



February 14, 2018

RECEIVED
VENTURA COUNTY
2018 FEB 15 PM 10:56
FCC, D.

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

RE: Annual Compliance Report - Platform Gail, Part 70 Permit No. 1494

Dear Mr. Searcy:

Pursuant to the Part 70 Permit No. 1494 requirement for annual compliance reporting, please find the following information for the twelve-month period of January 2017 through December 2017:

- Completed Permit Attachment Forms for each applicable requirement or Part 70 permit condition.
- Completed Source Test Summary Forms for emission units that require compliance with a quantifiable emission rates (Stationary Gas Turbines G-01, G-02, G-03, and South Crane).
- Additional supporting information to demonstrate compliance with specific permit conditions.

If you have any questions or comments regarding this Annual Compliance Report or need additional information, please call me at 805-745-2100.

Sincerely;

A handwritten signature in blue ink that reads "Pat Moran".

Pat Moran
Sr. Land Negotiator

Enclosure

C: Gerardo Rios, EPA Region IX



Ventura County
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**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: <i>Pat Moran</i> Title: Pat Moran, Sr. Land Negotiator	Date: February 14, 2018
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Time Period Covered by Compliance Certification

01 / 01 / 2017 (MM/DD/YY) to 12 / 31 / 2017 (MM/DD/YY)



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 2017 (MM/DD/YY) to 12 / 31 / 2017 (MM/DD/YY)

A. Attachment # or Permit Condition #: <u>71.1N1</u>	D. Frequency of monitoring:
B. Description: Tanks that are equipped with vapor recovery.	Periodic
C. Method of monitoring: Fugitive I&M Program under Rule 74.10 for the tank hatches and other inlet and outlet gas and liquid piping connections; storage tank vapor recovery system for each applicable tank is monitored on a quarterly basis which includes inspection of the gas compressor, hatches, relief valves, pressure regulators, and flare; dated records of the quarterly inspections and tank maintenance activities are maintained at the facility; verbal notice of maintenance activities; Annual compliance certification verifying tanks are equipped with vapor recovery	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
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 #: <u>71.1N6</u>	D. Frequency of monitoring:
B. Description: Portable tank requirements - tanks must be equipped with both a closed cover that is impermeable to ROC vapors and a pressure-vacuum valve set by the mfr or according to the mfr.'s recommendations.	Periodic
C. Method of monitoring: Fugitive I&M Program for the tank hatches and other inlet and outlet gas and liquid piping connections; annual compliance certification including verification of the integrity of the roof and pressure-vacuum relief valve.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
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 #: <u>71.5N1</u>	D. Frequency of monitoring:
B. Description: Glycol dehydrators – closed pipe control system to fuel gas or sales gas system. Requirement to control the ROC emissions from the regenerator vent by a condenser/vapor disposal system that collects and condenses ROC emissions and directs all uncondensed ROC emissions to a vapor recovery/disposal system.	Periodic
E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable	

<p>C. Method of monitoring:</p> <p>Fugitive I&M Program under Rule 74.10 for the inlet and outlet gas and liquid piping connections; records maintained on site which include facility name, APCD permit no., location and size of glycol reboiler, amount of gas dehydrated, and type of glycol used, description of any installed ROC control system, flow diagram of the dehydrator and any ROC controls, and maintenance records of the ROC control system; Annual compliance certification including a visual inspection assuring that the glycol dehydrator emission control system is a closed system, that the tank storing the condensed hydrocarbon liquid is a closed tank, and that the glycol unit is leak-free.</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>
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Period Covered by Compliance Certification: 01 / 01 / 2017 (MM/DD/YY) to 12 / 31 / 2017 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.9N8	D. Frequency of monitoring: Periodic
B. Description: Stationary diesel-fired internal combustion engines with permitted capacity factor of 15% or less.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Records containing data for each engine verifying the manufacturer's specified maximum hourly fuel consumption, data specifying the actual annual usage (e.g., fuel consumption or operating hours), and data for each engine including the engine manufacturer, model no., operator identification no., and location of each engine. A report of the engine's hours of operation is submitted to the District every 6 months. A report of the engine's hours of operation is attached.	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 #: 74.9N9	D. Frequency of monitoring: Periodic
B. Description: Stationary diesel-fired internal combustion engines used to power cranes and welding equipment	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Records containing data for each engine including the function (usage) of the engine, manufacturer, model number, operator identification number, and location of each engine. Routine surveillance of the diesel-fired engine to ensure that compliance is being maintained.	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 #: 74.9N7	D. Frequency of monitoring: Periodic
B. Description: Emergency Standby Stationary Internal Combustion Engines Operated During Either an Emergency or Maintenance Operation	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Records of operating hours. Date, time, duration, and reason for emergency operation. Records of engine data. Compliance is determined by logged hours of annual operation to ensure less than 50 hours per year.	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



