



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

May 6, 2015

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

RE: Annual Compliance Certification Report  
Platform Gina, PTO 1491

Dear Mr. Searcy:

DCOR, LLC, submits the enclosed Annual Compliance Verification Report for Platform Gina as required by Part 70 Permit to Operate 1491. This report covers the time period of April 1, 2014 through March 31, 2015.

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

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**DCOR, LLC**

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**2014 ANNUAL COMPLIANCE  
CERTIFICATION REPORT  
for the time period 4/1/2014-3/31/2015**

**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**

**DCOR, LLC – PLATFORM GINA – PTO 1491**

**2014**

**COMPLIANCE VERIFICATION REPORT  
For the time period 4/1/2014 – 3/31/2015**

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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: Bob Garcia, Vice President California Offshore Operations	Date:  5.6.15
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Time Period Covered by Compliance Certification  04 / 01 / 2014 (MM/DD/YY) to 03 / 31 / 2015 (MM/DD/YY)
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## 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
71.1.N1	Rules 71.1.B.1.a, 74.10	<ul style="list-style-type: none"> <li>•Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable</li> <li>•Verbal notice of maintenance activities</li> <li>•Rule 74.10 inspections</li> <li>•Annual compliance certification including verification that tanks are equipped with a vapor recovery system</li> </ul>	<ul style="list-style-type: none"> <li>•Records of quarterly inspections and tank maintenance activities</li> <li>•Rule 74.10 records</li> </ul>	None	None	
71.1.N6	Rules 71.1.B.3, 71.1.D.1.e, 74.10	<ul style="list-style-type: none"> <li>•Annual compliance certification including verification of the integrity of the roof and pressure-vacuum relief valve</li> <li>•Rule 74.10 inspections</li> </ul>	<ul style="list-style-type: none"> <li>•Records of number of days the tank has stored or held crude oil during the maintenance operation, location of the tank relative to a tank battery, and whether tank was connected to vapor recovery</li> <li>•Records to show integrity of roof and PV valves for tanks not permanently located at facility</li> <li>•Rule 74.10 records</li> </ul>	None	None	

### I.c.1. Specific Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.4 N1	Rules 71.4.B.2 and 74.10	<ul style="list-style-type: none"> <li>Verbal notice of maintenance operations</li> <li>Rule 74.10 inspections</li> <li>Annual compliance certification including verifying the integrity of the cover</li> </ul>	<ul style="list-style-type: none"> <li>Records of maintenance</li> <li>Rule 74.10 records</li> </ul>	None	None	
74.9N9	Rule 74.9.D.9	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Routine surveillance to ensure diesel-fired engine is used to power cranes and welding equipment only</li> </ul>	<ul style="list-style-type: none"> <li>Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location</li> </ul>	None	None	
ATCM Engine N3	ATCM for Stationary Compression Ignition Engines – OCS	<ul style="list-style-type: none"> <li>Fuel type records</li> <li>Fuel use records</li> </ul>	<ul style="list-style-type: none"> <li>Fuel type records</li> <li>Fuel use records</li> </ul>	None	None	Not federally enforceable
40CFR63ZZZN3	RICE MACT for emergency diesel engines – oil change and inspections	<ul style="list-style-type: none"> <li>Maintenance records</li> <li>Use non-resettable hour meter</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintenance records</li> <li>Hours of operation records</li> </ul>	None	None	
40CFR63ZZZN5	RICE MACT for non-emergency diesel engines > 300 HP & ≤ 500 HP, CO ppm limit	<ul style="list-style-type: none"> <li>Initial CO source testing</li> <li>Maintain catalyst pressure / temperature</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Initial CO testing records</li> </ul>	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"> <li>Annual compliance certification</li> <li>Monthly records of throughput and consumption</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records</li> </ul>	None	None	
PO1491PC1 - Condition No. 2	Rule 29 Maximum Number of Oil Wells	<ul style="list-style-type: none"> <li>Annual compliance certification</li> </ul>	None	None	None	
PO1491PC1 - Condition No. 3	Rule 26 BACT Well	<ul style="list-style-type: none"> <li>Annual compliance certification</li> </ul>	None	None	None	
PO1491PC1 - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	<ul style="list-style-type: none"> <li>Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery</li> <li>Annual compliance certification</li> </ul>	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"> <li>Diesel fuel consumption for boats servicing Platforms Gina and Gilda</li> <li>Monthly calculations of emissions (boats)</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of diesel fuel consumption</li> <li>Monthly calculations of emissions (boats)</li> </ul>	None	None	
PO1491PC1 - Condition No. 6	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of crew boat operation</li> <li>Maintain a log of boats and engines</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of crew boat operation</li> <li>Maintain a log of crew boats and engines</li> </ul>	None	None	
PO1491PC1 - Condition No. 7	Rule 29 Two Work Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of work boat operation</li> <li>Maintain a log of boats and engines</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of work boat operation</li> <li>Maintain a log of work boats and engines</li> </ul>	None	None	
PO1491PC1 - Condition No. 8	Rule 29 Boom Boat Fuel Limit	<ul style="list-style-type: none"> <li>Gasoline consumption at boom boats</li> <li>Monthly gasoline consumption records</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly gasoline consumption at boom boats</li> </ul>	None	None	
PO1491PC1 - Condition No. 9	Rules 23 and 29 Solvent Recordkeeping	<ul style="list-style-type: none"> <li>Maintain a list of exempt solvents</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a list of exempt solvents</li> </ul>	None	None	
PO1491PC2 - Condition Nos. 1, 2, and 5	Rule 29 Flare Fuel Consumption	<ul style="list-style-type: none"> <li>Fuel consumption</li> <li>Identify emergency vs. non-emergency usage</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of fuel consumption</li> </ul>	None	None	
PO1491PC2 - Condition Nos. 3 and 4	Rules 71.1 Flare Ignition System Operation	<ul style="list-style-type: none"> <li>Monthly tests of flare's ignition system</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Records of ignition system</li> <li>Maintenance records</li> </ul>	None	None	



