



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

May 13, 2017

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, 2016 through March 31, 2017.

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**  
**2016 ANNUAL COMPLIANCE**  
**CERTIFICATION REPORT**  
**For the time period 4/1/16 – 3/31/17**

**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**

**2016**

**COMPLIANCE VERIFICATION REPORT**

**for the time period 4/1/16 – 3/31/17**

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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: VP-OPERATIONS	Date: 5.11.17
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Time Period Covered by Compliance Certification 04/01/2016 (MM/DD/YY) to 03/31/2017 (MM/DD/YY)
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**SECTION 1**  
**Compliance Certification**

### 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.c, 74.10	<ul style="list-style-type: none"> <li>•Annual compliance certification 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	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.4 N1	Rules 71.4.B.2 and 74.10	<ul style="list-style-type: none"> <li>Verbal notice of maintenance operations</li> <li>Rule 74.10 inspections</li> <li>Annual compliance certification including verifying the integrity of the cover</li> </ul>	<ul style="list-style-type: none"> <li>Records of maintenance</li> <li>Rule 74.10 records</li> </ul>	None	None	
74.9N9	Rule 74.9.D.9	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Routine surveillance to ensure diesel-fired engine is used to power cranes and welding equipment only</li> </ul>	<ul style="list-style-type: none"> <li>Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location</li> </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 Gima 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>Annual compliance certification</li> <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
PO149 PC3 - 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	
PO149 PC3 - 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; 3 min 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>	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.1.C	Rules 71.1.C and 74.10	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Rule 74.10 inspections</li> <li>Visual inspection to ensure collection system is closed</li> <li>Quarterly inspection of flare to ensure proper operation</li> </ul>	<ul style="list-style-type: none"> <li>Records of inspections of flare</li> <li>Rule 74.10 records</li> </ul>	None	None	<ul style="list-style-type: none"> <li>Compliance with Rule 74.10 ensures compliance with the gas collection system's maintenance requirements</li> </ul>
71.4.B.1	Rule 71.4.B.1	<ul style="list-style-type: none"> <li>Annual compliance certification to ensure there are no first stage 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>Maintain current solvent information</li> <li>Routine surveillance of solvent cleaning activities</li> <li>Upon request, solvent testing</li> </ul>	<ul style="list-style-type: none"> <li>Records of current solvent information</li> </ul>	None	<ul style="list-style-type: none"> <li>ROC 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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### **Breakdowns, Deviations, and Excess Emissions**

**PTO 1491: PLATFORM GINA**

Reporting Period: April 1, 2016 through March 31, 2017

There were four (4) Breakdown Reports 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 (lbs)	ROC (lbs)	CO (lbs)	SOx (lbs)	PM (lbs)	PM10 (lbs)
	0	0	0	0	0	0



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04/01/16 to 09/30/16  
(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>5/2/2016</u> <u>9:00 PM</u></p> <p>End <u>5/2/2016</u> <u>10:50 PM</u></p> <p>When Discovered: Date &amp; Time</p> <p><u>5/2/2016</u> <u>9:00 PM</u></p>
<p>D. Parameters monitored:</p> <p>Vapor recovery compressor operations</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 all production was diverted directly to oil pipeline and there was no venting.</p>
<p>G. Probable Cause of Deviation</p> <p>A SCE power outage caused a complete shut-down of all oil and gas production facilities, including the vapor recovery compressor</p>		<p>H. Corrective actions taken:</p> <p>All oil and gas production was shut-in during the outage and as a result there were no excess emissions because the various tanks and Wemco experienced no venting.</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>8/31/2016</u> <u>4:10 PM</u></p> <p>End <u>8/31/2016</u> <u>10:40 PM</u></p> <p>When Discovered: Date &amp; Time</p> <p><u>8/31/2016</u> <u>4:10 PM</u></p>
<p>D. Parameters monitored:</p> <p>Vapor recovery compressor operations</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 all production was diverted directly to oil pipeline and there was no venting.</p>
<p>G. Probable Cause of Deviation</p> <p>A level switch problem on MBF-104 caused a electric breaker to trip, causing computer monitoring capabilities to be lost. As a safety precaution, the platform is automatically shut-down, including the vru compressor.</p>		<p>H. Corrective actions taken:</p> <p>A fuse was replaced, the breaker was reset, the computer monitoring system was restored, and the vru compressor and the platform oil and gas production activities were started back up. No excess emissions as the various tanks and Wemco experienced no venting.</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>10/4/2016</u> <u>11:25 AM</u></p> <p>End <u>10/4/2016</u> <u>11:53 AM</u></p> <p>When Discovered: Date &amp; Time</p> <p><u>10/4/2016</u> <u>11:25 AM</u></p>
<p>D. Parameters monitored:</p> <p>Vapor recovery compressor operations</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 all production was diverted directly to oil pipeline and there was no venting.</p>
<p>G. Probable Cause of Deviation</p> <p>A blown fuse in the electrical control panel for the Process Logic Control (PLC) System caused the platform computer monitoring capabilities to go down. As a safety precaution, the platform is automatically shut-down, including the vru compressor.</p>		<p>H. Corrective actions taken:</p> <p>The fuse was replaced, the breaker was reset, the computer monitoring system was restored, and the vru compressor and the platform oil and gas production activities were started back up. No excess emissions as the various tanks and Wemco experienced no venting.</p>





Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04/01/16 to 03/31/17  
(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>2/2/2017</u> <u>9:00 AM</u></p> <p>End <u>2/2/2017</u> <u>10:00 AM</u></p> <p>When Discovered: Date &amp; Time</p> <p><u>2/2/2017</u> <u>9:00 AM</u></p>
<p>D. Parameters monitored:</p> <p>Vapor recovery compressor operations</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 all production was diverted directly to oil pipeline and there was no venting.</p>
<p>G. Probable Cause of Deviation</p> <p>A Process Logic Control (PLC) System failure caused the platform computer monitoring capabilities to go down and as a safety precaution all oil and gas production, including the vru compressor is shut down.</p>		<p>H. Corrective actions taken:</p> <p>The PLC system was restarted, computer monitoring was restored, and the vru compressor was started back up before production was resumed.</p>
<p>A. Attachment # or Permit Condition #:</p>	<p>B. Equipment description:</p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin _____</p> <p>End _____</p> <p>When Discovered: Date &amp; Time</p> <p>_____</p>
<p>D. Parameters monitored:</p>	<p>E. Limit</p>	<p>F. Actual:</p>
<p>G. Probable Cause of Deviation</p>		<p>H. Corrective actions taken:</p>
<p>A. Attachment # or Permit Condition #:</p>	<p>B. Equipment description:</p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin _____</p> <p>End _____</p> <p>When Discovered: Date &amp; Time</p> <p>_____</p>
<p>D. Parameters monitored:</p>	<p>E. Limit</p>	<p>F. Actual:</p>
<p>G. Probable Cause of Deviation</p>		<p>H. Corrective actions taken:</p>

**SECTION 3**  
**Specific Applicable Requirements**

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## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>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>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>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 PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 74.9N9</p>	<p>D. Frequency of monitoring:  Daily</p>
<p>B. Description:  Stationary Internal Combustion Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  N/A</p>
<p>C. Method of monitoring:  All crane and welder IC engines are diesel fired. These engines are used to power the cranes and welders only.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: ATCM Engine N3</p>	<p>D. Frequency of monitoring:  Daily, Annually</p>
<p>B. Description:  Stationary Internal Combustion Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  N/A</p>
<p>C. Method of monitoring:  Use of CARB Diesel; Recordkeeping.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

<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></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 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</p>
<p>C. Method of monitoring:  Minimize engine idle time. Comply with applicable emission standards. Use of nonroad diesel. Initial performance test. Recordkeeping.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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

**SECTION 4**

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**Permit Specific Conditions**



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

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

<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 5</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description:  Crew and Work Boat Emission Limits: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring:  Daily records of diesel fuel consumption and emission calculations using Ventura County APCD approved emission factors. Fuel consumption is determined through either inline non-resettable meter or onboard daily soundings.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

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





## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

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

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

<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 9</p>	<p>D. Frequency of monitoring:  Monthly</p>
<p>B. Description:  Solvent Recordkeeping: Rules 23 and 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  N/A</p>
<p>C. Method of monitoring:  Monthly records maintained of quantity of solvent use and purchases for solvents with ROC content of 25 grams per liter or greater. Chemco 33-S has ROC content of 44 grams/liter and is only used when diluted 1:1 with water. No other solvents with ROC content of 25 grams per liter or greater were used during the reporting period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></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></p> <p>*If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 2 Section 1, 2, and 5</p>	<p>D. Frequency of monitoring: <b>Monthly</b></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 1491 Condition 2 Sections 3 and 4</p>	<p>D. Frequency of monitoring: <b>Monthly</b></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></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 3 Sections 1</p>	<p>D. Frequency of monitoring:  Monthly, Annually</p>
<p>B. Description:  40 CFR Part 63, Subpart ZZZZ, NESHAPS RICE MACT for Backup Utility Generator</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  N/A</p>
<p>C. Method of monitoring:  Monitoring of all reasons for use (i.e., loss of grid electricity or loss of stationary source's own power production).</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></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></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 3 Sections 2 and 3</p>	<p>D. Frequency of monitoring:  Monthly and 12-Month Rolling Average</p>
<p>B. Description:  New Source Review: Rule 26; and, Stationary Internal Combustion Engines: Rule 74.9</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</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></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></p> <p>*If yes, attach Deviation Summary Form</p>