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A. Attachment # or Permit Condition #: 73.23N2/1494	D. Frequency of monitoring:
B. Description: Stationary gas turbines – NOx emissions limits (water-to-fuel ratios) for three 3.4 MW Alison 501-K turbines, except at loads of 1000kW or less, and during thermal stabilization period associated with a start-up, planned shutdown, or unplanned load change.	Continuous, Annually
C. Method of monitoring: Annual source tests of the turbines conducted at 30, 50, 75, and 100 % loads using the following methods: EPA Method 20 for NOx, ARB Method 100 for oxygen content, ASTM Method D 240-87 for fuel oil heating value, ASTM Method 1826-88 for gaseous fuel heating value. Records of the following on a continuous basis: water-to-fuel ratio, type and amount of fuel consumed at all loads and at loads less than 1000 kW, elapsed time of operation, and turbine selection inlet temperature. Observation per shift of ratios to check for any excursion outside the acceptable ratio. Report submitted every 6 months containing actual annual fuel consumption of each turbine at all loads and at loads less than 1000 kW. Report containing fuel consumption is attached.	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> *If yes, attach Deviation Summary Form
A. Attachment # or Permit Condition #: NSPS GG	D. Frequency of monitoring:
B. Description: Standards of performance, NOx limits, and SO2 limits, limits of sulfur content of fuel, continuous monitoring requirements for stationary gas turbines.	Continuous
C. Method of monitoring: Continuous monitoring system that records fuel consumption and the ratio of water-to-fuel accurate within $\pm 5.0\%$. Reports of excess emissions every one-hour period which the ratio's below the required ratio, records of all CEM measurements/information, and performance tests, records of occurrence and duration of any startup, shutdown, or malfunction in operation of an affected facility or air pollution control equipment, any periods during which a continuous monitoring system is inoperative. Records of sulfur content of liquid fuels using ASTM D 2880-71 for each fuel transfer to the storage tank from any other source. Note that Fuel supplier's certifications containing fuel sulfur content by weight for each fuel delivery are maintained and are also referenced to the TVPF46 Compliance Certification Permit Form – Attach. 64.B.2. Records of sulfur content of gaseous fuels every 6 months using ASTM D-3588-91, which is the equivalent of ASTM D 4084-82.	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



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Period Covered by Compliance Certification: 01 / 01 / 2017 (MM/DD/YY) to 12 / 31 / 2017 (MM/DD/YY)

A. Attachment # or Permit Condition #: PO1494PC1 Condition No. 1	D. Frequency of monitoring:
B. Description: Platform Gail Additional Requirements – 12-month rolling records of throughput and consumption as provided in the Permitted Throughput and Consumption Limits Table in Section No. 3 of the Permit.	Periodic
C. Method of monitoring: Monthly records of fuel consumption for the flares, turbines (at all loads and at loads < 1000 kW), back-up generator, starter engines, cranes, boom boat, and crew and supply boats are maintained in 12-month rolling records. Monthly emission for the crew and work boats, and wipe cleaning solvents are calculated and are maintained in 12-month rolling records. Annual compliance certification that these records are maintained.	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



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A. Attachment # or Permit Condition #: PO1494PC1 Condition No. 2	D. Frequency of monitoring: Periodic
B. Description: Platform Gail Additional Requirements - Maximum number of oil wells (30).	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Authority to Construct will be obtained prior to drilling any wells, unless the activity is a redrill. Annual compliance certification that there was no increase in the maximum number of wells. Permit was revised to account for a maximum of 30 wells.	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 #: PO1494PC1 Condition No. 3	D. Frequency of monitoring: Periodic
B. Description: Platform Gail Additional Requirements - BACT requirements for well operations.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual compliance certification that Wells E-9 Short, E-11 Short, E-11 Long, E-12 Short, E-12 Long, E-22 Short, E-22 Long, are free-flowing or operated with electric motor-driven artificial equipment. Compliance with this requirement is determined monthly and written documentation is reported to the MMS. Note: E-9 Long and E-21 are not currently producing and have been converted to water injection wells.	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 #: PO1494PC1 Condition No. 4	D. Frequency of monitoring: Periodic
B. Description: Platform Gail Additional Requirements - Maximum sulfur content of diesel fuel consumed in the crane engines, turbines, turbine starter engines, backup generator engine, and the boats.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Records of certifications from the fuel supplier documenting the sulfur content of each diesel fuel delivery are maintained.	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