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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO149JPC3 - Condition No. 1	Rules 26 and 74.9 200 hours per year backup utility generator operation	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Monthly records of backup utility generator hours of operation</li> </ul>	<ul style="list-style-type: none"> <li>•Hours of operation log (non-resettable meter) differentiating non-emergency use and emergency use</li> <li>•Monthly and twelve month rolling records of hours of operation</li> </ul>	None	None	
PO149JPC3 - Condition Nos. 2 and 3	Rule 74.9 200 hours per year / emergency use exemptions	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Recordkeeping</li> </ul>	<ul style="list-style-type: none"> <li>•Hours of operation log (non-resettable meter)</li> <li>•Monthly and twelve month rolling records of hours of operation</li> </ul>	None	None	

### 1.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"> <li>• Routine surveillance</li> <li>• Visual inspections</li> <li>• Annual compliance certification, including a formal survey</li> <li>• Opacity readings upon request</li> <li>• Notification required for uncorrectable visible emissions</li> </ul>	<ul style="list-style-type: none"> <li>• All occurrences of visible emissions for periods &gt; 3min in any one hour</li> <li>• Annual formal survey of all emissions units</li> </ul>	None	<ul style="list-style-type: none"> <li>• Opacity - EPA Method 9</li> </ul>	
54.B.1 (OCS)	Rule 54.B.1	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Identify planned vs. unplanned flaring event</li> <li>• Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event</li> <li>• Upon request, source test for sulfur compounds at point of discharge</li> </ul>	<ul style="list-style-type: none"> <li>• Representative fuel analysis or exhaust analysis and compliance demonstration</li> <li>• Flare records</li> </ul>	None	<ul style="list-style-type: none"> <li>• Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-941, as appropriate</li> </ul>	
54.B.2 (OCS)	Rule 54.B.2	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Identify planned vs. unplanned flaring event</li> <li>• Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event</li> <li>• Determine ground or sea level concentrations of SO<sub>2</sub> upon request</li> <li>• Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>• Representative fuel analysis or exhaust analysis and modeling data or other compliance demonstration</li> <li>• Flare records</li> </ul>	None	<ul style="list-style-type: none"> <li>• SO<sub>2</sub> - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H<sub>2</sub>S and SO<sub>2</sub> (July 20, 1994)</li> </ul>	
57.1	Rule 57.1	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> </ul>	None	None	None	<ul style="list-style-type: none"> <li>• Not required based on District analysis</li> </ul>
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• None for PUC-quality gas</li> <li>• Annual test for non PUC-quality gas (submit with annual compliance certification)</li> </ul>	<ul style="list-style-type: none"> <li>• Annual fuel gas analysis for non PUC-quality gas</li> </ul>	None	<ul style="list-style-type: none"> <li>• SCAQMD Method 307-94</li> </ul>	
64.B.2	Rule 64.B.2	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)</li> </ul>	<ul style="list-style-type: none"> <li>• Fuel supplier's certification, or fuel test per each delivery</li> </ul>	None	<ul style="list-style-type: none"> <li>• ASTM Method D4294-83 or D2622-87</li> </ul>	

### I.c.3. General Applicable Requirements (Continued)

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

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

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

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

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

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

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SECTION	2
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**PTO 1491: Platform Gina**

Reporting Period: April 1, 2014 through March 31, 2015

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

There were no excess emissions.

**Excess Emissions**

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



**ANNUAL COMPLIANCE CERTIFICATION  
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 04/01/14 to 03/31/15  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>4/23/14, 10:15</u></p> <p>End <u>4/23/14, 10:30</u></p> <p>When Discovered: Date &amp; Time <u>4/23/14, 10:15</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 there was no venting.</p>
<p>G. Probable Cause of Deviation</p> <p>The platform was automatically shut-down when the entire platform was accidentally shut down by a Process Logic Control (PLC) system electrical breaker trip.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. Vapor recovery compressor was started back up within 15 minutes of facility shut-down.</p>

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>9/18/14, 15:56</u></p> <p>End <u>9/19/14, 16:35</u></p> <p>When Discovered: Date &amp; Time <u>9/18/14, 15:56</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 Pressure Safety High (PSH) alarm on the gas pipeline to shore. The Gas Company equipment that operates the pipeline shut-down valve at DCOR's MOSF facility had malfunctioned.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. Vapor recovery compressor was started back up within one hour of facility shut-down.</p>

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>10/22/14, 6:20</u></p> <p>End <u>10/22/14, 19:00</u></p> <p>When Discovered: Date &amp; Time <u>10/22/14, 6:20</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 there was no venting.</p>
<p>G. Probable Cause of Deviation</p> <p>The vapor recovery compressor was shut-down due to a main shaft seal failure.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. A spare vapor recovery compressor was put in service the same day. Facility operators immediately took steps to prevent venting to atmosphere.</p>





**ANNUAL COMPLIANCE CERTIFICATION  
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 04/01/14 to 03/31/15  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>10/27/14, 8:15</u></p> <p>End <u>10/27/14, 14:00</u></p> <p>When Discovered: Date &amp; Time <u>10/27/14, 8:15</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 there was no venting.</p>
<p>G. Probable Cause of Deviation</p> <p>The vapor recovery compressor was shut-down due to a vapor leak detected during the morning operator inspection rounds.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. A gasket on compressor discharge suction was replaced and unit fully inspected. Facility operators immediately took steps to prevent venting to atmosphere.</p>