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

**SECTION 5**

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**General Applicable Requirements**



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 71.1.C</p>	<p>D. Frequency of monitoring: Daily, Quarterly, Annually</p>
<p>B. Description:  Crude Oil Production and Separation</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Produced gas must be controlled at all times and is verified through the daily visual and periodic maintenance of the produced gas collection system on Platform Gina. Produced gas is either directed to sales, vapor compressor or flare. Compliance with Rule 74.10 ensures that various components are not leaking. The produced gas stream is a fully controlled closed loop system.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>I</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 71.4.B1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description:  Petroleum Sumps, Pits, and Well Cellars - First Stage Sump Prohibition</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring:  There are no first stage sumps on Platform Gina. Offshore platforms are equipped with non-leaking stuffing boxes, oil is never stored in an open "pit" or cellar.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></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 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>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 74.6</b></p>	<p>D. Frequency of monitoring: <b>Monthly</b></p>
<p>B. Description:  <b>Surface Cleaning and Degreasing</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>N/A</b></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: <b>Daily, Quarterly, Annually</b></p>
<p>B. Description:  <b>Components at Crude Oil and Natural Gas Production Processing Facilities</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>N/A</b></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: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Large Water Heaters and Small Boilers</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>N/A</b></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>





## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

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

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

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

## **SECTION 6**

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**General Requirements for Short-Term Activities**  
**General Permit Conditions**  
**Miscellaneous Federal Program Conditions**



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 74.1</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Abrasive Blasting</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></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: <b>Monthly Records, Annual Compliance Certification</b></p>
<p>B. Description:  <b>Architectural Coatings</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></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: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Oilfield Drilling Operations</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></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>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 61, Subpart M</p>	<p>D. Frequency of monitoring:  Annual Compliance Certification</p>
<p>B. Description:  National Emission Standard for Asbestos</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring:  No asbestos demolition or renovation activities took place during the period of 4/1/2015 through 3/31/2016.</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></p> <p>*If yes, attach Deviation Summary Form</p>

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 16 (MM/DD/YY) to 03 / 31 / 17 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 60, Subpart OOOO</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description:  NSPS for Crude Oil and Natural Gas Production, Transmission and Distribution</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring:  Compliance with Permit to Operate 1491 and VCAPCD Rules</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description:</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</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 #:</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description:</p>	<p>E. Source test reference method, if applicable Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</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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**SECTION 7**  
**Supporting Documentation**



**PLATFORM GINA DIESEL CRANE FUEL USAGE**

GINA	CRANE		
	325 bhp CAT 3406B		
	Hrs.	Gal.	12 Mo. Rolling Total Gal
Apr-15	23	154	939
May-15	14	75	945
Jun-15	8	53	958
Jul-15	11	75	971
Aug-15	6	46	939
Sep-15	8	46	931
Oct-15	8	51	885
Nov-15	11	71	894
Dec-15	10	52	906
Jan-16	6	47	791
Feb-16	8	50	801
Mar-16	6	37	757
Apr-16	6	41	643
May-16	9	57	625
Jun-16	9	60	632
Jul-16	13	89	646
Aug-16	14	84	683
Sep-16	9	62	699
Oct-16	8	56	703
Nov-16	14	78	782
Dec-16	6	17	728
Jan-17	7	43	719
Feb-17	6	37	710
Mar-17	6	40	700
Crane permit limits		2,870 gal/yr	

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

	HOURS		HOURS	
	Non-Emergency	Emergency	Monthly Total	Annual Total
Jan-16	1.0	0.0	1.0	1.0
Feb-16	2.7	0.0	2.7	3.7
Mar-16	0.6	0.0	0.6	4.3
Apr-16	0.7	0.0	0.7	5.0
May-16	0.7	1.6	2.3	7.3
Jun-16	0.7	9.8	10.5	17.8
Jul-16	0.8	0.0	0.8	18.6
Aug-16	1.0	0.0	1.0	19.6
Sep-16	0.7	0.0	0.7	20.3
Oct-16	1.0	0.0	1.0	21.3
Nov-16	1.0	0.0	1.0	22.3
Dec-16	0.9	0.0	0.9	23.2
Jan-17	1.3	0.0	1.3	1.3
Feb-17	0.8	0.0	0.8	2.1
Mar-17	0.8	0.0	0.8	2.9