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A. Attachment # or Permit Condition #: PO1494PCI Condition No. 5	D. Frequency of monitoring: Periodic
B. Description: Platform Gail Additional Requirements - Crew boat and work boat emission limits	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Monthly records of fuel consumption from the crew and work boats are maintained. Monthly emissions are calculated for the crew and work boats and are maintained in 12-month rolling records. Annual compliance certification that these records are maintained.	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 #: PO1494PCI Condition No. 6 and 7	D. Frequency of monitoring: Periodic
B. Description: Platform Gail Additional Requirements - Crew boat and work boat permitted engines	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Only one crew boat and one work boat was used at any given time. Records are maintained showing the days and hours that each crew boat and work boat was in service. Annual compliance certification that these records are maintained.	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 #: PO1494PCI Condition No. 8	D. Frequency of monitoring: Periodic
B. Description: Platform Gail Additional Requirements - Solvent Recordkeeping	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Records of solvent purchase and usage, along with records of solvent that is recycled or disposed of are maintained for solvents used in solvent cleaning activities, including wipe cleaning. Annual compliance certification that these records are maintained. All cleaning solvents used have a ROC content of 25 g/l or less.	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



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Period Covered by Compliance Certification: 01 / 01 / 2017 (MM/DD/YY) to 12 / 31 / 2017 (MM/DD/YY)

A. Attachment # or Permit Condition #: PO1494PC2 Conditions 1&4	D. Frequency of monitoring:
B. Description: Flare fuel consumption	Continuous
C. Method of monitoring: Each flare has individual fuel meter installed to record the amount of natural gas consumed. Monthly records of volume of gas combusted in flare are maintained in 12-month rolling records. Records also differentiate between emergency (unplanned) usage and non-emergency (planned) usage. Annual compliance certification that these records are maintained.	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 #: PO1494PC2 Conditions 2&3	D. Frequency of monitoring:
B. Description: Flare ignition system operation – each flare is equipped and maintained with a continuous pilot or autoignition system to ensure combustion disposal of all excess produced or recovered gases.	Periodic
C. Method of monitoring: Flare's ignition system is tested monthly and monthly records of the flare's ignition system tests and maintenance activities are maintained. Annual compliance certification that these records are maintained.	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 #: PO1494PC3	D. Frequency of monitoring:
B. Description: Drain pit operation exemption from Rule 71.4 requirements since its function is to act as a containment berm.	Periodic
C. Method of monitoring: Annual compliance certification that the 7.07 square foot deck drain pit (T-21) acts as a containment berm.	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



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A. Attachment # or Permit Condition #: <u>PO1494PC4</u>	D. Frequency of monitoring: <u>Periodic</u>
B. Description: Detroit diesel backup generator operation requirement to not fire this engine simultaneously with any one of the three turbines, except during startup or shutdown transition periods not to exceed one hour, or to perform routine maintenance on the Detroit backup engine.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual compliance certification that the diesel-fired backup generator was not fired simultaneously with any of the three turbines, except during startup or shutdown transition periods which did not exceed one hour, or during routine maintenance on the Detroit diesel backup engine.	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 #: <u>50</u>	D. Frequency of monitoring: <u>Periodic</u>
B. Description: Opacity requirements	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Routine surveillance and visual inspections are performed to ensure that opacity requirements are being maintained. Records including date, time, and identity of emissions unit of any occurrences of visible emissions not meeting Rule 50 opacity requirements are maintained. District notification within subsequent 24 hours if visible emissions problem cannot be corrected within first 24 hours. Annual certification including an annual formal survey identifying the date, time, emissions unit, and verification that there were no visible emissions not meeting the Rule 50 opacity requirements is attached.	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 #: <u>52</u>	D. Frequency of monitoring: <u>Periodic</u>
B. Description: Particulate Matter – Concentration requirements (grain loading)	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual compliance certification that particulate matter was not discharged into the atmosphere from any source at the facility in excess of the concentration listed in the table shown in Rule 52. This is based on a reference to the District analysis of Rule 52 compliance based on EPA emission factors as being sufficient. Periodic monitoring is not necessary to certify compliance.	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



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Period Covered by Compliance Certification: 01 / 01 / 2017 (MM/DD/YY) to 12 / 31 / 2017 (MM/DD/YY)

A. Attachment # or Permit Condition #: 54.B.1 (OCS)	D. Frequency of monitoring:
B. Description: Sulfur Compounds – Sulfur emission concentration requirements at point of discharge	Periodic
C. Method of monitoring: Records of each flaring event are maintained. Unplanned flaring event reports are provided to the District within one week if they exceed 1 hour. The District is notified 72 hours prior to planned flaring. Records of planned flaring is maintained and includes the date, time, duration, flare volume, and estimated sulfur emissions during the entire event. An annual written report of excess emissions was previously submitted to the District on 01/15/14. A representative fuel analysis is being maintained.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
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 #: 54.B.2 (OCS)	D. Frequency of monitoring:
B. Description: Sulfur Compounds – Sulfur emission concentration requirements at ground level	Periodic
C. Method of monitoring: Records of each flaring event are maintained. Unplanned flaring event reports are provided to the District within one week if they exceed 1 hour. The District is notified 72 hours prior to planned flaring. Records of planned flaring is maintained and includes the date, time, duration, flare volume, and estimated sulfur emissions during the entire event. A representative fuel analysis is being maintained.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
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 #: 57.B	D. Frequency of monitoring:
B. Description: Combustion contaminants requirements – Specific – Fuel burning equipment	None
C. Method of monitoring: Annual compliance certification that combustion contaminants were not discharged into the atmosphere from any fuel-burning equipment at the facility in excess of the concentration at the point of discharge, 0.1 grain per cubic foot of gas calculated to 12% CO ₂ at standard conditions. This is based on a reference to the District analysis of Rule 57.B compliance based on EPA emission factors and a representative source test as being sufficient. Periodic monitoring is not necessary to certify compliance.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
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	