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>11/20/14, 15:05</u></p> <p>End <u>11/20/14, 15:20</u></p> <p>When Discovered: Date &amp; Time <u>11/20/14, 15:05</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 when Emergency Shut-Down (ESD) button was accidentally hit with piece of equipment during work-over rig move.</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.</p>

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>12/2/14, 8:30</u></p> <p>End <u>12/2/14, 12:10</u></p> <p>When Discovered: Date &amp; Time <u>12/2/14, 8:30</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 automatically shut-down due to Level Safety High (LSH) alarm on the gas treatment system scrubber that caused the Process Logic Control (PLC) system breaker to trip.</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 once the LSH alarm problem was identified.</p>



**ANNUAL COMPLIANCE CERTIFICATION  
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 04/01/14 to 03/31/15  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>12/12/14, 4:00</u></p> <p>End <u>12/12/14, 5:40</u></p> <p>When Discovered: Date &amp; Time <u>12/12/14, 4:00</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 vapor recovery compressor was shut down due to a loss of power at the facility caused by a trip of the facility main electrical breaker.</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 once power was restored.</p>
<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>1/10/15, 9:30</u></p> <p>End <u>1/10/15, 11:15</u></p> <p>When Discovered: Date &amp; Time <u>1/10/15, 9:30</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 there was no venting.</p>
<p>G. Probable Cause of Deviation</p> <p>The vapor recovery compressor was shut down due to leaking oil seal on compressor crankshaft.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. Facility operators immediately took steps to prevent venting to atmosphere. Compressor was subsequently replaced with back-up vapor recovery compressor.</p>
<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>3/6/15, 12:50</u></p> <p>End <u>3/6/15, 13:10</u></p> <p>When Discovered: Date &amp; Time <u>3/6/15, 12:50</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>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 hydrogen sulfide (H2S) alarm triggered when WEMCO PSVR was hit by a heavy tarp. Automatic shut-down is required as federally mandated safety precaution.</p>		<p>H. Corrective actions taken:</p> <p>Breakdown was reported to the District. The PSVR re-seated itself and vapor recovery was started back up within 20 minutes.</p>

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**ANNUAL COMPLIANCE CERTIFICATION  
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 04/01/14 to 03/31/15  
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<p>A. Attachment # or Permit Condition #: <b>Attachment 71.1N1</b></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 #: <b>Attachment 71.1N6</b></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 #: <b>Attachment 71.4N1</b></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>



**ANNUAL COMPLIANCE CERTIFICATION  
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Period Covered by Compliance Certification: 04/01/14 to 03/31/15  
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<p>A. Attachment # or Permit Condition #: <b>Attachment 74.9N9</b></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 #: <b>ATCM Engine N3</b></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> 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: 04/01/14 to 03/31/15  
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<p>A. Attachment # or Permit Condition #: <b>PTO 1491 Permit Condition 1 Item 1</b></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 #: <b>PTO 1491 Permit Condition 1 Item 2</b></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 #: <b>PTO 1491 Permit Condition 1 Item 3</b></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 #: <b>PTO 1491 Permit Condition 1 Item 4</b></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 #: <b>PTO 1491 Permit Condition 1 Item 5</b></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 #: <b>PTO 1491 Condition 1 Item 6</b></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: 04/01/14 to 03/31/15  
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<p>A. Attachment # or Permit Condition #: <b>PTO 1491 Condition 1 Item 7</b></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 #: <b>PTO 1491 Permit Condition 1 Item 8</b></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 #: <b>PTO 1491 Permit Condition 1 Item 9</b></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: 04/01/14 to 03/31/15  
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<p>A. Attachment # or Permit Condition #: <b>PTO 1491 Condition 2 Section 1, 2, and 5</b></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 #: <b>PTO 1491 Condition 2 Sections 3 and 4</b></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: 04/01/14 to 03/31/15  
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<p>A. Attachment # or Permit Condition #: <b>PTO 1491 Condition 3 Sections 1</b></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 #: <b>PTO 1491 Condition 3 Sections 2 and 3</b></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  
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Period Covered by Compliance Certification: 04/01/14 to 03/31/15  
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<p>A. Attachment # or Permit Condition #: <b>Rule 50</b></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 #: <b>Rule 54.B.1</b></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 #: <b>Rule 54.B.2</b></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: 04/01/14 to 03/31/15  
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<p>A. Attachment # or Permit Condition #: <b>Rule 57.1</b></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 #: <b>Rule 64.B1</b></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 #: <b>Rule 64.B2</b></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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(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Attachment 71.1.C</b></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></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>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 #: <b>Rule 71.4.B1</b></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></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 #: <b>Rule 71.4.B3</b></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></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: 04/01/14 to 03/31/15  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 74.6</b></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 #: <b>Rule 74.10</b></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 #: <b>Rule 74.11.1</b></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>





Ventura County  
Air Pollution  
Control District

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Period Covered by Compliance Certification: 04/01/14 to 03/31/15  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 74.22</b></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: 04/01/14 to 03/31/15  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 74.1</b></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 #: <b>Rule 74.2</b></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 #: <b>Rule 74.16</b></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>



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Air Pollution  
Control District

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Period Covered by Compliance Certification: 04/01/14 to 03/31/15  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>40 CFR Part 61, Subpart M</b></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 4/1/2014 through 3/31/2015.</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: 04/01/14 to 03/31/15  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Part 70 General</b></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 #: <b>PO General</b></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  
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Period Covered by Compliance Certification: 04/01/14 to 03/31/15  
(MM/DD/YY) (MM/DD/YY)