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



**Condition  
Monitoring  
Services  
Inc.**

## STATIONARY IC EMISSION TEST

PREPARED FOR:



**DOS CUADRAS OFFSHORE RESOURCES**

DATE: December 20, 2016  
 QUARTER: 4th  
 FIELD TECHNICIAN: JESSE VANHOY  
 FUEL TYPE: #2 DIESEL

PLATFORM: GINA  
 EQUIPMENT: SEAKING CRANE  
 MANUFACTURER: CATERPILLAR  
 MODEL NUMBER : 3406

	RUN 1	RUN 2	RUN 3	AVERAGE	
RPM	1745	1745	1745	1745	
O2	12.89	12.06	12.92	12.6	
CO	32	29	24	28	
NX	796	862	804	821	<b>LIMIT</b>
<i>CO corrected to %15 O2</i>	24	19	18	20	49
<i>NX corrected to %15 O2</i>	586	575	594	585	

COMMENTS:

Readings were taken post-cat. Temperature: 522°F

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Field Test Data Transfer Log

15 - Minute- Raw Data Field Log

FACILITY NAME	DOS CUADRAS OFFSHORE RESOURCES	LOCATION:	Platform Gina
TEST:	CO Emissions Monitoring	UNIT:	Seaking Crane
ANALYZER MODEL:	TESTO T350 XL	ANALYZER SERIAL NO:	1136757

#	Date	Time	% O2	ppm CO	ppm Total NOX
1	12/20/2016	3:15 PM	12.89	32	796
2	12/20/2016	3:16 PM	12.81	33	824
3	12/20/2016	3:17 PM	12.48	31	874
4	12/20/2016	3:18 PM	12.84	30	822
5	12/20/2016	3:19 PM	12.06	29	862
6	12/20/2016	3:20 PM	12.85	29	822
7	12/20/2016	3:21 PM	13.23	26	795
8	12/20/2016	3:22 PM	12.48	28	871
9	12/20/2016	3:23 PM	13.44	28	760
10	12/20/2016	3:24 PM	12.92	24	804
11	12/20/2016	3:25 PM	12.57	28	844
12	12/20/2016	3:26 PM	12.80	28	856
13	12/20/2016	3:27 PM	13.28	26	745
14	12/20/2016	3:28 PM	12.98	26	807
15	12/20/2016	3:29 PM	13.04	26	748
16					
17					
18					
19					
20					

NOTES:

RPM 1745

	% O2	ppm CO	TOTAL NOX
RAW AVERAGES	12.84	28.27	815.33

	% O2	ppm CO	ppm TOTAL NOX
PERMIT LIMITS:	15	49	N/A
CORRECTED DATA:		20.70	597.18



**FIELD RUN TICKETS**

COMPANY: DOS CUADRAS OFFSHORE RESOURCES  
 RUN TYPE: COMBUSTION ANALYSIS  
 UNIT ID: PLATFORM GINA - SEAKING CRANE  
 DATE: 12/20/2016

*CMA*

-----  
 Testo t350 XL  
 Testo t350 XL  
 SN: 01136757 /USA  
 -----  
 NONAME  
 Settings:  
 Sample time: 15 min  
 Rinse time: 5 min  
 Data rate: 60 sec  
 Calc. Mean value: No  
 -----  
 from: 12/20/16 15:15:20  
 to: 12/20/16 15:30:35  
 -----  
 Number: 0015  
 Fueloil #2  
 -----

	Tf °F	O2 %	CO ppm
01	68.2	12.89	32
02	68.2	12.81	33
03	67.6	12.48	31
04	67.8	12.84	30
05	67.8	12.06	29
06	67.8	12.85	29
07	67.8	13.23	26
08	67.6	12.48	28
09	67.0	13.44	28
10	66.5	12.92	24
11	66.4	12.57	28
12	65.9	12.80	28
13	66.0	13.28	26
14	66.3	12.98	26
15	65.2	13.04	26

	NOx ppm	NO ppm	NO2 ppm
01	796	763	35.1
02	824	789	35.7
03	874	834	39.3
04	822	784	37.4
05	862	823	38.7
06	822	784	38.4
07	795	756	36.9
08	871	829	41.2
09	760	727	33.9
10	804	766	38.0
11	844	805	38.7
12	856	814	42.3
13	745	710	35.0
14	807	768	38.4
15	748	710	37.8