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Period Covered by Compliance Certification: 01 / 01 / 2017 (MM/DD/YY) to 12 / 31 / 2017 (MM/DD/YY)

A. Attachment # or Permit Condition #: 64.B.1	D. Frequency of monitoring: Annually
B. Description: Gaseous fuel sulfur compounds concentration requirements for all combustion emissions units at this facility combusting gaseous fuel.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual fuel analysis of the sulfur content of the fuel using South Coast AQMD Method 307-91.	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 #: 64.B.2	D. Frequency of monitoring: Periodic
B. Description: Solid or liquid fuel sulfur compounds concentration requirements for all combustion emissions units at this facility combusting solid or liquid fuel.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Fuel supplier's certifications containing fuel sulfur content by weight for each fuel delivery are maintained.	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 #: 68	D. Frequency of monitoring: None
B. Description: Carbon Monoxide concentration requirements for external combustion equipment	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual compliance certification that carbon monoxide (CO) was not discharged into the atmosphere from any natural gas-fired or fuel oil-fired external combustion equipment at the facility in excess of 2000 ppmv measured on a dry basis at standard conditions. This is based on a reference to the District analysis of Rule 68 compliance based on EPA emission factors as being sufficient. Periodic monitoring is not necessary to certify compliance.	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



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A. Attachment # or Permit Condition #: <u>71.1.C</u>	D. Frequency of monitoring: Periodic
B. Description: Emissions of produced gas must be controlled at all times using a gas collection system that directs all gas to a fuel or sales gas system, or to a flare that combusts ROCs.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Fugitive I&M Program under Rule 74.10 for the gas collection system's gas and liquid piping connections: Annual compliance certification that the produced gas collection system is a closed system through a visual inspection. Flare is inspected on a quarterly basis. Records of visual and flare inspections are maintained at the facility.	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 #: <u>71.4.B.3</u>	D. Frequency of monitoring: None
B. Description: Well cellar storage prohibition	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual certification including routine surveillance and visual inspections that no crude oil or petroleum material was stored in a well cellar except during periods of equipment maintenance or well workover, and in no case, no storage for more than 5 days. No well cellars are on Platform Gail.	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 #: <u>71.4.B.1</u>	D. Frequency of monitoring: None
B. Description: First stage sump prohibition	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual certification that there are no first stage production sums at the facility.	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



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A. Attachment # or Permit Condition #: 74.6	D. Frequency of monitoring:
B. Description: Surface cleaning and degreasing requirements including ROC content limits, application and storage requirements	Periodic
C. Method of monitoring: Records of current material list of ROC-containing material used in solvent cleaning activities are maintained. Routine surveillance of the applicable solvent cleaning activities is also performed. All cleaning solvents used have a ROC content of 25 g/l or less.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
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 #: 74.10	D. Frequency of monitoring:
B. Description: Fugitive leak and leak inspection requirements for components at crude oil production and processing facilities.	Periodic
C. Method of monitoring: Weekly visual inspections of pumps, including but not limited to rod pumps and compressor pumps for liquid leaks. Quarterly monitoring of the following components for gaseous leaks using EPA Reference Method 21: valves, packing seals on dump lever arms connected to gas traps, separators, or vessels, hatches on non-vapor recovery tanks, and polished rod stuffing boxes. All other components not exempt are monitored annually. Routine surveillance of the applicable components is also performed and includes verification of proper operation and equipment and inspection requirements are met. Detected leaks are visibly tagged with the date leak is detected, and repaired no later than 21 days (critical components are at next scheduled shutdown, but no later than 3 months). Repair is reinspected within one week of repair. Updated Operator Management Plan was submitted to the District in May of 1999, and the recertification letter was submitted in January 2014. Records of the following are maintained: location, type, description of each leaking component inspected, and name of any operating unit where each leaking component is found; date of leak detection and method of detection; date that leak is repaired and date of re-check; identification of leaks from critical process units; number of components inspected, number and percentage of leaking components found, categorized by groups: hatches, polished rod stuffing boxes, dumplever arms, valves (not open-ended), open-ended lines, flanges (if designated as exempt), other components.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
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