A. Attachment # or Permit Condition #: <b>40 CFR Part 55</b>	D. Frequency of monitoring: Annual Compliance Certification
B. Description  Outer Continental Shelf Air Regulations	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A
C. Method of monitoring:  Compliance with Permit to Operate 1491	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

A. Attachment # or Permit Condition #: <b>40 CFR Part 68</b>	D. Frequency of monitoring: Annual Compliance Certification
B. Description  Accidental Release Prevention and Risk Management Plans	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A
C. Method of monitoring:  Compliance with Permit to Operate 1491	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

A. Attachment # or Permit Condition #: <b>40 CFR Part 82</b>	D. Frequency of monitoring: Annual Compliance Certification
B. Description  Protection of Stratospheric Ozone	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable.  N/A
C. Method of monitoring:  Compliance with Permit to Operate 1491	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



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04/01/14 to 03/31/15  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>40 CFR Part 60, Subpart OOOO</b></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
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
Apr-14	5	38	1,459
May-14	10	59	1,412
Jun-14	15	90	974
Jul-14	12	76	765
Aug-14	19	152	848
Sep-14	28	224	1,032
Oct-14	12	63	1,033
Nov-14	92	529	1,484
Dec-14	17	97	1,527
Jan-15	24	162	1,592
Feb-15	6	40	1,569
Mar-15	12	81	1,610
Crane permit limits			
		2,870 gal/yr	

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



**INSPECTORATE**

# Certificate of Analysis

**Vessel / Shore Tank :** Aeros Environmental Inc.  
**Product :** Marine Diesel Oil  
**Client Reference :** 092-8831B  
 Terminal / Port / Office : Aeros Environmental Inc.  
 Job ID : 2014-081-01128  
 Comments :

Sample Submitted By : Aeros Environmental, Inc.  
 Analysis Performed By : IAC Los Angeles  
 Date Sampled : 18-Aug-2014  
 Date Reported : 25-Aug-2014  
 Submission ID : 2014-081-01128

DCOR,LLC / CREW BOAT RYAN T / MAIN ENGINES / 8-12-14		
2014-081-01128-002		Submitted
Method	Test	Result
ASTM D4052	API Gravity @ 60 °F	37.8
ASTM D5453	Sulfur Content , ppm (mg/kg) / wt %	12 / 0.0012
ASTM D6304 Proc. A	Water Content , mass % / ppm (mg/kg)	0.0069 / 69
ASTM D240	Gross Heat of Combustion , Mj/kg	46.005
	Unit Conversion , BTU/lb / lb/gal	19779 / 137643
IAC ASTM D5291 Method A	Carbon , mass %	86.4
	Hydrogen , mass %	13.6
	Nitrogen , mass %	<0.8
IAC ASTM D5622	Total Oxygen , mass %	<0.10

IAC Analysis performed by alternative IAC laboratory.

For Inspectorate:

Lynnae Steele-Jones, Laboratory Manager

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

### Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 75%
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
Apr-14	6,805	1,701	5,104
May-14	5,803	1,451	4,352
Jun-14	10,153	2,538	7,615
Jul-14	13,206	3,302	9,905
Aug-14	9,075	2,269	6,806
Sep-14	12,300	3,075	9,225
Oct-14	14,685	3,671	11,014
Nov-14	14,000	3,500	10,500
Dec-14	14,850	3,713	11,138
Jan-15	14,400	3,600	10,800
Feb-15	11,850	2,963	8,888
Mar-15	14,825	3,706	11,119
<b>2014 Total</b>	<b>32,786</b>	<b>98,357</b>	

### Supply Boat Fuel Usage

	Gina		Gilda	
	Mains	Aux	Mains	Aux
Apr-13	1,433	60	4,298	179
May-13	1,707	71	5,122	213
Jun-13	2,618	109	7,854	327
Jul-13	866	36	2,598	108
Aug-13	1,239	12	3,718	155
Sep-13	1,521	63	4,562	190
Oct-13	2,089	87	6,266	261
Nov-13	1,895	79	5,686	237
Dec-13	1,659	69	4,976	207
Jan-14	1,918	80	5,755	240
Feb-14	2,086	87	6,259	261
Mar-14	2,280	95	6,841	285
Apr-14	1,880	78	5,641	235
May-14	2,957	123	8,872	370
Jun-14	3,010	125	9,030	376
Jul-14	1,925	80	5,774	241
Aug-14	1,399	58	4,197	175
Sep-14	5,264	219	9,745	406
Oct-14	2,075	86	6,222	259
Nov-14	3,652	152	10,956	457
Dec-14	3,674	153	11,023	459
Jan-15	3,178	132	9,535	397
Feb-15	2,619	109	7,856	327
Mar-15	396	17	1,188	50
<b>2014 Total</b>	<b>32,122</b>	<b>1,338</b>	<b>90,316</b>	<b>3,763</b>

	Rolling 12 Mo Total	
	Gina	Gilda
Apr-13	49,198	141,426
May-13	46,512	137,578
Jun-13	47,046	141,221
Jul-13	45,020	135,144
Aug-13	45,546	134,420
Sep-13	45,420	136,370
Oct-13	49,009	141,697
Nov-13	50,205	146,625
Dec-13	53,064	150,346
Jan-14	56,247	158,178
Feb-14	59,637	162,668
Mar-14	57,477	167,138
Apr-14	58,244	166,985
May-14	58,895	167,299
Jun-14	60,175	167,589
Jul-14	61,234	171,975
Aug-14	59,971	169,548
Sep-14	64,618	175,566
Oct-14	65,475	177,084
Nov-14	68,147	183,886
Dec-14	70,163	192,435
Jan-15	74,432	198,510
Feb-15	75,727	202,067
Mar-15	72,862	200,255

