



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

February 15, 2016

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

Ventura County
FEB 16 2016
Air Pollution Control District

RE: Annual Compliance Certification Report
Platform Gilda, PTO 1492

Dear Mr. Searcy:

DCOR, LLC, is submitting the enclosed Annual Compliance Verification report for Platform Gilda as required by Part 70 Permit to Operate 1492. This report covers the time period of January 1, 2015, through December 31, 2015.

Please do not hesitate to contact me at 805-535-2066 with any questions.

Sincerely,

A handwritten signature in black ink that reads "K. Scott Knight". The signature is written in a cursive, slightly slanted style.

Scott Knight
Manager – Environmental, Safety & Regulatory Compliance

Enclosure



DCOR, LLC

**2015 ANNUAL COMPLIANCE
CERTIFICATION REPORT**

PLATFORM GILDA

**PART 70
PERMIT TO OPERATE 1492**

Submitted to:

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

Submitted by:

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

DCOR, LLC – PLATFORM GILDA – PTO 1492

**2015
COMPLIANCE VERIFICATION REPORT**

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SECTION 1
Compliance Certification



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SIGNATURE COVER FORM

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


Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Confidentiality

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:  Title: Bob Garcia, VP California Offshore Operations	Date: 2.16.16
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Time Period Covered by Compliance Certification 01 / 01 / 2015 (MM/DD/YY) to 12 / 31 / 2015 (MM/DD/YY)

1.c. PERIODIC MONITORING SUMMARY

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

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

1.c.1. Specific Applicable Requirements

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.1N1 —	Rules 71.1 B.1.a, 74.10	<ul style="list-style-type: none"> •Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable •Verbal notice of maintenance activities •Rule 74.10 inspections •Annual compliance certification including verification that tanks are equipped with a vapor recovery system. 	<ul style="list-style-type: none"> •Records of quarterly inspections and tank maintenance activities •Rule 74.10 records 	None	None	
71.1N6 —	Rules 71.1 B.3, 71.1 D.1.c, 74.10	<ul style="list-style-type: none"> •Annual compliance certification including verification of the integrity of the roof and pressure-vacuum relief valve •Rule 74.10 inspections 	<ul style="list-style-type: none"> •Records of number of days the tank has stored or held crude oil during the maintenance operation, location of the tank relative to a tank battery, and whether tank was connected to vapor recovery •Records to show integrity of roof and PV valves for tanks not permanently located at facility •Rule 74.10 records 	None	None	

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.4 N1	Rules 71.4.B.2 and 74.10	<ul style="list-style-type: none"> Verbal notice of maintenance operations Rule 74.10 inspections Annual compliance certification including verifying the integrity of the cover Annual compliance certification Hours of operation 	<ul style="list-style-type: none"> Records of maintenance Rule 74.10 records 	None	None	
74.9N7	Rule 74.9.D.3	<ul style="list-style-type: none"> Annual compliance certification Hours of operation 	<ul style="list-style-type: none"> Records of operating hours Date, time, duration, and reason for emergency operation Records of engine data 	None	None	
74.9N9	Rule 74.9.D.9	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance to ensure diesel-fired engine is used to power cranes and welding equipment only 	<ul style="list-style-type: none"> Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location 	None	None	
74.15.1N1	Rule 74.15.1.B.1	<ul style="list-style-type: none"> Annual compliance certification Biennial Source Test (NO_x, CO) Annual NO_x and CO screening Routine surveillance to ensure emission unit is functioning w/in its normal operating parameters 	<ul style="list-style-type: none"> Records of source tests Records of NO_x and CO screenings Daily records of alternate fuel consumption 	None	<ul style="list-style-type: none"> NO_x-ARB Method 100 CO-ARB Method 100 	
ATCM Engine N3	ATCM for Stationary Compression Ignition Engines – OCS	<ul style="list-style-type: none"> Fuel type records Fuel use records 	<ul style="list-style-type: none"> Fuel type records Fuel use records 	None	None	Not federally enforceable
40CFR63ZZZN3	RICE MACT for emergency diesel engines – oil change and inspections	<ul style="list-style-type: none"> Maintenance records Use non-resettable hour meter Annual compliance certification 	<ul style="list-style-type: none"> Maintenance records Hours of operation records 	None	None	
40CFR63ZZZN5	RICE MACT for non-emergency diesel engines > 300 HP & ≤ 500 HP, CO ppm limit	<ul style="list-style-type: none"> Initial CO source testing Maintain catalyst pressure / temperature Annual compliance certification 	<ul style="list-style-type: none"> Initial CO testing records 	As specified in Sections 63.6650(c)(1)-(6)	Portable analyzer, or EPA Methods 3, 4, and 10 or their designated alternatives	

1.c.2. Permit-Specific Conditions

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1492PC1 - Condition No. 1	Rule 29 General Recordkeeping	<ul style="list-style-type: none"> Annual compliance certification Monthly records of throughput and consumption Annual compliance certification 	<ul style="list-style-type: none"> Monthly records 	None	None	
PO1492PC1 - Condition No. 2	Rule 29 Maximum Number of Oil Wells	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO 1492PC1 - Condition No. 3	Rule 26 Well Operations - BACT Requirements	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO1492PC1 - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	<ul style="list-style-type: none"> Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery Annual compliance certification 	Fuel records	None	None	
PO1492PC1 - Condition No. 5	Rules 26 and 29 Crew Boat and Work Boat Emission Limits	<ul style="list-style-type: none"> Diesel fuel consumption for boats servicing Platforms Gina and Gilda Monthly calculations of emissions (boats) Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of diesel fuel consumption Monthly calculations of emissions (boats) 	None	None	
PO1492PC1 - Condition No. 6	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> Annual compliance certification Maintain a log book of hours and days of crew boat operation Maintain a log of boats and engines Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of crew boat operation Maintain a log of crew boats and engines 	None	None	
PO1492PC1 - Condition No. 7	Rule 29 Two Work Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation Maintain a log of boats and engines Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation Maintain a log of work boats and engines 	None	None	
PO1492PC1 - Condition No. 8	Rule 26 Boom Boat Fuel Limit	<ul style="list-style-type: none"> Gasoline consumption at Boom Boats Monthly gasoline consumption records Annual compliance certification 	<ul style="list-style-type: none"> Monthly gasoline consumption 	None	None	
PO1492PC1 - Condition No. 9	Rules 23 and 29 Solvent Recordkeeping	<ul style="list-style-type: none"> Maintain a list of exempt solvents Annual compliance certification 	<ul style="list-style-type: none"> Maintain a list of exempt solvents 	None	None	
PO1492PC2 - Condition Nos. 1, 2, and 5	Rule 29 Flare Fuel Consumption	<ul style="list-style-type: none"> Fuel consumption Identify emergency vs. non-emergency usage Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of fuel consumption 	None	None	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1492PC2 - Condition Nos. 3 and 4	Rules 71.1 Flare Ignition System Operation	<ul style="list-style-type: none"> Monthly tests of flare's ignition system Annual compliance certification 	<ul style="list-style-type: none"> Records of ignition system Maintenance records 	None	None	
PO1492PC3 - Condition No. 1	40 CFR Part 63. Subpart ZZZZ RICE MACT 100 hr/yr maintenance and testing limit	<ul style="list-style-type: none"> Annual compliance certification Monthly records of maintenance and testing hours 	<ul style="list-style-type: none"> Monthly records of maintenance and testing hours 	None	None	
PO1492PC3 - Condition No. 2	Rules 26 and 74.9 200 hours per year backup utility generator operation	<ul style="list-style-type: none"> Annual compliance certification Monthly records of backup utility generator hours of operation 	<ul style="list-style-type: none"> Hours of operation log (non-resettable meter) differentiating non-emergency use and emergency use Monthly and twelve month rolling records of hours of operation Monthly fuel consumption 	None	None	
PO1492PC3 - Condition No. 3	Rule 74.9 200 hours per year / emergency use exemptions	<ul style="list-style-type: none"> Annual compliance certification Recordkeeping 	<ul style="list-style-type: none"> Hours of operation log (non-resettable meter) Monthly and twelve month rolling records of hours of operation 	None	None	