	Pump l/m	Batt V	O2rf %
01	1.17	8.5	15.0
02	1.16	8.5	15.0
03	1.16	8.5	15.0
04	1.16	8.5	15.0
05	1.16	8.5	15.0
06	1.15	8.5	15.0
07	1.15	8.5	15.0
08	1.15	8.4	15.0
09	1.14	8.5	15.0
10	1.15	8.6	15.0
11	1.15	8.5	15.0
12	1.14	8.6	15.0
13	1.14	8.6	15.0
14	1.14	8.6	15.0
15	1.14	8.3	15.0



### PLATFORM GINA VE INSPECTION LOG

Date	Start Time	End Time	Equipment										VISIBLE EMISSION? (YES/NO)	Visible Emission Inspection Performed By: Jesse Vanhoy		
			Seaking Crane	Production Standby Generator	Flare											
4/29/16	1:30 PM	1:33 PM			X										NO	<i>JV</i>
4/29/16	1:40 PM	1:43 PM		X											NO	
4/29/16	1:50 PM	1:53 PM	X												NO	

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

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	7/5/2014	5/30/15	5/27/16
Air Cleaner Inspection	7/5/2014	5/30/15	5/27/16
Belt Hose Inspection	7/5/2014	5/30/15	5/27/16

**Gina Emergency Generator**

Oil / Filter Change	6/3/2014	6/12/15	7/11/16
Air Cleaner Inspection	6/3/2014	6/12/15	7/11/16
Belt Hose Inspection	6/3/2014	6/12/15	7/11/16

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

**Crew Boat Fuel Usage**

	Total Fuel	Gina 25%	Gilda 75%
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
Jan-16	9,275	2,319	6,956
Feb-16	9,950	2,488	7,463
Mar-16	11,325	2,831	8,494
Apr-16	9,673	2,418	7,255
May-16	11,126	2,782	8,345
Jun-16	12,000	3,000	9,000
Jul-16	10,500	2,625	7,875
Aug-16	12,150	3,038	9,113
Sep-16	11,375	2,844	8,531
Oct-16	14,158	3,540	10,619
Nov-16	12,400	3,100	9,300
Dec-16	11,595	2,899	8,696
Jan-17	11,543	2,886	8,657
Feb-17	10,776	2,694	8,082
Mar-17	10,550	2,638	7,913
<b>2016 Total</b>	<b>33,882</b>	<b>101,645</b>	

**Supply Boat Fuel Usage**

	Gina		Gilda	
	Mains	Aux	Mains	Aux
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
Jan-16	0	0	0	0
Feb-16	23	1	68	3
Mar-16	1,266	53	3,798	158
Apr-16	0	0	0	0
May-16	0	0	0	0
Jun-16	48	2	144	6
Jul-16	0	0	0	0
Aug-16	1,675	70	5,024	209
Sep-16	0	0	0	0
Oct-16	0	0	0	0
Nov-16	0	0	0	0
Dec-16	1,368	57	4,104	171
Jan-17	1,644	69	4,932	206
Feb-17	766	32	2,299	96
Mar-17	0	0	0	0
<b>2016 Total</b>	<b>4,379</b>	<b>182</b>	<b>13,138</b>	<b>547</b>

	Rolling 12 Mo Total	
	Gina	Gilda
Apr-15	71,083	198,204
May-15	71,286	193,554
Jun-15	67,953	184,595
Jul-15	68,697	176,964
Aug-15	67,949	174,580
Sep-15	61,257	163,906
Oct-15	57,352	155,691
Nov-15	48,111	141,859
Dec-15	42,453	127,358
Jan-16	37,861	113,582
Feb-16	34,681	104,044
Mar-16	34,713	104,138
Apr-16	34,154	102,463
May-16	33,955	101,864
Jun-16	34,317	102,952
Jul-16	34,179	102,538
Aug-16	36,030	108,091
Sep-16	35,973	107,920
Oct-16	36,420	109,259
Nov-16	36,826	110,478
Dec-16	38,444	115,331
Jan-17	40,723	122,169
Feb-17	41,704	125,113
Mar-17	40,192	120,576