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 TPY	NOx TPY	PM TPY	SOx TPY	CO TPY	ROC TPY	NOx TPY	PM TPY	SOx TPY	CO TPY
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
Apr-14	0.97	16.34	0.98	0.22	2.97	2.77	46.84	2.80	0.63	8.52
May-14	0.98	16.52	0.99	0.22	3.00	2.77	46.93	2.80	0.63	8.53
Jun-14	1.00	16.88	1.01	0.23	3.07	2.78	47.01	2.81	0.63	8.55
Jul-14	1.01	17.18	1.03	0.23	3.12	2.85	48.24	2.88	0.64	8.77
Aug-14	0.99	16.82	1.00	0.22	3.06	2.81	47.56	2.84	0.64	8.65
Sep-14	1.07	18.13	1.08	0.24	3.30	2.91	49.25	2.94	0.66	8.95
Oct-14	1.09	18.37	1.10	0.25	3.34	2.94	49.67	2.97	0.66	9.03
Nov-14	1.13	19.12	1.14	0.26	3.48	3.05	51.58	3.08	0.69	9.38
Dec-14	1.16	19.68	1.18	0.26	3.58	3.19	53.98	3.22	0.72	9.81
Jan-15	1.23	20.88	1.25	0.28	3.80	3.29	55.68	3.33	0.74	10.12
Feb-15	1.26	21.24	1.27	0.28	3.86	3.35	56.68	3.38	0.76	10.31
Mar-15	1.21	20.44	1.22	0.27	3.72	3.32	56.17	3.35	0.75	10.21

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	
Pit Gina	Pit Gilda
	4.20 TPY
	71.07 TPY
	4.24 TPY
	0.95 TPY
	12.92 TPY

**Platforms Gina and Gilda Crew and Supply Boats  
April 2014 - March 2015  
Log of Boats Operating**

The following crew and supply boats operated at Platform Gina and Platform Gilda

**Crew Boats:**

Luke  
Capt T Le  
Patrick

**Supply Boats:**

Ryan T  
Capt T Le  
Danny C  
Adele Elise

**Boat Engines:**

Ryan T  
4 - 567 BHP Scania Model DI16M, Main Engines  
2 - 40 BHP Alaska Diesel Northern Light Model M30CW3, Generator Engines

Luke  
3 - 567 BHP Scania Model DI16M, Main Engines  
2 - 40 BHP Alaska Diesel Northern Light Model M30CW3, Generator Engines

Cap T Le  
3 - 567 BHP Scania Model DI16M, Main Engines  
2 - 40 BHP Alaska Diesel Northern Light Model M30CW3, Generator Engines

Patrick  
3 - 510 BHP Detroit/CCTS 12V71 TI, Main Engines  
2 - 32 Kw (42.9 BHP) Kohler 32EOZD, Generator Engines

Danny C  
2 - 360 BHP Diesel Main Engines, Caterpillar 3406C  
1 - 30 BHP Diesel Generator Engine, Shibaura M20CRW2  
1 - 47 BHP Diesel Generator Engine, Isuzu 4JB1  
1 - 45 BHP Winch engine, Detroit 2-71

Adele Elise  
2 - 2,000 BHP Diesel Main Engines, Caterpillar 3516  
2 - 112 BHP Diesel Generator Engines, John Deere 4045TF275D  
1 - 660 BHP Diesel Bow Thruster Engine, Cummins QSK19-M

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

	<b>Total Usage</b>	<b>12 Mo 'Running' Total</b>	<b>12 Mo 'Running' Total</b>	
	<b>Gasoline</b>	<b>Gasoline</b>	<b>Gina 50%</b>	<b>Gilda 50%</b>
	<b>gallons</b>	<b>gallons</b>	<b>gallons</b>	<b>gallons</b>
Apr-13	0.10	4.8	2.38	2.38
May-13	0.00	4.8	2.38	2.38
Jun-13	0.05	4.8	2.40	2.40
Jul-13	0.00	2.9	1.45	1.45
Aug-13	0.00	0.7	0.33	0.33
Sep-13	0.00	0.5	0.25	0.25
Oct-13	0.00	0.5	0.25	0.25
Nov-13	0.00	0.5	0.25	0.25
Dec-13	0.00	0.5	0.23	0.23
Jan-14	0.00	0.4	0.18	0.18
Feb-14	0.00	0.3	0.13	0.13
Mar-14	0.00	0.2	0.08	0.08
Apr-14	0.00	0.1	0.03	0.03
May-14	0.00	0.1	0.03	0.03
Jun-14	0.00	0.0	0.00	0.00
Jul-14	0.00	0.0	0.00	0.00
Aug-14	0.00	0.0	0.00	0.00
Sep-14	0.00	0.0	0.00	0.00
Oct-14	0.00	0.0	0.00	0.00
Nov-14	0.00	0.0	0.00	0.00
Dec-14	0.00	0.0	0.00	0.00
Jan-15	0.00	0.0	0.00	0.00
Feb-15	0.00	0.0	0.00	0.00
Mar-15	0.00	0.0	0.00	0.00