1.c.3. General Applicable Requirements

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	<ul style="list-style-type: none"> • Routine surveillance • Visual inspections • Annual compliance certification, including a formal survey • Opacity readings upon request • Notification required for uncorrectable visible emissions 	<ul style="list-style-type: none"> • All occurrences of visible emissions for periods > 3min in any one hour • Annual formal survey of all emissions units 	None	<ul style="list-style-type: none"> • Opacity - EPA Method 9 	
54.B.1 (OCS)	Rule 54.B.1	<ul style="list-style-type: none"> • Annual compliance certification • Identify planned vs. unplanned flaring event • Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event • Upon request, source test for sulfur compounds at point of discharge 	<ul style="list-style-type: none"> • Representative fuel analysis or exhaust analysis and compliance demonstration • Flare records 	None	<ul style="list-style-type: none"> • Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-941, as appropriate 	
54.B.2 (OCS)	Rule 54.B.2	<ul style="list-style-type: none"> • Annual compliance certification • Identify planned vs. unplanned flaring event • Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event • Determine ground or sea level concentrations of SO₂, upon request • Annual compliance certification 	<ul style="list-style-type: none"> • Representative fuel analysis or exhaust analysis and modeling data or other compliance demonstration • Flare records 	None	<ul style="list-style-type: none"> • SO₂ - BAAQMD Manual of Procedures, Vol VI, Section 1, Ground Level Monitoring for H₂S and SO₂ (July 20, 1994) 	
57.1	Rule 57.1	<ul style="list-style-type: none"> • Annual compliance certification 	None	None	None	<ul style="list-style-type: none"> • Not required based on District analysis
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> • Annual compliance certification • None for PUC-quality gas • Annual test for non PUC-quality gas (submit with annual compliance certification) 	<ul style="list-style-type: none"> • Annual fuel gas analysis for non PUC-quality gas 	None	<ul style="list-style-type: none"> • SCAQMD Method 307-94 	
64.B.2	Rule 64.B.2	<ul style="list-style-type: none"> • Annual compliance certification • Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification) 	<ul style="list-style-type: none"> • Fuel supplier's certification, or fuel test per each delivery 	None	<ul style="list-style-type: none"> • ASTM Method D4294-83 or D2622-87 	

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

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

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

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

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

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

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

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SECTION 2

Breakdowns, Deviations, and Excess Emissions

PTO 1492: Platform Gilda

Reporting Period: January 1, 2015 through December 31, 2015

There was one (1) breakdown filed during this reporting period.

There were two (2) deviations filed.

There was one Notice of Violation issued.

These are summarized on the following Annual Compliance Certification Deviation Summary

Excess Emissions

Date	NOx (lbs)	ROC (lbs)	CO (lbs)	SOx (lbs)	PM (lbs)	PM10 (lbs)
1/27-2/24/15	0	0	0	0	0	0
7/14/2015	0	0.0001	0	0	0	0
10/25-10/26/15	0	0	0	0	0	0
Total	0	0.0001	0	0	0	0



**ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM**

Period Covered by Compliance Certification: 01/01/15 to 12/31/15
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 74.15 1N1</p>	<p>B. Equipment description: 4.0 MMBTU/hr Process Heater</p>	<p>C. Deviation Period: Date & Time Begin <u>1/27/2015</u> End <u>2/24/2015</u> When Discovered: Date & Time <u>1/27/15, 1:00 pm</u></p>
<p>D. Parameters monitored: NOx concentration (ppm @ 3% O2) NOx lb/hr was also calculated</p>	<p>E. Limit 30 ppm @ 3% O2 / 0.14 lb/hr NOx</p>	<p>F. Actual: 41 ppm @ 3% O2 / 0.07 lb/hr (There was no exceedance of the lb/hr limit, thus no excess emissions).</p>
<p>G. Probable Cause of Deviation A mechanical linkage arm connecting the fuel and air valves present to keep the air to fuel ratio balanced was found to be loose due to wear and exposure to weather elements.</p>		<p>H. Corrective actions taken: A new mechanical linkage arm was ordered and installed. A follow-up emission source test was successfully conducted on 2/24/15.</p>
<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>B. Equipment description: Vapor Recovery Compressor</p>	<p>C. Deviation Period: Date & Time Begin <u>7/14/2015 10:30 AM</u> End <u>7/14/2015 10:39 AM</u> When Discovered: Date & Time <u>7/14/2015 10:30 AM</u></p>
<p>D. Parameters monitored: Operations of vapor recovery compressor.</p>	<p>E. Limit Produced gas is either directed to sales, vapor compressor or flare.</p>	<p>F. Actual: Excess Emissions 0.0001 lbs ROC (or less than)</p>
<p>G. Probable Cause of Deviation During daily rounds it was discovered that there was a pinhole size hole in the VRU discharge line.</p>		<p>H. Corrective actions taken: Breakdown was reported to the District. The VRU was shut down and the discharge line was repaired. Vapor recovery compressor was started back up as soon as possible.</p>
<p>A. Attachment # or Permit Condition #: Rule 54.B.1</p>	<p>B. Equipment description: Flare</p>	<p>C. Deviation Period: Date & Time Begin <u>10/25/2015 5:00 PM</u> End <u>10/26/2015 7:20 AM</u> When Discovered: Date & Time <u>1/15/2016 12:00 PM</u></p>
<p>D. Parameters monitored: H2S concentration in flared gas</p>	<p>E. Limit Notification is required for unplanned flaring lasting longer than one hour in duration with H2S greater than 300 ppm.</p>	<p>F. Actual: Platform Gilda had unplanned flaring with H2S of 800-865 for 14.3 hours. A total of 148 MCF was flared at this H2S concentration.</p>
<p>G. Probable Cause of Deviation Vapor compressor issues and produced gas could not be routed to the amine plant to remove H2S.</p>		<p>H. Corrective actions taken: Sweet gas was added to the sour gas stream to dilute the H2S concentration until compressor repairs were conducted.</p>

*Maintenance
Noted emission
100852*

*Flaring
Noted emission
101253*

SECTION 3

Specific Applicable Requirements



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/15 to 12/31/15
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 71.1N1 ✓</p>	<p>D. Frequency of monitoring: Daily, Quarterly</p>
<p>B. Description Fugitive Emission Inspection and Maintenance Program (Rule 74.10) Rule 71.1.B.1a. Compliance via vapor recovery</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Daily visual inspections verifying that the vapor recovery is operational on the tanks. Quarterly inspections per Rule 74.10 and EPA Method 21 ensuring that the hatches do not leak.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Attachment 71.1N6 ✓</p>	<p>D. Frequency of monitoring: Daily, Quarterly</p>
<p>B. Description Crude Oil Production and Separation, Compliance with Vapor Recovery</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Daily visual inspections verifying that the integrity of the roofs and pressure relief valves on the portable tanks. Quarterly inspections per Rule 74.10 EPA Method 21 ensuring that the hatches do not leak. The VRU is a closed system.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Attachment 71.4N1 ✓</p>	<p>D. Frequency of monitoring: Quarterly</p>
<p>B. Description Petroleum Sumps, Pits, Ponds and Well Cellar Compliance</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Quarterly inspections verifying the integrity of covers and/or roofs on sumps. Quarterly inspections per Rule 74.10 EPA Method 21 ensuring that the hatches do not leak.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/15 to 12/31/15
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 74.9N7</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Stationary Internal Combustion Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Emergency standby stationary internal combustion engine only operated during an emergency or during maintenance operation of not more than 50 hours per calendar year.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Attachment 74.9N9</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Stationary Internal Combustion Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: All crane and welder IC engines are diesel fired. These engines are used to power the cranes and welders only.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Attachment 74.15.1N1</p>	<p>D. Frequency of monitoring: Daily records of fuel use; Biennial source test; Annual screening analysis.</p>
<p>B. Description Boilers, Steam Generators, and Process Heaters</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. ARB Method 100 (NOx and CO)</p>
<p>C. Method of monitoring: Biennial emission source testing to ensure that the uniflux heater is operating within the normal parameters.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>I</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>Y</u> *Deviation Summary Form in Report Section #2</p>