2016 Total **33,882** **101,645**

2016 Total **4,379** **182** **13,138** **547**

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-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	
Jan-16	0.628	10.620	0.634	0.142	1.931		1.883	31.860	1.902	0.426	5.793	
Feb-16	0.575	9.728	0.581	0.130	1.769		1.725	29.184	1.743	0.390	5.306	
Mar-16	0.575	9.737	0.581	0.130	1.770		1.726	29.211	1.744	0.391	5.311	
Apr-16	0.566	9.580	0.572	0.128	1.742		1.698	28.741	1.716	0.384	5.226	
May-16	0.563	9.524	0.569	0.127	1.732		1.688	28.573	1.706	0.382	5.195	
Jun-16	0.569	9.626	0.575	0.129	1.750		1.706	28.878	1.724	0.386	5.251	
Jul-16	0.567	9.587	0.573	0.128	1.743		1.700	28.762	1.718	0.385	5.229	
Aug-16	0.597	10.106	0.604	0.135	1.838		1.792	30.319	1.811	0.405	5.513	
Sep-16	0.596	10.091	0.603	0.135	1.835		1.789	30.272	1.808	0.405	5.504	
Oct-16	0.604	10.216	0.610	0.137	1.857		1.811	30.647	1.830	0.410	5.572	
Nov-16	0.610	10.330	0.617	0.138	1.878		1.831	30.989	1.851	0.414	5.634	
Dec-16	0.637	10.783	0.644	0.144	1.961		1.912	32.350	1.932	0.432	5.882	
Jan-17	0.675	11.423	0.682	0.153	2.077		2.025	34.268	2.046	0.458	6.231	
Feb-17	0.691	11.698	0.699	0.156	2.127		2.074	35.094	2.096	0.469	6.381	
Mar-17	0.666	11.274	0.673	0.151	2.050		1.999	33.821	2.020	0.452	6.149	

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  
April 2016 - March 2017  
Log of Boats Operating**

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

**Crew Boats:**

Capt T Le  
Ryan T  
Alan T

**Supply Boats:**

Ryan T  
Clean Ocean

**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

Clean Ocean  
2 - 750 BHP Cummins QSK19M, Main Engines  
2 - 162 BHP John Deere 4045AFM85, Generator Engines  
1 - 290 BHP Cummins QSL9, Auxiliary Bow Thruster.  
Total BHP           2114

**PLATFORM GINA  
FLARE USAGE**

MONTH	Pilot	Planned	Unplanned	12 Month 'Rolling' Total	
	SCF	MCF	MCF	Pilot MMSCF	Planned MMSCF
Apr-15		0	97	0.00	0.108
May-15		0	0	0.00	0.005
Jun-15		1	855	0.00	0.004
Jul-15		146	0	0.00	0.148
Aug-15		0	1222	0.00	0.148
Sep-15		0	974	0.00	0.148
Oct-15		0	15681	0.00	0.147
Nov-15		0	0	0.00	0.147
Dec-15		0	725	0.00	0.147
Jan-16		0	283	0.00	0.147
Feb-16		0	900	0.00	0.147
Mar-16		0	278	0.00	0.147
Apr-16		215	0	0.00	0.362
May-16		0	21	0.00	0.362
Jun-16		0	0	0.00	0.361
Jul-16		0	0	0.00	0.215
Aug-16		4	0	0.00	0.219
Sep-16		0	288	0.00	0.219
Oct-16		1	8	0.00	0.220
Nov-16		16	61	0.00	0.236
Dec-16		0	124	0.00	0.236
Jan-17		252	477.5	0.00	0.488
Feb-17		164	253	0.00	0.652
Mar-17		0	180.2	0.00	0.652

<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 Flaring Events**  
142 MMBtu/hr Flare

Flare Date	Planned flaring	MCF flared	H2S ppm	SO2 Emission factor lb/MMCF	SO2 Emissions lb
22-Apr-16	P	214	300	50.66	10.841
29-Apr-16	P	1	3	0.51	0.001
2-May-16		21	1	0.17	0.004
21-Aug-16	P	4	0	0.06	0.000
24-Sep-16		91.5	2	0.34	0.031
24-Sep-16		14.9	2	0.34	0.005
24-Sep-16		10	2	0.34	0.003
25-Sep-16		172	2	0.34	0.058
27-Oct-16	P	1	1	0.17	0.000
31-Oct-16		8	2	0.34	0.003
13-Nov-16	P	16	2	0.34	0.005
14-Nov-16		37	1	0.17	0.006
23-Nov-16		24	2	0.34	0.008
2-Dec-16		122	2	0.34	0.041
17-Dec-16		2	2	0.34	0.001
13-Jan-17		3.5	3.5	0.59	0.002
13-Jan-17	P	2	3.5	0.59	0.001
20-Jan-17	P	190	4	0.68	0.128
21-Jan-17	P	50	3	0.51	0.025
24-Jan-17		184	2.5	0.42	0.078
25-Jan-17		166	3	0.51	0.084
26-Jan-17		124	1	0.17	0.021
26-Jan-17	P	1	1	0.17	0.000
26-Jan-17	P	4	1	0.17	0.001
27-Jan-17	P	5	1	0.08	0.000
7-Feb-17		53	2	0.34	0.018
8-Feb-17		120	2	0.34	0.041
13-Feb-17	P	1	1	0.17	0.000
14-Feb-17	P	112	1	0.17	0.019
15-Feb-17	P	47	1	0.17	0.008
24-Feb-17	P	4	0.5	0.08	0.000
25-Feb-17		80	1	0.17	0.014
6-Mar-17		171	3	0.51	0.087
10-Mar-17		9.2	3	0.51	0.005