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

Supporting Documentation  
PC 1, #8

**PLATFORM GINA  
FLARE USAGE**

MONTH	Pilot	Planned	Unplanned	12 Month 'Rolling' Total	
	SCF	MCF	MCF	Pilot MMSCF	Planned MMSCF
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
Apr-14		173.0	0.0	0.00	0.282
May-14		25.0	21.0	0.00	0.204
Jun-14		162.0	18.0	0.00	0.364
Jul-14		135.0	0.0	0.00	0.497
Aug-14		2.0	0.0	0.00	0.499
Sep-14		238.0	0.0	0.00	0.737
Oct-14		552.0	0.0	0.00	1.288
Nov-14		342.0	104.0	0.00	1.630
Dec-14		10.0	906.0	0.00	1.640
Jan-15		0.0	633.0	0.00	1.639
Feb-15		1.0	76.0	0.00	1.640
Mar-15		0.0	129.0	0.00	1.640

<i>Permit Limit Planned Flaring MMSCF/YR</i>	<b>16.6</b>
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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-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
Apr-14	1.2	0.0	1.2	7.7
May-14	0.9	0.0	0.9	8.6
Jun-14	1.1	0.0	1.1	9.7
Jul-14	0.9	0.0	0.9	10.6
Aug-14	1.0	0.0	1.0	11.6
Sep-14	0.0	75.2	75.2	86.8
Oct-14	0.7	0.0	0.7	87.5
Nov-14	1.1	0.0	1.1	88.6
Dec-14	0.0	2.4	2.4	91.0
Jan-15	0.8	0.0	0.8	0.8
Feb-15	0.9	0.0	0.9	1.7
Mar-15	0.8	0.0	0.8	2.5

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



**PLATFORM GINA**  
**Visible Emissions Inspection Record - VCAPCD**

<b>Date</b>	<b>Time</b>	<b>Inspected by</b>	<b>Emission Unit</b>	<b>Observations/Corrective Action</b>
24-Apr-15	13:00-13:03	Jesse Vanhoy	Standby Generator	No Visible Emissions
24-Apr-15	13:15-13:18	Jesse Vanhoy	HTM Heater	No Visible Emissions
24-Apr-15	13:23-13:26	Jesse Vanhoy	Flare	No Visible Emissions
24-Apr-15	13:48-13:51	Jesse Vanhoy	South Crane	No Visible Emissions
24-Apr-15	14:41-14:44	Jesse Vanhoy	North Crane	No Visible Emissions



## STATIONARY IC EMISSION TEST

PREPARED FOR:



DATE:	April 24, 2014	PLATFORM:	GINA
QUARTER:	2nd	EQUIPMENT:	SEAKING CRANE
FIELD TECHNICIAN:	JESSE VANHOY	MANUFACTURER:	CATERPILLAR
FUEL TYPE:	#2 DIESEL	MODEL NUMBER :	3406

	RUN 1	RUN 2	RUN 3	AVERAGE	
RPM	1950	1950	1950	1950	
O2	11.4	12.1	12.3	11.9	
CO	58	39	37	45	
NX	1103	1083	994	1060	LIMIT
<i>CO corrected to %15 O2</i>	36	26	25	29	49
<i>NX corrected to %15 O2</i>	685	726	682	698	

COMMENTS: Readings were taken post-cat. Temperature: 512°F

Pressure Drop (inches of water column): 3"

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**PLATFORM GINA  
ENGINE MAINTENANCE  
40 CFR Part 63, Subpart ZZZZ**

Change Oil and Filter every 500 hours of operation or annually, whichever comes first  
Inspect Air Cleaner every 1,000 hours of operation or annually, whichever comes first  
Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first

**Gina Crane**

Oil / Filter Change	5/1/2013	7/5/2014
Air Cleaner Inspection	5/1/2013	7/5/2014
Belt Hose Inspection	5/1/2013	7/5/2014

**Gina Emergency Generator**

Oil / Filter Change	5/1/2013	6/3/2014
Air Cleaner Inspection	5/1/2013	6/3/2014
Belt Hose Inspection	5/1/2013	6/3/2014

Note: Inspections of air cleaner and belt hose includes replacement.