- New No. 23405



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01/01/15 to 12/31/15
(MM/DD/YY) (MM/DD/YY)

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant NOx
C. Measured Emission Rate 26.8 ppm @ 3% O2	D. Limited Emission Rate 30 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation ARB Method 100	F. Test Date 2/24/2015

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant CO
C. Measured Emission Rate 66 ppm @ 3% O2	D. Limited Emission Rate 400 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation ARB Method 100	F. Test Date 2/24/2015



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<p>A. Attachment # or Permit Condition #: ATCM Engine N3 ✓</p>	<p>D. Frequency of monitoring: Daily, Annually</p>
<p>B. Description Air Toxic Control Measure for Stationary Compression Ignition 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>
<p>A. Attachment # or Permit Condition #: 40 CFR 63 ZZZZ N3 (RICE MACT)</p>	<p>D. Frequency of monitoring: Daily, Annually</p>
<p>B. Description NESHAP for Stationary RICE, Emergency 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: Change oil filter every 500 hours or annually. Inspect air cleaner every 1,000 hours or annually. Inspect all hoses and belts every 500 hours or annually. Emergency Use operations as specified. 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>
<p>A. Attachment # or Permit Condition #: 40 CFR 63 ZZZZ N5 (RICE MACT) ✓</p>	<p>D. Frequency of monitoring: Daily, Annually</p>
<p>B. Description NESHAP for Stationary RICE, Non-Emergency 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: Minimize engine idle time. Comply with applicable emission standards. Use of nonroad diesel. Crankcase ventilation system. 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>

SECTION 4

Permit Specific Conditions



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<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 1 ✓</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Monthly Records of Throughput and Fuel Consumption: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Records maintained for platform throughput, equipment hours of operations, and fuel consumption.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 2 ✓</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Maximum Number of Oil Wells: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: The platform is permitted with the maximum number of wells, this number cannot be exceeded. This platform has 48 slots with oil well completions. Annual Compliance Certification.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 3 ✓</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Well Operations: BACT Requirements: Rule 26</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Annual Compliance Certification verifying that the wells S-89 (slot 6), S-87 (slot 28) and S-28 (slot 58) are free flowing, have operated on gas lift, or with electric motor driven artificial lift equipment.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 4</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Maximum Sulfur Content of Diesel Fuel: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Records of sulfur content of diesel fuel maintained from fuel supplier.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 5</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Crew and Work Boat Emission Limits: Rules 26 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: Daily records of diesel fuel consumption and emission calculations using Ventura County APCD approved emission factors. Fuel consumption is determined through either inline non-resettable meter or onboard daily soundings.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 1 Item 6</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Two Crew Boats Shall not be used Simultaneously: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Log book maintained confirming crew boat activity including hours, days, and location of activity. Annual certification of compliance.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 1 Item 7 ✓</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Two Work Boats Shall not be used Simultaneously: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Log book maintained confirming work boat activity including hours, days, and location of activity. Annual certification of compliance.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 8 ✓</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Boom Boat Fuel Limit: 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: Monthly records maintained of fuel consumption at boom boats. Annual compliance certification.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 9 ✓</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Solvent Recordkeeping: 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 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>



Ventura County
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<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 2 Section 1, 2, and 5 ✓</p>	<p>D. Frequency of monitoring: Daily, 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></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 #: PTO 1492 Condition 2 Sections 3 and 4 ✓</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Flare Ignition System: Rule 71.1</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Flare has continuous pilot fed by sweet gas.</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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<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 3 Section 1 ✓</p>	<p>D. Frequency of monitoring: Monthly, Annually</p>
<p>B. Description 40 CFR Part 63, Subpart ZZZZ, NESHAPS RICE MACT for Backup Utility Generator</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Monitoring of all reasons for use (i.e., loss of grid electricity or loss of stationary source's own power production).</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 3 Sections 2 and 3 ✓</p>	<p>D. Frequency of monitoring: Monthly and 12-Month Rolling Average</p>
<p>B. Description New Source Review: Rule 26; and, Stationary Internal Combustion Engines: Rule 74.9</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Non-resettable hour meters are installed on the back-up utility generator. Logs are maintained of the daily usage. The engine is operated less than 200 hours per calendar year, operated during an emergency operation, and/or operated less than 50 hours during maintenance and is 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>

SECTION 5

General Applicable Requirements



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<p>A. Attachment # or Permit Condition #: Rule 50 ✓</p>	<p>D. Frequency of monitoring: Annual Visible Emission Evaluation</p>
<p>B. Description Visible Emissions - Opacity</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Perform routine surveillance and visual inspections to ensure that compliance with Rule 50 is being maintained.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Rule 54.B.1 ✓</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Sulfur Compounds - SOx at Point of Discharge</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. If required: EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B or SCAQMD 307-94.</p>
<p>C. Method of monitoring: Maintain logs recording each flare event. 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>Y</u> *Deviation Summary Form in Report Section #2</p>
<p>A. Attachment # or Permit Condition #: Rule 54.B.2 ✓</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description Sulfur Compounds - SOx at or Beyond Property Line</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. If required: BAAQMD Ground Level Monitoring for H2S and SO2</p>
<p>C. Method of monitoring: Maintain logs recording each flare event. Record all flare events that exceed one hour or are sour. Source testing upon request.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Rule 57.1 ✓</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Combustion Contaminants, Fuel Burning Equipment</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Calculations based on Ventura County APCD approved methods</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Rule 64.B1 ✓</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Sulfur Content of Fuels (Gaseous)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Laboratory analysis conducted annually of Non-PUC quality fuel gas; Determination of Sulfur in a gaseous matrix.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Rule 64.B2 ✓</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Sulfur Content of Fuels (Liquid)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Records are maintained from diesel fuel supplier certifying the sulfur content of fuel used for the project.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>D. Frequency of monitoring: Daily, Quarterly, Annually</p>
<p>B. Description Crude Oil Production and Separation</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Produced gas must be controlled at all times and is verified through the daily visual and periodic maintenance of the produced gas collection system on Platform Gilda. Produced gas is either directed to sales, vapor compressor or flare. Compliance with Rule 74.10 ensures that various components are not leaking. The produced gas stream is a fully controlled closed loop system.</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 #: Rule 71.4.B1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Petroleum Sumps, Pits, and Well Cellars - First Stage Sump Prohibition</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: There are no first stage sumps on Platform Gilda. 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 #: Rule 71.4.B3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Petroleum Sumps, Pits, and Well Cellars - Well Cellar Storage Prohibition</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: There are no well cellars on Platform Gilda. 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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<p>A. Attachment # or Permit Condition #: Rule 74.6 ✓</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description Surface Cleaning and Degreasing</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Monthly records maintained of quantity of solvent use and purchases for solvents with ROC content of 25 grams per liter or greater. Chemco 33-S has ROC content of 44 grams/liter and is only used when diluted 1:1 with water. No other solvents with ROC content of 25 grams per liter or greater were used.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Rule 74.10 ✓</p>	<p>D. Frequency of monitoring: Daily, Quarterly, Annually</p>
<p>B. Description Fugitive Emissions - Oilfields</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Maintain a fugitive emission inspection and maintenance program that is consistent with the requirements of Rule 74.10.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u> G. Compliance Status? (C or I) <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Rule 74.11.1 ✓</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Large Water Heaters and Small Boilers</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Platform Gilda has no water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than 75,000 BTU/hr and less than or equal to 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
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<p>A. Attachment # or Permit Condition #: Rule 74.22 ✓</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Natural Gas Fired Fan - Central Furnaces</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: There are no natural gas fired fan-type furnaces on the platform. Platform Gilda is not subject to this requirement.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>