**TOTAL SULFUR EMISSIONS (lbs) 11.32**

**\*Planned Flaring = 652**

**Annual Limits:**

2,492 MCF/year (per VCAPCD, platform specific limit based on previous 5 years from when rules were written)

4.41 tons SOx/year (per PTO 1491, Table 4)

Monthly Flare Logs

Supporting Documentation  
PC 2, Rule 54.B1, 54.B2





















# PLATFORM GINA FLARE LOG

Record all flaring greater than 10 minutes. Record ppm, not "sweet" or "x"						Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour only if >300 ppm H2S		January-17	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME		
1/13/17	07:25	07:45	3.5	3.5	MOSF GAS Line Shut in	UNPLANNED	DAN		
1/13/17	11:20	11:35	2	3.5	TESTING NEW SOLENOID VALVE	PLANNED	DAN		
1/20/17	06:10	24:00	190	4	MOSF SHUT IN DUE TO MAINTENANCE WORK	PLANNED	TOM		
1/21/17	00:01	05:20	50	3	MOSF SHUT IN DUE TO MAINTENANCE WORK	PLANNED	JULIO		
1/24/17	04:45	09:10	184	2.5	MOSF GAS Line Shut in	UNPLANNED	TOM		
1/25/17	02:30	24:00	166	3	SENT SMART GAS PIG AND MOSF GAS LINE SHUT IN	UNPLANNED	TOM		
1/26/17	00:01	12:40	124	1	MOSF GAS LINE SHUT IN	UNPLANNED	TOM		
1/26/17	15:25	16:15	1.05	1	FLARE PILOT MAINTENANCE AND TESTING	PLANNED	JAIME		
1/26/17	18:25	24:00	4.25	1	FLARE PILOT MAINTENANCE AND TESTING	PLANNED	SCOTT		
1/27/17	00:01	06:00	5	0.5	FLARE PILOT MAINTENANCE AND TESTING	PLANNED	JAIME		

**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		February-17	
DATE	START TIME	STOP TIME	VOLUME (MCF)	Estimated or Measured H2S (PPM)	Reason for Flaring Event	PLANNED OR UNPLANNED	OPERATOR NAME		
2/7/17	17:55	24:00	53	2	WORK AT MOSF	UNPLANNED	JULIO		
2/8/17	00:01	13:45	120	2	WORK AT MOSF	UNPLANNED	TOM		
2/13/17	09:50	09:58	1	1	Testing Flare Pilot	PLANNED	Jaime		
2/14/17	04:25	16:35	112	1	WORK at MOSF	PLANNED	Scott		
2/15/17	12:30	17:30	47	1	WORK at MOSF	PLANNED	Scott		
2/24/17	04:25	04:35	4	0.5	MOSF GAS LINE shut in	PLANNED	Jaime		
2/25/17	12:45	09:00	80	1	MOSF GAS LINE shut in	UNPLANNED	Scott		

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







## Letter of Conformance

May 10, 2017

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

DCOR PLATFORM GINA FROM 4/1/2016-3/31/2017

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 SC Fuels. The sulfur Content is guaranteed to be less than .0015%. (15PPM) The high heat content is typically in the 19,950 - 20,200 BTU per pound range.

*Hope Bowles*

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



## Letter of Conformance

May 4, 2017

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, ALAN T, and CLEAN OCEAN FROM 4/1/2016-3/31/17 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

IAC Los Angeles  
 22934 Lockness Avenue  
 Torrance, California 90501 United States of America  
 T: 310-326-4429  
 F: 310-326-4470



**INSPECTORATE**

# Certificate of Analysis

<b>Vessel / Shore Tank :</b>	<b>Aeros Environmental Miscellaneous</b>	<b>Sample Submitted By :</b>	<b>Aeros Environmental</b>
<b>Product :</b>	<b>Diesel</b>	<b>Analysis Performed By :</b>	<b>IAC Los Angeles</b>
<b>Client Reference :</b>	<b>PO# 20719 / Project# 092-9749A</b>	<b>Date Sampled :</b>	<b>09-Aug-2016</b>
<b>Terminal / Port / Office:</b>	<b>Aeros Environmental, Inc.</b>	<b>Date Reported :</b>	<b>15-Aug-2016</b>
<b>Job ID :</b>	<b>081-1601402</b>	<b>Submission ID :</b>	<b>081-1601402</b>
<b>Comments :</b>	<b>Submitted Sample</b>		