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A. Attachment # or Permit Condition #: <u>74.22</u>	D. Frequency of monitoring: <u>None</u>
B. Description: Natural gas-fired, fan-type central furnaces – NO _x limits and certification requirements	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual certification including a formal survey identifying each furnace, whether it was installed before or after May 31, 1994, and for those installed after May 31, 1994, information indicating that the certification is contained on the furnace nameplate, or that the furnace is included on a District-provided list of certified furnaces. Platform Gail does not have any natural gas-fired, fan-type central furnaces.	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



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A. Attachment # or Permit Condition #: 74.11.1	D. Frequency of monitoring:
B. Description: Large Water Heaters and Small Boilers	None
C. Method of monitoring: Annual certification including a formal survey identifying each large water heater or small boiler, whether it was installed before or after December 31, 1999, or December 31, 2000 and for those installed after December 31, 1999, or December 31, 2000, information indicating that the certification is contained on the unit's nameplate, or that the unit is included on a District-provided list of certified water heaters, boilers, steam generators and process heaters. Platform Gail does not have any of the applicable units.	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 #: 74.1	D. Frequency of monitoring:
B. Description: Abrasive blasting requirements	Periodic
C. Method of monitoring: Routine surveillance including assuring that operation and equipment requirements are being met, and visual inspections to ensure there are no opacity violations of each abrasive blasting operation are performed. Records including date of operation, type of abrasive blasting media used, identity, size, and location of item blasted, whether the operation was conducted inside or outside a permanent building, and CARB certifications for the abrasives used are maintained.	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



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A. Attachment # or Permit Condition #: <u>74.2</u>	D. Frequency of monitoring: <u>Periodic</u>
B. Description: Architectural coating requirements	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Routine surveillance and records including specifying the usage of compliant coatings and maintaining VOC records of coatings used (MSDSs are maintained). VOC content of coatings are measured using EPA Method 24. VOC content of exempt organic compounds are measured using CARB Method 432, and acid content of pretreatment wash primers are measured using ASTM Method D 1613-85, and metal content of metallic pigmented coatings are measured using SCAQMD Method 311-91.	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



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Period Covered by Compliance Certification: 01 / 01 / 2017 (MM/DD/YY) to 12 / 31 / 2017 (MM/DD/YY)

A. Attachment # or Permit Condition #: <u>74.16N1494</u>	D. Frequency of monitoring: Periodic
B. Description: Oilfield Drilling Operations	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual compliance certification that the turbines are used to supply electrical power during drilling operations.	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 #: <u>40CFR61.M</u>	D. Frequency of monitoring: Periodic
B. Description: National emission standard for asbestos	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual compliance certification that compliance with 40 CFR 61 Subpart M is met if an asbestos demolition or renovation activity occurs.	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 #: <u>ATCM ENG.N3</u>	D. Frequency of monitoring: Periodic
B. Description: Stationary compression ignition engines used solely on OCS platforms	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual certification that monthly fuel consumption records, hours of operation, and fuel type records are maintained. ATCM emission standards are not federally enforceable.	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



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Period Covered by Compliance Certification: 01 / 01 / 2017 (MM/DD/YY) to 12 / 31 / 2017 (MM/DD/YY)

A. Attachment # or Permit Condition #: 40CFR63ZZZZ3	D. Frequency of monitoring:
B. Description: RICE MACT for emergency diesel engines – oil change and inspections	Periodic
C. Method of monitoring: Annual compliance certification that maintenance records are maintained and engines are equipped with non-resettable hour meters.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
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 #: 40CFR63ZZZZ4	D. Frequency of monitoring:
B. Description: RICE MACT for non-emergency diesel engines less than or equal to 300 HP – oil change and inspections	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual compliance certification that maintenance records are maintained.	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 #: 40CFR63ZZZZ6	D. Frequency of monitoring:
B. Description: RICE MACT for non-emergency diesel engines greater than 500 HP – CO ppm limit	Periodic
C. Method of monitoring: Annual certification that the South Crane CO source testing will be conducted every 8760 hours of operation or every three years, whichever comes first. Catalyst temperatures are monitored using a CPMS. Initial source testing conducted in March 2014.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
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	



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ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 17 (MM/DD/YY) to 12 / 31 / 17 (MM/DD/YY)

A. Attachment # or Permit Condition #: Attachment No. 74.23N2/1494	B. Equipment description: Contaminants in G-03 SCR ammonia flow line. Breakdown and Excess Emissions Reported.	C. Deviation Period: Date & Time Begin: 03-02-17/1300 End: 03-03-17/1100 When Discovered: Date & Time 03-02-17/1300
D. Parameters monitored: NH3 Injection Rate	E. Limit: 1.3 gpm	F. Actual: 0 gpm
G. Probable Cause of Deviation: Contaminants in flow line	H. Corrective actions taken: Installed filters further upstream in process Breakdown coverage obtained	