SECTION 6

General Requirements for Short-Term Activities

General Permit Conditions

Miscellaneous Federal Program Conditions



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<p>A. Attachment # or Permit Condition #: Rule 74.1 ✓</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Abrasive Blasting</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Visible emission inspection during abrasive blasting operations. Use of California Certified abrasive sands.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Rule 74.2 ✓</p>	<p>D. Frequency of monitoring: Monthly Records, Annual Compliance Certification</p>
<p>B. Description Architectural Coatings</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Maintain records of all architectural coatings used. Calculate ROC content in grams per liter in accordance to Table of Standards in Rule 74.2. Maintain records of products used, MSDS and or product data sheets.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: Rule 74.16 ✓</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Oilfield Drilling Operations</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: All drilling operations powered by grid power, or have exemption from grid power.</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/15 to 12/31/15
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Part 70 General</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description General Part 70 Permit Conditions</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1492</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: PO General</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description General Permit to Operate Conditions</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1492</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/15 to 12/31/15
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 55</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Outer Continental Shelf Air Regulations</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1492</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: 40 CFR Part 68</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Accidental Release Prevention and Risk Management Plans</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1492</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: 40 CFR Part 82</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description Protection of Stratospheric Ozone</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1492</p>	<p>F. Currently in compliance? (Y or N) <u>Y</u></p> <p>G. Compliance Status? (C or I) <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N) <u>N</u> *If yes, attach Deviation Summary Form</p>



Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: 01/01/15 to 12/31/15
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 60, Subpart OOOO</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description NSPS for Crude Oil and Natural Gas Production, Transmission and Distribution</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1492 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
Supporting Documentation

AEROS ENVIRONMENTAL, INC.

Summary Of Results

DCOR, LLC
 Platform Gilda
 4.0 MMBtu/hr Process Heater (Retest)

Project 092-8994
 February 24, 2015
 Permit No. 01492

Pollutant	ppm	ppm @ 3% O ₂	lb/hr	lb/MMBtu	Permit Limits
NOx	29.9	26.2	0.05	0.0316	0.14 lb/hr and 30 ppm @ 3% O ₂
	30.5	26.7	0.05	0.0322	
	31.5	27.6	0.05	0.0333	
Mean	30.6	26.8	0.05	0.0324	
CO	74	65	0.07	0.0477	0.32 lb/hr and 400 ppm @ 3% O ₂
	81	71	0.08	0.0520	
	70	61	0.07	0.0450	
Mean	75	66	0.07	0.0482	
Comments: _____					

PLATFORM GILDA
EMERGENCY STANDBY GENERATOR
325 bhp Diesel Engine, Caterpillar 3406

	HOURS	
	Non-Emergency	Emergency
Jan-15	0.5	0
Feb-15	0.9	0
Mar-15	1.1	0
Apr-15	0.9	0
May-15	1.2	0
Jun-15	1.4	0
Jul-15	1.0	0
Aug-15	1.9	0
Sep-15	3.1	0
Oct-15	0.7	0
Nov-15	0.8	0
Dec-15	0	11.1

HOURS	
Monthly Total	Annual Total
0.5	0.5
0.9	1.4
1.1	2.5
0.9	3.4
1.2	4.6
1.4	6.0
1.0	7.0
1.9	8.9
3.1	12.0
0.7	12.7
0.8	13.5
11.1	24.6

PLATFORM GILDA DIESEL CRANES FUEL USAGE

Supporting Documentation
PC 1

GILDA	NORTH CRANE 325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-14	37	337	4176
Feb-14	125	782	4602
Mar-14	63	415	4795
Apr-14	45	294	4908
May-14	57	395	5164
Jun-14	115	848	5850
Jul-14	169	1246	6886
Aug-14	144	976	7628
Sep-14	90	658	7967
Oct-14	70	468	7574
Nov-14	6	377	7239
Dec-14	10	671	7466
Jan-15	152	938	8068
Feb-15	90	444	7730
Mar-15	23	247	7562
Apr-15	22	242	7510
May-15	37	215	7330
Jun-15	16	102	6584
Jul-15	22	137	5475
Aug-15	19	119	4617
Sep-15	22	84	4043
Oct-15	4	90	3664
Nov-15	8	61	3349
Dec-15	7	45	2723
North Crane permit limits	19,250 gal/yr		

GILDA	SOUTH CRANE 325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-14	101	578	3944
Feb-14	61	382	3747
Mar-14	51	346	3896
Apr-14	110	697	4444
May-14	137	891	5151
Jun-14	103	643	5650
Jul-14	89	579	5955
Aug-14	44	297	5993
Sep-14	39	262	5994
Oct-14	67	462	6178
Nov-14	8	381	5993
Dec-14	80	577	6095
Jan-15	49	277	5794
Feb-15	118	710	6123
Mar-15	90	454	6231
Apr-15	28	167	5701
May-15	36	215	5025
Jun-15	21	126	4508
Jul-15	8	46	3974
Aug-15	25	141	3818
Sep-15	20	143	3699
Oct-15	21	105	3342
Nov-15	15	86	3046
Dec-15	17	99	2568
South Crane permit limits	17,200 gal/yr		

PLATFORM GILDA
UNIFLUX HEATER
4.00 MMBtu/hr, Natural Gas Uniflux Lo-NOx

	Usage		12 Mo 'Rolling' Total
	Natural gas		Natural gas
	MCF	MMSCF	MMSCF
Jan-14	952	0.95	10.29
Feb-14	850	0.85	9.91
Mar-14	946	0.95	9.71
Apr-14	902	0.90	10.11
May-14	914	0.91	11.03
Jun-14	876	0.88	11.90
Jul-14	1061	1.06	12.58
Aug-14	1048	1.05	12.52
Sep-14	966	0.97	12.48
Oct-14	1082	1.08	12.54
Nov-14	1021	1.02	12.54
Dec-14	1016	1.02	12.60
Jan-15	988	0.99	12.62
Feb-15	914	0.91	12.58
Mar-15	987	0.99	12.72
Apr-15	982	0.98	12.76
May-15	1071	1.07	12.93
Jun-15	1028	1.03	13.04
Jul-15	1213	1.21	13.38
Aug-15	1094	1.09	13.41
Sep-15	901	0.90	13.26
Oct-15	901	0.90	13.20
Nov-15	1052	1.05	13.17
Dec-15	1196	1.20	13.34