OCS M/V Ryan T Supply Boat / DCOR, LLC / Main Engines / ID# 16-310 / 8-9-16		
	081-1601402-01-002	Submitted
Method	Test	Result
ASTM D4052	API Gravity @ 60°F	39.0
ASTM D5453	Sulfur Content , ppm (mg/kg) / Wt %	9.7 / 0.0010
ASTM D6304 Proc. A	Water Content , % Mass / ppm (mg/kg)	0.0066 / 66
ASTM D240	Gross Heat of Combustion , Mj/kg	46.065
	Unit Conversion , BTU/lb / BTU/gal	19804 / 136865
ASTM D5291 Method C	Carbon , % Mass	86.3
	Hydrogen , % Mass	13.7
	Nitrogen , % Mass	<0.1
ASTM D5622	Total Oxygen , % Mass	<0.10

For Inspectorate: \_\_\_\_\_

Daniel Javier, Laboratory Manager



## American Research and Testing Inc.

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

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

NUMBER  
207-11-095  
November 14, 2007

SUBJECT: VOC of Chemco 33-S

### REFERENCE:

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

### SAMPLE DESCRIPTION:

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

### REQUEST:

Determine the VOC of the sample.

### METHOD:

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

### RESULTS:

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

SIGNED FOR THE COMPANY

by

*B. Belmont*

B. Belmont  
Senior Chemist

*Rita R. Boggs, Ph.D.*

Rita R. Boggs, Ph.D.  
President

CHEMCO PRODUCTS COMPANY  
6401 E. Alondra Blvd.

Supporting Documentation Rule 74.6

Paramount, CA 90723  
Emergency Phone No. 1-800-255-3924

**MATERIAL SAFETY DATA SHEET**

**SECTION I. IDENTIFICATION OF PRODUCT**

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

**SECTION II. HAZARDOUS INGREDIENTS/IDENTITY INFORMATION**

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

**SECTION III. PHYSICAL/CHEMICAL CHARACTERISTICS**

Boiling Point: >212° F	Specific Gravity: 1.068 ± 0.005	Vapor Pressure (mm Hg.): ND	Melting Point: ND
Vapor Density (Air = 1): ND	Evaporation (H <sub>2</sub> O = 1): ND	Water Solubility: Complete	pH @ 77° F: 13.0 ± 0.5
Appearance and Odor: Clear yellow-green liquid, cucumber odor			VOCgm/L: 44 Diluted with H <sub>2</sub> O 1:1 Resulting VOC gm/L: 22

**SECTION IV. FIRE AND EXPLOSION HAZARD DATA**

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

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

Unusual Fire and Explosion: None known

**SECTION V. HEALTH HAZARD DATA**

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

**(Acute) Health Hazards:**

Eyes: May cause irritation, redness and pain  
Skin: Causes skin irritation. Prolonged/repeated contact may cause itching and local redness.  
Ingestion: May cause headache, nausea, vomiting and abdominal distress  
Inhalation: May cause irritation of upper respiratory tract

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

**Signs and Symptoms of Exposure:**

Eyes: Redness, irritation and blurry vision  
Skin: May cause irritant reaction on prolonged contact  
Ingestion: Abdominal discomfort, nausea, vomiting and diarrhea  
Inhalation: Occasional mild irritation effects to nose and throat may occur  
**Medical Conditions Generally Aggravated by Exposure:** Pre-existing contact site disorders of the skin, liver and kidney  
Excessive exposure may cause hemolysis

**Emergency First Aid Procedures:**

Eyes: Immediately flush eyes with large amounts of water for about 15 minutes. Hold eyelids apart during the flushing to ensure thorough rinsing. Get medical attention.  
Skin: Immediately flush all affected areas with large amount of running water for at least 15 minutes. Remove and discard contaminated clothing and shoes. Get medical attention.  
Ingestion: Do not induce vomiting. If conscious, give large quantity of water. Do not give anything by mouth to an unconscious person. Obtain medical attention.  
Inhalation: Remove to fresh air. If irritation persists, obtain medical attention.

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Carcinogenicity: NTP? No

**SECTION VI. TOXICITY DATA**  
IARC No

OSHA REGULATED? No

Stability: Stable

**SECTION VII. REACTIVITY DATA**

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