A. Attachment # or Permit Condition #: Attachment No. 74.23N2/1494	B. Equipment description: Lost seal on G-03 water pump, resulting in insufficient water injection rates.	C. Deviation Period: Date & Time Begin: 05-10-17/2045 End: 05-10-17/2357 When Discovered: Date & Time 05-10-17/2045
D. Parameters monitored: Water Injection Rate	E. Limit: 0.44lb. water/lb. fuel	F. Actual: 0.00 lb. water/lb. fuel
G. Probable Cause of Deviation: Lost seal on water pump	H. Corrective actions taken: Replaced water pump Breakdown coverage obtained	

A. Attachment # or Permit Condition #: Attachment No. 74.23N2/1494	B. Equipment description: Water inj. Shut off due to load swings below 1000Kw.	C. Deviation Period: Date & Time Begin: 9-29-17/1900 End: 9-29-17/2017 When Discovered: Date & Time 9-29-17/11:30
D. Parameters monitored: Water Injection Rate	E. Limit 0.44lb. water/lb. fuel	F. Actual: 0.00 lb. water/lb. fuel
G. Probable Cause of Deviation: Water inj. Shut off due to load swings below 1000Kw.	H. Corrective actions taken: Increase load Breakdown coverage obtained	



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Period Covered by Compliance Certification: 01 / 01 / 17 (MM/DD/YY) to 12 / 31 / 17 (MM/DD/YY)

A. Attachment # or Permit Condition #: Permit Throughput Table 3	B. Equipment description: Exceeded Allison turbines <1000 KW annual natural gas throughput limit	C. Deviation Period: Date & Time Begin: 12-01-17/0000 End: 12-31-17/2359 When Discovered: Date & Time 02-12-18
D. Parameters monitored: Annual turbines gas consumption at loads less than 1000 KW	E. Limit: 9.0 MMCF/Yr	F. Actual: 22.13 MMCF/Yr
G. Probable Cause of Deviation: Reduced power consumption due to permanent facility shutdown	H. Corrective actions taken: Pending permit modification	



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Period Covered by Compliance Certification: 01/01/17 (MM/DD/YY) to 12/31/17 (MM/DD/YY)

A. Emission Unit Description: Turbine G-01 @ 30% Load (Gas)		B. Pollutant: NO _x
C. Measured Emission Rate: 2.0 ppmv @ 15% O ₂	D. Limited Emission Rate: 5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-01 @ 30% Load (Gas)		B. Pollutant: NH ₃
C. Measured Emission Rate: 14.2 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-01 @ 30% Load (Diesel)		B. Pollutant: NO _x
C. Measured Emission Rate: 4.2 ppmv @ 15% O ₂	D. Limited Emission Rate: 13 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-01 @ 30% Load (Diesel)		B. Pollutant: NH ₃
C. Measured Emission Rate: 6.5 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description:		B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:



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Period Covered by Compliance Certification: 01/01/17 (MM/DD/YY) to 12/31/17 (MM/DD/YY)

A. Emission Unit Description: Turbine G-01 @ 50% Load (Gas)		B. Pollutant: NO _x
C. Measured Emission Rate: 0.7 ppmv @ 15% O ₂	D. Limited Emission Rate: 2.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-01 @ 50% Load (Gas)		B. Pollutant: NH ₃
C. Measured Emission Rate: 10.7 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-01 @ 50% Load (Diesel)		B. Pollutant: NO _x
C. Measured Emission Rate: 1.8 ppmv @ 15% O ₂	D. Limited Emission Rate: 6.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-01 @ 50% Load (Diesel)		B. Pollutant: NH ₃
C. Measured Emission Rate: 5.0 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description:		B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:



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A. Emission Unit Description: Turbine G-01 @ 75% Load (Gas)		B. Pollutant: NO _x
C. Measured Emission Rate: 0.7 ppmv @ 15% O ₂	D. Limited Emission Rate: 2.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-01 @ 75% Load (Gas)		B. Pollutant: NH ₃
C. Measured Emission Rate: 4.5 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-01 @ 75% Load (Diesel)		B. Pollutant: NO _x
C. Measured Emission Rate: 5.0 ppmv @ 15% O ₂	D. Limited Emission Rate: 6.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-01 @ 75% Load (Diesel)		B. Pollutant: NH ₃
C. Measured Emission Rate: 2.8 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description:		B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:



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A. Emission Unit Description: Turbine G-01 @ 100% Load (Gas)		B. Pollutant: NO _x
C. Measured Emission Rate: 1.4 ppmv @ 15% O ₂	D. Limited Emission Rate: 2.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-01 @ 100% Load (Gas)		B. Pollutant: NH ₃
C. Measured Emission Rate: 3.1 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-01 @ 100% Load (Diesel)		B. Pollutant: NO _x
C. Measured Emission Rate: 5.3 ppmv @ 15% O ₂	D. Limited Emission Rate: 6.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-01 @ 100% Load (Diesel)		B. Pollutant: NH ₃
C. Measured Emission Rate: 5.6 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description:		B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:



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A. Emission Unit Description: Turbine G-02 @ 30% Load (Gas)		B. Pollutant: NO _x
C. Measured Emission Rate: 2.5 ppmv @ 15% O ₂	D. Limited Emission Rate: 5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012
F. Test Date: February 14-16, 2017		
A. Emission Unit Description: Turbine G-02 @ 30% Load (Gas)		B. Pollutant: NH ₃
C. Measured Emission Rate: 8.6 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012
F. Test Date: February 14-16, 2017		
A. Emission Unit Description: Turbine G-02 @ 30% Load (Diesel)		B. Pollutant: NO _x
C. Measured Emission Rate: 4.3 ppmv @ 15% O ₂	D. Limited Emission Rate: 13 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012
F. Test Date: February 14-16, 2017		
A. Emission Unit Description: Turbine G-02 @ 30% Load (Diesel)		B. Pollutant: NH ₃
C. Measured Emission Rate: 7.5 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012
F. Test Date: February 14-16, 2017		
A. Emission Unit Description:		B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:
		F. Test Date:



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A. Emission Unit Description: Turbine G-02 @ 50% Load (Gas)		B. Pollutant: NO _x
C. Measured Emission Rate: 0.9 ppmv @ 15% O ₂	D. Limited Emission Rate: 2.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-02 @ 50% Load (Gas)		B. Pollutant: NH ₃
C. Measured Emission Rate: 5.9 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-02 @ 50% Load (Diesel)		B. Pollutant: NO _x
C. Measured Emission Rate: 2.3 ppmv @ 15% O ₂	D. Limited Emission Rate: 6.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-02 @ 50% Load (Diesel)		B. Pollutant: NH ₃
C. Measured Emission Rate: 5.8 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description:		B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:



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A. Emission Unit Description: Turbine G-02 @ 75% Load (Gas)		B. Pollutant: NO _x
C. Measured Emission Rate: 1.2 ppmv @ 15% O ₂	D. Limited Emission Rate: 2.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-02 @ 75% Load (Gas)		B. Pollutant: NH ₃
C. Measured Emission Rate: 6.0. ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-02 @ 75% Load (Diesel)		B. Pollutant: NO _x
C. Measured Emission Rate: 4.6 ppmv @ 15% O ₂	D. Limited Emission Rate: 6.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-02 @ 75% Load (Diesel)		B. Pollutant: NH ₃
C. Measured Emission Rate: 5.1 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description:		B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:



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A. Emission Unit Description: Turbine G-02 @ 100% Load (Gas)		B. Pollutant: NO _x
C. Measured Emission Rate: 1.8 ppmv @ 15% O ₂	D. Limited Emission Rate: 2.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-02 @ 100% Load (Gas)		B. Pollutant: NH ₃
C. Measured Emission Rate: 4.7 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-02 @ 100% Load (Diesel)		B. Pollutant: NO _x
C. Measured Emission Rate: 4.3 ppmv @ 15% O ₂	D. Limited Emission Rate: 6.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-02 @ 100% Load (Diesel)		B. Pollutant: NH ₃
C. Measured Emission Rate: 4.7 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description:		B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:



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ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01/01/17 (MM/DD/YY) to 12/31/17 (MM/DD/YY)

A. Emission Unit Description: Turbine G-03 @ 30% Load (Gas)		B. Pollutant: NO _x
C. Measured Emission Rate: 2.2 ppmv @ 15% O ₂	D. Limited Emission Rate: 5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-03 @ 30% Load (Gas)		B. Pollutant: NH ₃
C. Measured Emission Rate: 6.2 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-03 @ 30% Load (Diesel)		B. Pollutant: NO _x
C. Measured Emission Rate: 4.4 ppmv @ 15% O ₂	D. Limited Emission Rate: 13 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-03 @ 30% Load (Diesel)		B. Pollutant: NH ₃
C. Measured Emission Rate: 8.3 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description:		B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:



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Period Covered by Compliance Certification: 01/01/17 (MM/DD/YY) to 12/31/17 (MM/DD/YY)

A. Emission Unit Description: Turbine G-03 @ 50% Load (Gas)		B. Pollutant: NO _x
C. Measured Emission Rate: 0.8 ppmv @ 15% O ₂	D. Limited Emission Rate: 2.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-03 @ 50% Load (Gas)		B. Pollutant: NH ₃
C. Measured Emission Rate: 6.0 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-03 @ 50% Load (Diesel)		B. Pollutant: NO _x
C. Measured Emission Rate: 1.7 ppmv @ 15% O ₂	D. Limited Emission Rate: 6.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-03 @ 50% Load (Diesel)		B. Pollutant: NH ₃
C. Measured Emission Rate: 6.5 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description:		B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:



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ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01/01/17 (MM/DD/YY) to 12/31/17 (MM/DD/YY)

A. Emission Unit Description: Turbine G-03 @ 75% Load (Gas)		B. Pollutant: NO _x
C. Measured Emission Rate: 2.0 ppmv @ 15% O ₂	D. Limited Emission Rate: 2.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-03 @ 75% Load (Gas)		B. Pollutant: NH ₃
C. Measured Emission Rate: 4.9 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-03 @ 75% Load (Diesel)		B. Pollutant: NO _x
C. Measured Emission Rate: 5.8 ppmv @ 15% O ₂	D. Limited Emission Rate: 6.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-03 @ 75% Load (Diesel)		B. Pollutant: NH ₃
C. Measured Emission Rate: 6.1 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description:		B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:



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ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01/01/17 (MM/DD/YY) to 12/31/17 (MM/DD/YY)

A. Emission Unit Description: Turbine G-03 @ 100% Load (Gas)		B. Pollutant: NO _x
C. Measured Emission Rate: 1.6 ppmv @ 15% O ₂	D. Limited Emission Rate: 2.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-03 @ 100% Load (Gas)		B. Pollutant: NH ₃
C. Measured Emission Rate: 4.7 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-03 @ 100% Load (Diesel)		B. Pollutant: NO _x
C. Measured Emission Rate: 5.2 ppmv @ 15% O ₂	D. Limited Emission Rate: 6.5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description: Turbine G-03 @ 100% Load (Diesel)		B. Pollutant: NH ₃
C. Measured Emission Rate: 5.2 ppmv @ 15% O ₂	D. Limited Emission Rate: 20 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-x Job No. 22012

A. Emission Unit Description:		B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:



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ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 17 (MM/DD/YY) to 12 / 31 / 17 (MM/DD/YY)

A. Emission Unit Description: 545 HP Caterpillar Diesel Engine (South Crane) – 10% of Scale			B. Pollutant: CO
C. Measured Emission Rate: <10 ppmv @ 15% O ₂	D. Limited Emission Rate: 23 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012	F. Test Date: 03/15/2017

A. Emission Unit Description: 545 HP Caterpillar Diesel Engine (South Crane) – Actual			B. Pollutant: CO
C. Measured Emission Rate: 3.9 ppmv @ 15% O ₂	D. Limited Emission Rate: 23 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012	F. Test Date: 03/15/2017

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:



1210 E. 223rd Street, Suite #314 • Carson, California 90745 • 310/830-2226 • Fax 310/830-2227

www.quantumairlab.com

CLIENT Oilfield Environmental Compliance
PROJECT NO: #####
LABORATORY NO: 17-159
SAMPLING DATE: February 20, 2017
RECEIVING DATE: February 21, 2017
ANALYSIS DATE: February 21, 2017
REPORT DATE: February 22, 2017

Laboratory Analysis Report

Analysis Method	SCAQMD 307-91				
Detection Limits	0.05 PPMV				
Analyte	Client ID	Plt. Gail Fuel Gas	Plt. Gail Fuel Gas Duplicate	Plt. Grace Fuel Gas	Plt. Grace Fuel Gas Duplicate
	Sample ID No	1700709-01	1700709-02	1700709-03	1700709-04
	Sampling Date	2/20/17	2/20/17	2/20/17	2/20/17
	Sampling Time	1000	1005	1040	1045
	Lab ID	05217-1	05217-2	05217-3	05217-4
	Units	PPMV	PPMV	PPMV	PPMV
Hydrogen Sulfide	2.43	1.55	12.81	11.77	
Carbonyl Sulfide	2.06	2.07	<0.05	<0.05	
Methyl Mercaptan	0.68	0.61	0.05	0.05	
Ethyl Mercaptan	0.29	0.20	<0.05	<0.05	
Un-Identified S Compounds	2.20	2.03	0.96	0.97	
TRS as H2S	7.66	6.46	13.82	12.79	

TRS: Total Reduced Sulfur as Hydrogen Sulfide

*Sample was diluted for analysis

Dr. Andrew Kitto
President



Letter of Conformance

February 9, 2018

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to Venoco Platform Gail & Grace from 1/1/2017-12/31/2017.

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.

Terri Merritt

A handwritten signature in black ink that reads "Terri Merritt".

Account Manager
SC Fuels
Oxnard Division
Office (805)299-1217
merrittt@scfuels.com

3815 E. VINEYARD AVE, OXNARD, CA 93030 * MAILING ADDRESS: P.O. BOX 50540, OXNARD, CA 93031-0540