	<i>Permit limit, mmscf/yr</i>	36.6

DCOR, LLC
 Platform Gilda HTM Gas (Meter 3710)
 2015

Days	January MCF	February MCF	March MCF	April MCF	May MCF	June MCF	July MCF	August MCF	September MCF	October MCF	November MCF	December MCF
1	32	33	27	32	36	36	32	41	34	29	29	42
2	32	33	27	33	36	36	40	41	34	29	31	42
3	32	33	27	33	36	36	39	38	34	29	32	44
4	32	33	33	33	34	34	40	38	34	29	33	42
5	32	35	33	33	34	38	40	38	34	29	36	39
6	32	36	33	33	34	38	40	36	34	29	36	39
7	32	37	33	33	33	38	40	39	34	29	32	39
8	32	36	33	33	33	38	40	42	34	27	34	10
9	32	36	33	32	33	38	40	41	34	37	36	35
10	32	36	33	32	33	38	40	33	33	28	36	38
11	32	37	33	32	34	38	40	33	33	34	37	42
12	33	37	33	32	34	38	40	32	39	34	37	42
13	33	35	31	32	33	38	40	34	16	29	37	45
14	33	34	32	32	32	38	40	37	15	31	37	44
15	32	34	31	32	32	36	40	37	30	31	37	44
16	32	0	32	32	32	36	40	34	21	30	37	43
17	31	33	32	32	34	31	40	33	28	30	37	40
18	32	33	32	35	34	31	40	33	29	29	37	40
19	32	33	32	32	34	31	39	33	29	29	27	40
20	31	34	32	33	34	31	38	33	29	29	33	37
21	31	34	32	33	36	31	38	33	29	28	34	39
22	31	34	33	33	36	31	38	33	29	30	34	39
23	31	34	33	33	36	31	38	33	29	28	32	40
24	31	34	33	33	36	31	38	33	31	22	31	38
25	31	30	32	33	36	31	38	33	28	22	38	37
26	31	32	32	33	36	31	38	33	27	27	38	37
27	31	31	32	33	36	31	40	34	29	30	36	36
28	31	27	32	33	36	31	38	34	28	28	36	38
29	33	0	32	33	36	31	39	34	28	28	39	35
30	33	0	32	34	36	31	39	34	35	29	43	35
31	33	0	32	0	36	0	41	34	0	28	0	35
TOTALS	988	914	987	982	1,071	1,028	1,213	1,094	901	901	1,052	1,196

TOTAL FOR YEAR 12,327 MCF



Letter of Conformance

January 8, 2016

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

DCOR LLC from 1/1/2015-12/31/15

Was in compliance with South Coast Air Quality Management District requirements for Ventura and Santa Barbara Counties. The test Results meet ASTM D-5453 and are Typical of all CARB Ultra Low Sulfur Dyed Diesel Fuel sold by Maxum Petroleum. The sulfur Content is guaranteed to be less than .0015%. (15PPM) The high heat content is typically in the 19,950 - 20,200 BTU per pound range.

Hope Bowles

General Manager
SC Fuels
Oxnard Division
Office (805) 299-1219
bowlesh@scfuels.com



Letter of Conformance

February 2, 2016

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to
DCOR LLC FOR M/V RYAN T, CAPT T LE, PATRICK, & ALAN T FROM 1/1/2015-12/31/2015

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



**Condition
Monitoring
Services
Inc.**

STATIONARY IC EMISSION TEST

PREPARED FOR:



DOS CUADRAS OFFSHORE RESOURCES

DATE:	November 24, 2015	PLATFORM:	GILDA
QUARTER:	4th	EQUIPMENT:	NORTH 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	10.86	11.42	10.18	10.8	
CO	55	45	34	45	
NX	1042	963.1	1050.4	1019	LIMIT
<i>CO corrected to %15 O2</i>	32	28	19	26	49
<i>NX corrected to %15 O2</i>	612	599	578	597	

COMMENTS:

Readings were taken post-cat. Temperature: 595°F

Pressure Drop (inches of water column): 3.5"



STATIONARY IC EMISSION TEST

PREPARED FOR:



DATE:	November 24, 2015	PLATFORM:	GILDA
QUARTER:	4th	EQUIPMENT:	SOUTH CRANE
FIELD TECHNICIAN:	JESSE VANHOY	MANUFACTURER:	CATERPILLAR
FUEL TYPE:	#2 DIESEL	MODEL NUMBER :	3406

	RUN 1	RUN 2	RUN 3	AVERAGE	
RPM	1920	1920	1920	1920	
O2	11.57	14.85	11.60	12.7	
CO	21	16	20	19	
NX	658	469.6	801.4	643	LIMIT
<i>CO corrected to %15 O2</i>	13	16	13	14	49
<i>NX corrected to %15 O2</i>	416	458	508	461	

COMMENTS: Readings were taken post-cat. Temperature: 580°F

Pressure Drop (inches of water column): 2.5" - 3"

PLATFORM GILDA
ENGINE MAINTENANCE
40 CFR Part 63, Subpart ZZZZ

Gilda North Crane

Oil / Filter Change	3/23/2014	11/14/2014	7/6/2015
Air Cleaner Inspection	3/23/2014	11/14/2014	7/6/2015
Belt / Hose Inspection	3/23/2014	11/14/2014	7/6/2015

Gilda South Crane

Oil / Filter Change	7/2/2014	11/14/2014	3/19/2015	10/22/2015
Air Cleaner Inspection	7/2/2014	11/14/2014	3/19/2015	10/22/2015
Belt Hose Inspection	7/2/2014	11/14/2014	3/19/2015	10/22/2015

Gilda Emergency Generator

Oil / Filter Change	9/7/2014	8/10/2015
Air Cleaner Inspection	9/7/2014	8/10/2015
Belt Hose Inspection	9/7/2014	8/10/2015

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

Platforms Gina and Gilda Fuel Usage (in Gallons)

Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 75%
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
Apr-15	11,906	2,977	8,930
May-15	11,925	2,981	8,944
Jun-15	10,175	2,544	7,631
Jul-15	11,051	2,763	8,288
Aug-15	11,725	2,931	8,794
Sep-15	11,603	2,901	8,702
Oct-15	12,373	3,093	9,280
Nov-15	10,774	2,694	8,081
Dec-15	10,825	2,706	8,119
2015 Total	35,858	107,574	

Supply Boat Fuel Usage

	Gina		Gilda	
	Mains	Aux	Mains	Aux
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
Apr-15	0	0	0	0
May-15	0	0	0	0
Jun-15	138	6	414	17
Jul-15	0	0	0	0
Aug-15	0	0	0	0
Sep-15	0	0	0	0
Oct-15	0	0	0	0
Nov-15	0	0	0	0
Dec-15	0	0	0	0
2015 Total	6,331	264	18,992	791

	Rolling 12 Mo Total	
	Gina	Gilda
	56,247	158,178
	59,637	162,668
	57,477	167,138
	58,244	166,985
	58,895	167,299
	60,175	167,589
	61,234	171,975
	59,971	169,548
	64,618	175,566
	65,475	177,084
	68,147	183,886
	70,163	192,435
	74,432	198,510
	75,727	202,067
	72,862	200,255
	71,083	198,204
	71,286	193,554
	67,953	184,595
	68,697	176,964
	67,949	174,580
	61,257	163,906
	57,352	155,691
	48,111	141,859
	42,453	127,358