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
19-Apr-14	32	1	0.17	0.005	0.00	0.000
28-Apr-14	85	1	0.17	0.014	0.00	0.000
29-Apr-14	56	1	0.17	0.009	0.00	0.000
3-May-14	25	0	0.06	0.001	0.00	0.000
3-May-14	21	0	0.06	0.001	0.00	0.000
3-Jun-14	2	0	0.06	0.000	0.00	0.000
11-Jun-14	18	0	0.06	0.001	0.00	0.000
13-Jun-14	69	25	4.22	0.291	0.00	0.000
15-Jun-14	91	40	6.75	0.615	0.00	0.000
11-Jul-14	135	1	0.17	0.023	0.00	0.000
8-Aug-14	2	3	0.51	0.001	0.00	0.000
10-Sep-14	2	0	0.06	0.000	0.00	0.000
24-Sep-14	15	0	0.06	0.001	0.00	0.000
27-Sep-14	221	0	0.06	0.013	0.00	0.000
2-Oct-14	261	0	0.06	0.015	0.00	0.000
3-Oct-14	125	0	0.06	0.007	0.00	0.000
4-Oct-14	16	0	0.06	0.001	0.00	0.000
10-Oct-14	150	0	0.06	0.009	0.00	0.000
4-Nov-14	67	3	0.51	0.034	0.00	0.000
10-Nov-14	16	2.5	0.42	0.007	0.00	0.000
10-Nov-14	21	3	0.51	0.011	0.00	0.000
20-Nov-14	342	1.5	0.25	0.087	0.00	0.000
5-Dec-14	10	0	0.06	0.001	0.00	0.000
15-Dec-14	20	3	0.51	0.010	0.00	0.000
23-Dec-14	27	1.5	0.25	0.007	0.00	0.000
25-Dec-14	10	1	0.17	0.002	0.00	0.000
26-Dec-14	153	1	0.17	0.026	0.00	0.000
26-Dec-14	19	4	0.68	0.013	0.00	0.000
27-Dec-14	149	2	0.34	0.050	0.00	0.000
28-Dec-14	158	5	0.84	0.133	0.00	0.000
28-Dec-14	12	2	0.34	0.004	0.00	0.000
29-Dec-14	172	2	0.34	0.058	0.00	0.000
31-Dec-14	90	2	0.34	0.030	0.00	0.000
31-Dec-14	96	3	0.51	0.049	0.00	0.000
1-Jan-15	177.95	3	0.51	0.090	0.00	0.000
1-Jan-15	24.05	1	0.17	0.004	0.00	0.000
2-Jan-15	206	5.5	0.93	0.191	0.00	0.000
3-Jan-15	95	3	0.51	0.048	0.00	0.000
4-Jan-15	120	3.75	0.63	0.076	0.00	0.000
24-Jan-15	10	2	0.34	0.003	0.00	0.000
4-Feb-15	76	0.25	0.04	0.003	0.00	0.000
23-Feb-15	1	4	0.68	0.001	0.00	0.000
14-Mar-15	90	3	0.51	0.046	0.00	0.000
31-Mar-15	39	1.5	0.25	0.010	0.00	0.000
<b>TOTAL</b>	<b>3527.0</b>			<b>2.003</b>		<b>0.000</b>
<b>TOTAL SULFUR EMISSIONS</b>					<b>2.003</b>	<b>lb SO2</b>
					<b>0.00100</b>	<b>ton SO2</b>
<b>Annual Limits:</b>						
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		April-14	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME
4/19/14	09:10	11:20	32	1	Work In Gas Line at Mandalay	PLANNED	JULIO
4/28/14	1545	2300	85	1	MOSF Working on Gas Line	PLANNED	DAN
4/29/14	1315	1730	56	1	MOSF Working on Gas Line	PLANNED	DAN

**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"					May-14		
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME
5/3/14	12:00	13:40	25	0	Testing Flare System	PLANNED	RICHARD
5/3/14	15:20	16:45	21	0	Gas Line Shut In at MOSF (Gas Company)	UNPLANNED	RICHARD

**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

<b>Record all flaring greater than 10 minutes. Record ppm, not "sweet" or "x"</b>				<b>Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if &gt;300 ppm H2S</b>		<b>June-14</b>	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME
6/3/14	07:00	07:15	2	0	Testing Flare System	PLANNED	RICK BEALL
6/11/2014	12:42	14:00	18	0	Gas Line at MOSF Shut-in by Gas Company	UNPLANNED	DAN SOBER
6/13/14	05:00	09:40	69	25	Sent Casing Gas To Flare For Scheduled Work	PLANNED	RICK BEALL
6/15/14	05:30	12:45	91	40	Sent Casing Gas To Flare For Scheduled Work	PLANNED	RICK BEALL

**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 (<30



**PLATFORM GINA FLARE LOG**

Record all flaring greater than 10 minutes. Record ppm, not "sweet" or "x"				<b>July-14</b>			
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME
7/11/14	06:10	15:40	135	1	Gas to Flare to Replace Valves on Chiller	PLANNED	RICHARD B.

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

# PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not "sweet" or "x"					August-14		
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME
8/8/14	19:22	19:29	2	3	Flare System Test	PLANNED	JULIO RIVERA

**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"					September-14		
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS
9/10/14	1015	1020	2	0	Flare System Test	PLANNED	RB
09/24/14	9:10	12:00	15	0	Blowdown Gas Line for Smart Piggng	PLANNED	RB
09/27/14	15:30	19:00	221	0	Bleeding Down Casing Gas	PLANNED	CY

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

# PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not "sweet" or "x"					October-14		
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS
10/2/14	00:00	24:00	261	0	Gas Line Smart Pigging Operations	PLANNED	R.B
10/3/14	00:00	11:30	125	0	Gas Line Smart Pigging Operations	PLANNED	R.B
10/4/14	13:10	13:50	16	0	Worked In Chiller's Inlet Valve	PLANNED	R.B
10/10/14	10:00	17:25	150	0	Replaced Chiller SDV-301	PLANNED	C.Y.

**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"						November-14	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR INITIALS
11/4/14	03:22	06:30	67	3	Closed Gas Line Valve at Mandalay	UNPLANNED	JAR
11/10/14	14:25	15:10	16	2.5	Closed Gas Line Valve at Mandalay	UNPLANNED	DS
11/10/14	15:26	16:26	21	3	Closed Gas Line Valve at Mandalay	UNPLANNED	JAR
11/20/14	10:15	00:00	342	1.5	Bleeding Down H-1 Casing Gas	PLANNED	JR

