1, 54.B2

PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		May-13	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS	
5/4/13	07:00	11:45	35	0	SENDING GAS LINE SMART PIG.	PLANNED	R.B.	
5/4/13	15:00	17:20	18	0	SENDING GAS LINE BRUSH PIG.	PLANNED	R.B.	
5/4/13	17:40	19:45	16	0	SENDING GAS LINE CUP PIG.	PLANNED	R.B.	
5/5/13	06:20	10:50	34	0	SENDING GAS LINE SMART PIG.	PLANNED	R.B.	
5/22/13	07:45	08:10	3	0	MOSF GAS-LINE SHUT IN.	UNPLANNED	R.B.	
5/22/13	15:15	15:45	3	0	MOSF SHUT DOWN, HAD TO CHANGE CARD.	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.



Letter of Conformance

May 5, 2014

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to
DCOR FROM 4/1/2013- 3/31/2014

Was in compliance with South Coast Air Quality Management District requirements for Ventura and Santa Barbara Counties. The test Results meet ASTM D-5453 and are Typical of all CARB Ultra Low Sulfur Dyed Diesel Fuel sold by Maxum 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
SC Fuels
Oxnard Division
Office (805) 299-1219
bowlesh@scfuels.com



Letter of Conformance

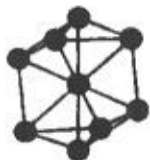
May 12, 2014

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to
DCOR LLC FOR M/V RYAN T, LUKE, PATRICK, & CAPT T LE FROM 4/1/2013-3/31/2014

Was in compliance with South Coast Air Quality Management District requirements for Ventura and Santa Barbara Counties. The test Results meet ASTM D-5453 and are Typical of all CARB Ultra Low Sulfur Dyed Diesel Fuel sold by Maxum 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.

Mark Mason

General Manager
Maxum Petroleum
California Division
Office (310) 356-2702



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 (H ₂ O = 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 H ₂ O 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