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
Jan-14	0.932	15.777	0.942	0.211	2.869	2.622	44.369	2.649	0.593	8.067
Feb-14	0.988	16.728	0.999	0.224	3.042	2.696	45.628	2.725	0.610	8.296
Mar-14	0.953	16.122	0.963	0.216	2.931	2.770	46.882	2.800	0.627	8.524
Apr-14	0.965	16.337	0.976	0.218	2.970	2.768	46.839	2.797	0.626	8.516
May-14	0.976	16.520	0.986	0.221	3.004	2.773	46.927	2.802	0.627	8.532
Jun-14	0.997	16.879	1.008	0.226	3.069	2.778	47.009	2.807	0.628	8.547
Jul-14	1.015	17.176	1.026	0.230	3.123	2.850	48.239	2.881	0.645	8.771
Aug-14	0.994	16.822	1.005	0.225	3.059	2.810	47.558	2.840	0.636	8.647
Sep-14	1.071	18.125	1.082	0.242	3.296	2.910	49.246	2.941	0.658	8.954
Oct-14	1.085	18.366	1.097	0.246	3.339	2.935	49.672	2.966	0.664	9.031
Nov-14	1.130	19.115	1.141	0.256	3.475	3.048	51.580	3.080	0.690	9.378
Dec-14	1.163	19.681	1.175	0.263	3.578	3.190	53.978	3.223	0.722	9.814
Jan-15	1.234	20.878	1.247	0.279	3.796	3.290	55.682	3.325	0.744	10.124
Feb-15	1.255	21.242	1.268	0.284	3.862	3.349	56.680	3.385	0.758	10.305
Mar-15	1.208	20.438	1.220	0.273	3.716	3.319	56.171	3.354	0.751	10.213
Apr-15	1.178	19.939	1.191	0.267	3.625	3.285	55.596	3.320	0.743	10.108
May-15	1.182	19.996	1.194	0.267	3.636	3.208	54.292	3.242	0.726	9.871
Jun-15	1.126	19.061	1.138	0.255	3.466	3.060	51.779	3.092	0.692	9.414
Jul-15	1.139	19.270	1.151	0.258	3.504	2.933	49.638	2.964	0.664	9.025
Aug-15	1.126	19.060	1.138	0.255	3.465	2.894	48.970	2.924	0.655	8.904
Sep-15	1.015	17.183	1.026	0.230	3.124	2.717	45.976	2.745	0.615	8.359
Oct-15	0.951	16.087	0.961	0.215	2.925	2.581	43.671	2.608	0.584	7.940
Nov-15	0.797	13.495	0.806	0.180	2.454	2.351	39.791	2.376	0.532	7.235
Dec-15	0.704	11.908	0.711	0.159	2.165	2.111	35.724	2.133	0.478	6.495

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

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

**Platforms Gina and Gilda Crew and Supply Boats
January - December 2015
Log of Boats Operating**

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

Crew Boats:

Capt T Le
Patrick
Ryan T
Alan T

Supply Boats:

Ryan T

Boat Engines:

Ryan T

4 - 567 BHP Scania Model DI16M, Main Engines
2 - 40 BHP Alaska Diesel Northern Light Model M30CW3, Generator Engines
Total BHP 2348

Cap T Le

3 - 567 BHP Scania Model DI16M, Main Engines
2 - 40 BHP Alaska Diesel Northern Light Model M30CW3, Generator Engines
Total BHP 1781

Alan T

3 - 567 BHP Scania Model DI16M, Main Engines
2 - 40 BHP Alaska Diesel Northern Light Model M30CW3, Generator Engines
Total BHP 1781

Patrick

3 - 567 BHP Scania Model DI16M, Main Engines
2 - 42.9 BHP Kohler Model 32EOZD, Generator Engines
Total BHP 1787

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

	Total Usage	12 Mo 'Running' Total	12 Mo 'Running' Total	
	Gasoline	Gasoline	Gina 50%	Gilda 50%
	gallons	gallons	gallons	gallons
Jan-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
Apr-15	0.00	0.0	0.00	0.00
May-15	0.00	0.0	0.00	0.00
Jun-15	0.00	0.0	0.00	0.00
Jul-15	0.00	0.0	0.00	0.00
Aug-15	0.00	0.0	0.00	0.00
Sep-15	0.00	0.0	0.00	0.00
Oct-15	0.00	0.0	0.00	0.00
Nov-15	0.00	0.0	0.00	0.00
Dec-15	0.00	0.0	0.00	0.00

Permit limit per Platform (gallons/year)	500	500
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Note: Starting in 6/08, fuel use calculated based on hourly usage and rate of 0.5 gallon/hour
 Boom Boat is physically located on Platform Gilda.
 Fuel use is split 50/50 between Platforms Gina and Gilda.

Boom Boat no longer in service; Applications to de-permit boom boat 01491-341 and 0194-401 deemed complete as of 9/10/2015.

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

FACILITY: DCOR PLATFORM GILDA						PERMIT#: 1492
Method of Inspection: TVA	Components	Valves	Others	Pumps	Compres.	PRV's
	Accessible Inspected:	2,820	18,267	0	3	0
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A
	Total # Leaking:	0	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)
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No Reportable Leaks for this Quarter

Inspection on 03/05/2015

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
 Report for the 2nd Quarter of 2015

FACILITY: <u>DCOR PLATEFORM GILDA</u>						PERMIT#: <u>1492</u>
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's
	Accessible Inspected:	2,820	18,267	0	3	0
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A
	Total # Leaking:	0	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)
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No Reportable Leaks for this Quarter

Inspection on 06/03/2015

**VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
Report for the 3rd Quarter of 2015**

FACILITY: DCOR PLATFORM GILDA						PERMIT#: 1492	
Method of Inspection: TVA	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	2,820	18,267	0	3	0	
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	
	Total # Leaking:	0	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)
No Reportable Leaks for this Quarter							
Inspection on 09/03/2015							

VENTURA COUNTY APCD
 RULE 74.10
 COMPONENT LEAK REPORT
 Report for the 4th Quarter of 2015

FACILITY: DCOR, PLATFORM, GILDA	PERMIT#: 1492					
Method of Inspection:	Components	Valves	Others	Pumps	Compres.	PRV's
TVA	Accessible Inspected:	2,820	18,267	0	3	0
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A
	Total # Leaking:	0	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)
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No Reportable Leaks for this Quarter

Inspection on 10/27/2015

PLATFORM GILDA
Visible Emissions Inspection Record - VCAPCD

Date	Time	Inspected by	Emission Unit	Observations/Corrective Action
24-Nov-15	12:25 - 12:28	Jesse Vanhoy	Standby Generator	No Visible Emissions
24-Nov-15	10:00 - 10:03	Jesse Vanhoy	HTM Heater	No Visible Emissions
24-Nov-15	12:40 - 12:43	Jesse Vanhoy	Flare	No Visible Emissions
24-Nov-15	12:00 - 12:03	Jesse Vanhoy	South Crane	No Visible Emissions
24-Nov-15	11:15 - 11:18	Jesse Vanhoy	North Crane	No Visible Emissions

**PLATFORM GILDA
FLARE USAGE
100 MMBtu/hr Flare**

	Pilot	Planned	Unplanned	12 Month 'Rolling' Total	
	MCF	MCF	MCF	Pilot MMCF	Planned MMCF
Jan-14	22	56	13	0.27	0.28
Feb-14	20	0	17	0.27	0.28
Mar-14	22	0	6	0.27	0.28
Apr-14	21	9	2510	0.27	0.29
May-14	23	0	4233	0.26	0.29
Jun-14	22	0	10832	0.26	0.29
Jul-14	29	0	3451	0.26	0.29
Aug-14	17	284	14	0.26	0.38
Sep-14	22	200	119	0.26	0.58
Oct-14	23	0	263	0.26	0.58
Nov-14	22	0	17	0.26	0.58
Dec-14	24	0	1408	0.26	0.55
Jan-15	29	2	940	0.27	0.50
Feb-15	28	0	431	0.28	0.50
Mar-15	33	0	287	0.29	0.50
Apr-15	29	0	384	0.30	0.49
May-15	30	8	23	0.31	0.49
Jun-15	30	61	2570	0.32	0.56
Jul-15	32	49	236	0.32	0.60
Aug-15	30	0	115	0.33	0.32
Sep-15	29	5	2073	0.34	0.13
Oct-15	32	0	30527	0.35	0.13
Nov-15	39	0	263	0.36	0.13
Dec-15	36	56	2062	0.38	0.18