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

# PLATFORM GINA FLARE LOG

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		December-14	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME	
12/5/14	14:20	17:00	10	0	PSV For H01	PLANNED	TERESA SAVI	
12/15/14	07:35	08:15	20	3	Gas Line Closed at Mandalay	UNPLANNED	RICK BEALL	
12/23/14	04:36	07:20	27	1.5	Gas Line Closed at Mandalay	UNPLANNED	JAIME	
12/25/14	23:25	00:00	10	1	Gas Line Closed at Mandalay	UNPLANNED	JULIO RIVERA	
12/26/14	00:00	08:50	153	1	Gas Line Closed at Mandalay	UNPLANNED	JULIO RIVERA	
12/26/14	22:58	00:00	19	4	Gas Line Closed at Mandalay	UNPLANNED	JULIO RIVERA	
12/27/14	00:00	08:15	149	2	Gas Line Closed at Mandalay	UNPLANNED	JULIO RIVERA	
12/28/14	00:45	09:30	158	5	Gas Line Closed at Mandalay	UNPLANNED	TERESA SAVI	
12/28/14	23:20	00:00	12	2	Gas Line Closed at Mandalay	UNPLANNED	JULIO RIVERA	
12/29/14	00:00	09:15	172	2	Gas Line Closed at Mandalay	UNPLANNED	JULIO RIVERA	
12/31/14	04:10	09:10	90	2	Mandalay Shut Down Booster Due to Low Temperature	UNPLANNED	JULIO RIVERA	
12/31/14	19:00	00:00	96	3	Mandalay Shut Down Booster Due to Low Temperature	UNPLANNED	JULIO RIVERA	

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

# PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not "sweet" or "x"					January-15		
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME
1/1/15	00:00	9:15	177.95	3	Mandalay Booster Compressor Shutdown Due to Low Temperature	UNPLANNED	Tsavi
1/1/15	22:45	00:00	24.05	1	Mandalay Booster Compressor Shutdown Due to Low Temperature	UNPLANNED	Tsavi
1/2/15	00:00	10:45	206	5.5	Mandalay Booster Compressor Shutdown Due to Low Temperature	UNPLANNED	Tsavi
1/3/15	5:35	9:15	95	3	Mandalay Booster Compressor Shutdown Due to Low Temperature	UNPLANNED	Tsavi
1/4/15	4:30	10:15	120	3.75	Mandalay Booster Compressor Shutdown Due to Low Temperature	UNPLANNED	Tsavi
1/24/15	22:15	22:48	10	2	Mandalay Problem - Gas Line Shut-In	UNPLANNED	JULIO RIVERA

**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"				February-15			
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME
2/4/15	10:00	14:30	76	.25	Installing PSV on chiller plant	UNPLANNED	JULIO RIVERA
2/23/15	18:25	18:30	1	4	Monthly Flare Ignitor Test	PLANNED	JULIO RIVERA

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



# PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not "sweet" or "x"					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		March-15	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME	
3/14/15	12:27	14:30	90	3	Gas Line Shut In at Mandalay	UNPLANNED	JAIME RIVERA	
3/31/15	21:30	22:35	39	1.5	MOSF Booster Compressor shutdown	UNPLANNED	JAIME RIVERA	

**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

April 21, 2015

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

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DCOR FROM 4/1/2014-3/31/2015

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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@sefuels.com



## Letter of Conformance

April 20, 2015

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, ADELE ELISE, AND DANNY C  
FROM 4/1/2014-3/31/2015

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

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 <sub>2</sub> O = 1): ND	Water Solubility: Complete	pH @ 77° F: 13.0 ± 0.5
			VOCgm/L: 44

Appearance and Odor: Clear yellow-green liquid, cucumber odor

SECTION IV. FIRE AND EXPLOSION HAZARD DATA

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

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

Unusual Fire and Explosion: None known

SECTION V. HEALTH HAZARD DATA

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

(Acute) Health Hazards:

Eyes: May cause irritation, redness and pain

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

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

Inhalation: May cause irritation of upper respiratory tract

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

Signs and Symptoms of Exposure:

Eyes: Redness, irritation and blurry vision

Skin: May cause irritant reaction on prolonged contact

Ingestion: Abdominal discomfort, nausea, vomiting and diarrhea

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

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

Emergency First Aid Procedures:

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

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

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

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

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 2014

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	1	0	0	0		
	% Leaking:	0.00%	0.08%	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)	
<b>No Reportable Leaks for this Quarter</b>								
<b>Inspected on 05/12/2014</b>								

**VENTURA COUNTY APCD  
 RULE 74.10  
 COMPONENT LEAK REPORT  
 Report for the 3rd Quarter of 2014**

Method of Inspection:		Components	Valves	Others	Pumps	Compres.	PRV's
TYA		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	1	0
		% Leaking:	0.00%	0.00%	0.00%	100.00%	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)
Compressor	Sub Deck, C-730	09/10/2014 3:40PM	09/10/2014 3:40PM	1,200	N/A	09/20/2014 3:40PM	Taken Out Of Service



**VENTURA COUNTY APCD  
 RULE 74.10  
 COMPONENT LEAK REPORT  
 Report for the 4th Quarter of 2014**

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	4	0	0	0
	% Leaking:	0.00%	0.33%	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)
Flange	Sub Deck, C-700 Vapor Compressor	10/24/2014 2:20PM	10/24/2014 2:20PM	10,000	N/A	10/27/2014 2:20PM	0
Cap	Sub Deck, C-730	10/24/2014 2:35PM	10/24/2014 2:35PM	4,000	N/A	10/26/2014 2:35PM	0
PVRV	Sub Deck, T - 801	10/24/2014 3:00PM	10/24/2014 3:00PM	4,900	N/A	10/26/2014 3:00PM	0
Electrical Connection	Sub Deck, C-730	10/27/2014 4:28PM	10/27/2014 4:28PM	1,500	N/A	11/04/2014 4:28PM	0

**VENTURA COUNTY APCD**  
**RULE 74.10**  
**COMPONENT LEAK REPORT**  
 Report for the 1st Quarter of 2015

FACILITY: DCOR, PLATFORM GINA			PERMIT#: 1491			
Method of Inspection: <b>TVA</b>	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)
<b>No Reportable Leaks for this Quarter</b>							
<b>Inspected on 03/04/2015</b>							