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

Monthly Flare Logs
Supporting Documentation
PC1
Rule 54.B.1, 54.B.2

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.							Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		January-15	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS			
1/1/15	0:30	9:30	378	0	Gas line S/I @ MOSF	Unplanned	JS			
1/2/15	0:00	6:30	270	0	Gas line S/I @ MOSF	Unplanned	JH			
1/3/15	8:30	9:30	34	0	Gas line S/I @ MOSF	Unplanned	JS			
1/4/15	6:35	10:25	160	0	Gas line S/I @ MOSF	Unplanned	JS			
1/10/15	12:00	16:17	56	60	Amine Plant shut down	Unplanned	LV			
1/11/15	16:07	16:08	2	0	Amine plant shut down	Unplanned	LV			
1/19/15	12:41	12:45	2	0	Switching gas compressors, testing Vibration Safety High	Planned	JS			
1/25/15	22:00	24:00	40	50	Amine Plant shut down	Unplanned	LV			

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

PLATFORM GILDA FLARE LOG

DATE	START TIME	STOP TIME	VOLUME (MCF)	Record H2S ppm.		Reason for Flare	February-15	
				Estimated or Measured H2S (PPM)			PLANNED OR UNPLANNED	OPERATOR INITIALS
						Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		
2/1/15	20:50	21:00	5	0		PSL ALARM OIL LINE	Unplanned	F.S.
2/11/15	14:00	15:00	40	160		Amine Plant Shut down	Unplanned	B.M.
2/11/15	16:00	16:30	20	160		Amine Plant Shut down	Unplanned	B.M.
2/15/15	15:03	15:08	5	0		HIGH H2S Alarm WR.#4 NONE DETECTED	Unplanned	F.S.
2/16/15	0:32	0:42	6	0		FIRE ALARM CONFIRMED FALSE	Unplanned	J.H.
2/22/15	8:05	8:40	97	120		HIGH H2S ON SALES BACK FLOW GAS LINE	Unplanned	JW
2/26/15	9:15	13:00	155	0		SO2 FAULTY SENSOR AMINE UPSET	Unplanned	RT
2/27/15	6:30	12:00	103	125		Amine Plant Upset	Unplanned	RT

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

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.						March-15	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
3/4/15	7:30	13:00	220	285	Amine Plant Upset	Unplanned	RT
3/14/15	13:40	14:45	52	230	MOSF GAS LINE S/I	Unplanned	JS
3/15/15	7:18	7:22	3	0	PSL Alarm OIL LINE	Unplanned	FS
3/22/15	8:30	8:31	2	0	PARTIAL PLATFORM SHUTDOWN	Unplanned	LV
3/29/15	5:48	5:53	5	0	AMINE PLANT SHUT DOWN	Unplanned	JH
3/30/15	17:16	17:21	5	0	SO2 HIGH PPM ALARM (False)	Unplanned	RT

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

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		April-15	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
4/6/15	23:20	23:59	6	120	Vapor compressor shut down. Vent well clean tank	Unplanned	B.M.	
4/7/15	0:00	7:10	44	120	Vapor compressor shut down. Vent well clean tank	Unplanned	B.M.	
4/7/15	4:36	4:40	7	0	Partial platform shut down. Electrician in PLC.	Unplanned	B.M.	
4/7/15	8:30	23:59	106	120	Vapor compressor shut down. Vent well clean tank	Unplanned	B.M.	
4/8/15	0:00	13:00	82	120	Vapor compressor shut down. Vent well clean tank	Unplanned	B.M.	
4/9/15	14:23	16:52	119	80	HTM shut down. Troubleshoot and flare Amine Plant	Unplanned	J.S.	
4/12/15	10:25	10:36	15	0	Partial platform shut down due to Amine Plant Upset.	Unplanned	FS	
4/29/15	11:30	11:34	5	0	High SO2 Alarm at chemical skid. Sensor electrical issue	Unplanned	JC	

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

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.						Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		May-15	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS		
5/1/15	8:01	8:03	2	0	Amine plant partial shut down. Reset plant	Unplanned	B.M.		
5/3/15	11:07	11:12	8	0	Partial platform shut down from SO2 alarm sensor fault	Unplanned	B.M.		
5/4/15	23:38	23:43	9	0	Gas Compressor #2 shut down	Unplanned	JW		
5/8/15	13:23	13:28	5	0	S/D GC-#2 to Test Annual with BSEE	Planned	JS		
5/11/15	14:33	14:36	3	0	S/D GC-#2 to Test Annual with BSEE	Planned	JS		
5/13/11	13:02	13:05	4	0	Platform S/D - Due to PSL Alarm on Oil Line	Unplanned	JS		

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

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.						June-15	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
6/8/15	20:07	20:12	5	0	PSH Alarm on Shipping Tank	Unplanned	JH
6/13/15	22:35	22:40	9	0	GC-#2 S/D - High SO2 Alarm	Unplanned	JW
6/15/15	15:28	15:31	16	0	Working on SO2 Pumps - High SO2 Alarm	Unplanned	BM
6/16/15	8:50	9:00	61	0	Planned S/D at MOSF for Electrical Repairs	Planned	BM
6/16/15	17:30	18:05	129	0	MOSF Gas Line S/I	Unplanned	BM
6/16/15	18:52	21:00	240	0	MOSF Gas Line S/I	Unplanned	JW
6/16/15	21:00	24:00	188	0	MOSF Gas Line S/I	Unplanned	JW
6/17/15	0:00	10:40	867	0	MOSF Gas Line S/I	Unplanned	BM
6/18/15	12:00	12:05	5	0	PSH Alarm on Shipping Tank	Unplanned	RT
6/22/15	8:05	13:45	530	25	MOSF Gas Line S/I	Unplanned	FS
6/22/15	20:45	24:00	125	1	MOSF Gas Line S/I	Unplanned	FS
6/23/15	6:00	8:35	298	5	MOSF Gas Line S/I	Unplanned	RT
6/24/15	8:36	8:40	8	0	High SO2 Alarm	Unplanned	RT
6/24/15	10:30	12:10	104	14	Amine Plant Upset / HTM Down	Unplanned	RT
6/24/15	13:00	14:30	46	0	Amine Plant Up-Set	Unplanned	RT

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

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.				Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		July-15	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
7/1/15	13:30	13:30	32	0	Start up platform MOSF electrical repair	Planned	LV
7/5/15	9:00	10:10	12	180	Vapor Compressor Maintenance	Planned	RP
7/5/15	18:13	19:16	11	120	Change Hot Oil in HTM (down)	Unplanned	FS
7/6/15	10:05	10:28	5	195	Vapor comp maintenance	Planned	FS
7/17/15	10:40	15:00	170	64	HTM down testing HTM	Unplanned	RT
7/18/15	15:04	15:19	12	0	Power flicker	Unplanned	RT
7/25/15	5:45	5:55	17	0	Amine Plant Upset	Unplanned	JW
7/29/15	8:43	8:49	9	0	H2S High Alarm due to sensor failure	Unplanned	BM
7/31/15	4:01	4:04	2	0	Amine plant Upset	Unplanned	AD
7/31/15	9:57	10:12	15	0	H2S High Alarm due to sensor failure	Unplanned	JH

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

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.						August-15	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
8/5/15	22:59	23:00	15	0	SO2 High Alarm	Unplanned	ad
8/10/15	8:50	8:52	2	0	H2S High Alarm due to sensor failure	Unplanned	lv
8/16/15	3:20	5:45	94	200	Power Flicker	Unplanned	fs
8/24/15	19:30	19:32	2	0	Partial Platform Shutdown	Unplanned	lv
8/26/15	14:00	14:02	2	0	Partial Platform Shutdown	Unplanned	th
<p>A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an MMS Variance.</p>							

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.					September-15		
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
9/11/15	10:47	10:49	2	0	Partial Platform Shut Down from GC#3 low oil level	Unplanned	R.T.
9/11/15	19:30	19:40	10	0	Electrical Fault at Power Distribution Module	Unplanned	R.T.
9/12/15	3:00	12:00	316	0	Amine Plant Upset	Unplanned	R.T.
9/13/15	21:30	21:45	15	0	Amine Plant Shut down Switching amine pumps	Unplanned	J.H.
9/21/15	12:07	12:09	3	0	Partial Platform Shut Down	Unplanned	L.V.
9/24/15	15:30	15:35	5	0	Planned Edison Shut Down	Planned	JC
9/29/15	18:30	23:59	515	30	MOSF Gas line shut-in	Unplanned	JC
9/30/15	0:00	8:30	510	20	MOSF Gas line shut-in	Unplanned	JC
9/30/15	12:00	23:59	702	20	MOSF Gas line shut-in	Unplanned	JC

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

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.					Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		October-15	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS	
10/1/15	0:00	9:10	917	0	MOSF Gas Line Shut In	Unplanned	B.M.	
10/1/15	13:26	13:29	5	0	Partial Platform Shut down	Unplanned	B.M.	
10/1/15	14:10	24:00	280	0	MOSF Gas Line Shut In	Unplanned	LV	
10/2/15	0:00	14:27	954	40	MOSF Gas Line Shut In	Unplanned	B.M.	
10/2/15	16:32	24:00	330	0	MOSF Gas Line Shut In	Unplanned	LV	
10/3/15	0:00	14:25	865	0	MOSF Gas Line Shut In	Unplanned	B.M.	
10/3/15	16:30	24:00	419	0	MOSF Gas Line Shut In	Unplanned	LV	
10/4/15	0:00	14:30	870	0	MOSF Gas Line Shut In	Unplanned	B.M.	
10/4/15	16:50	24:00	346	0	MOSF Gas Line Shut In	Unplanned	LV	
10/5/15	0:00	4:30	262	0	MOSF Gas Line Shut In	Unplanned	LV	
10/5/15	6:30	16:30	600	0	MOSF Gas Line Shut In	Unplanned	B.M.	
10/5/15	18:20	24:00	320	0	MOSF Gas Line Shut In	Unplanned	LV	
10/6/15	0:00	16:15	975	0	MOSF Gas Line Shut In	Unplanned	B.M.	
10/6/15	19:00	24:00	309	0	MOSF Gas Line Shut In	Unplanned	LV	
10/7/15	0:00	14:30	870	0	MOSF Gas Line Shut In	Unplanned	B.M.	
10/7/15	17:15	24:00	370	0	MOSF Gas Line Shut In	Unplanned	LV	
10/8/15	0:00	8:30	826	0	MOSF Gas Line Shut In	Unplanned	RT	
10/8/15	11:00	24:00	911	0	MOSF Gas Line Shut In	Unplanned	AD	
10/9/15	2:40	10:10	791	0	MOSF Gas Line Shut In	Unplanned	RT	
10/9/15	10:10	13:25	205	0	MOSF Gas Line Shut In	Unplanned	RT	
10/10/15	0:00	2:00	280	0	MOSF Gas Line Shut In	Unplanned	AD	
10/10/15	3:45	16:45	812	0	MOSF Gas Line Shut In	Unplanned	RT	
10/11/15	0:00	6:30	780	0	MOSF Gas Line Shut In	Unplanned	AD	
10/12/15	0:00	2:30	360	0	MOSF Gas Line Shut In	Unplanned	RT	
10/12/15	4:30	16:00	795	0	MOSF Gas Line Shut In	Unplanned	RT	
10/12/15	18:15	14:20	1420	0	MOSF Gas Line Shut In	Unplanned	RT	
10/13/15	16:45	12:45	1260	0	MOSF Gas Line Shut In	Unplanned	RT	
10/14/15	12:45	15:00	380	0	MOSF Gas Line Shut In	Unplanned	RT	
10/15/15	0:00	12:15	791	0	MOSF Gas Line Shut In	Unplanned	B.M.	

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.				October-15			
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
10/16/15	0:00	8:30	546	0	MOSF Gas Line Shut In	Unplanned	B.M.
10/16/15	9:30	15:00	289	0	MOSF Gas Line Shut In	Unplanned	B.M.
10/16/15	18:20	24:00	354	0	MOSF Gas Line Shut In	Unplanned	JW
10/17/15	0:00	12:15	735	0	MOSF Gas Line Shut In	Unplanned	B.M.
10/17/15	15:45	24:00	516	0	MOSF Gas Line Shut In	Unplanned	JW
10/18/15	0:00	12:30	750	0	MOSF Gas Line Shut In	Unplanned	B.M.
10/18/15	17:00	0:00	520	0	MOSF Gas Line Shut In	Unplanned	JW
10/19/15	0:00	14:15	915	0	MOSF Gas Line Shut In	Unplanned	B.M.
10/19/15	17:10	24:00	427	0	MOSF Gas Line Shut In	Unplanned	JW
10/20/15	0:00	14:05	904	0	MOSF Gas Line Shut In	Unplanned	B.M.
10/20/15	17:45	24:00	391	0	MOSF Gas Line Shut In	Unplanned	JW
10/21/15	0:00	13:05	840	0	MOSF Gas Line Shut In	Unplanned	B.M.
10/21/15	16:30	24:00	469	0	MOSF Gas Line Shut In	Unplanned	JW
10/22/15	0:00	8:25	415	0	MOSF Gas Line Shut In	Unplanned	RT
10/22/15	10:10	16:25	390	0	MOSF Gas Line Shut In	Unplanned	RT
10/25/15	17:00	24:00	73	800	Vapor Compressor problems	Unplanned	JH
10/26/15	0:00	7:20	75	865	Vapor Compressor problems	Unplanned	RT
10/26/15	7:20	24:00	363	170	Vapor compressor problems	Unplanned	RT
10/27/15	0:00	24:00	1488	6.5	MOSF Gas Line Shut In	Unplanned	RT
10/28/15	0:00	9:45	604	16	MOSF Gas Line Shut In	Unplanned	JH
10/28/15	9:45	24:00	148	7	Vapor Compressor Out Of Service	Unplanned	JH
10/29/15	0:00	24:00	201	10	Vapor Compressor Out Of Service	Unplanned	BM
10/30/15	0:00	24:00	216	24	Vapor Compressor Out Of Service	Unplanned	BM
10/31/15	0:00	24:00	95	32	Vapor Compressor Out Of Service	Unplanned	BM

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

PLATFORM GILDA FLARE LOG

Record all flaring > 10 minutes. Record H2S ppm.				Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		December-15	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flare	PLANNED OR UNPLANNED	OPERATOR INITIALS
12/4/15	8:28	8:31	3	0	Faulty H2S sensor platform shutdown	Unplanned	rt
12/8/15	17:00	19:35	56	0	Platform Start-up. Planned s/d.	Planned	fs
12/11/15	7:42	7:44	3	0	GC 2 s/d	Unplanned	jw
12/13/15	17:25	17:28	3	0	Power Flicker GC #2 shut-down	Unplanned	jw
12/14/15	0:00	0:03	3	0	Gas line shut in @ mosf.	Unplanned	bm
12/15/15	2:20	7:05	249	0	Amine Plant upset	Unplanned	bm
12/19/15	16:00	16:30	14	100	MOSF Gas Line Shut-in	Unplanned	jh
12/20/15	6:00	9:45	250	0	Amine Plant Upset	Unplanned	rt
12/21/15	10:45	17:45	405	132	MOSF Gas Line shut-in	Unplanned	jh
12/24/15	4:30	9:30	287	220	Gas Compressor #2 shut-down	Unplanned	bm
12/24/15	14:55	15:59	4	0	MOSF gas line shut in	Unplanned	bm
12/26/15	3:15	8:35	293	0	MOSF gas line shut in	Unplanned	jw
12/29/15	4:55	9:15	238	0	MOSF gas line shut in	Unplanned	bm
12/30/15	3:30	8:55	296	0	MOSF gas line shut in	Unplanned	bm
12/31/15	16:15	16:35	14	0	Gas Compressor #2 Shut-down	Unplanned	fs

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