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Ventura, CA 93003  
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VENTURA COUNTY  
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February 11, 2019

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

RE: Annual Compliance Certification Report  
Platform Gilda, PTO 1492

Dear Mr. Searcy:

DCOR, LLC, is submitting the enclosed Annual Compliance Verification report for Platform Gilda as required by Part 70 Permit to Operate 1492. This report covers the time period of January 1, 2018, through December 31, 2018.

Please do not hesitate to contact me at 805-535-2060 with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Claire Wells".

Claire Wells  
Air Compliance Coordinator

Enclosure

C: Mr. Gerardo Rios  
USEPA REGION 9  
75 Hawthorne Street  
Mail Code: AIR-3  
San Francisco, CA 94105



**DCOR, LLC**

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**2018 ANNUAL COMPLIANCE  
CERTIFICATION REPORT**

**PLATFORM GILDA**

**PART 70  
PERMIT TO OPERATE 1492**

**Submitted to:**

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

**Submitted by:**

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

**DCOR, LLC – PLATFORM GILDA – PTO 1492**

**2018**

**COMPLIANCE VERIFICATION REPORT**

**for the time period 1/1/18 – 12/31/18**

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## **SECTION 1**

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### **Compliance Certification**



Ventura County  
Air Pollution  
Control District

**ANNUAL COMPLIANCE CERTIFICATION  
SIGNATURE COVER FORM**

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


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

**Confidentiality**

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

**Certification by Responsible Official**

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

Signature and Title of Responsible Official:  Title: Robert L. Garcia, VP - Facilities & Process Engineering	Date: 2.11.19
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Time Period Covered by Compliance Certification 01 / 01 / 2018 (MM/DD/YY) to 12 / 31 / 2018 (MM/DD/YY)
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## 1.c. PERIODIC MONITORING SUMMARY

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

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

### 1.c.1. Specific Applicable Requirements

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

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

### 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>Daily visual inspection 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	
74.15.1.N1	Rule 74.15.1.B.1	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Biennial Source Test (NO<sub>x</sub>, CO)</li> <li>Annual NO<sub>x</sub> and CO screening</li> </ul>	<ul style="list-style-type: none"> <li>Records of source tests</li> <li>Records of NO<sub>x</sub> and CO screenings</li> <li>Daily records of alternate fuel consumption</li> </ul>	None	<ul style="list-style-type: none"> <li>NO<sub>x</sub>-ARB Method 100</li> <li>CO-ARB Method 100</li> </ul>	
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
40CFR63ZZZNS	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
PO1492PC1 - 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	
PO1492PC1 - 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	
PO 1492PC1 - Condition No. 3	Rule 26 Well Operations - BACT Requirements	<ul style="list-style-type: none"> <li>Annual compliance certification</li> </ul>	None	None	None	
PO1492PC1 - 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>	<ul style="list-style-type: none"> <li>Fuel records</li> </ul>	None	None	
PO1492PC1 - Condition No. 5	Rules 26 and 29 Crew Boat and Work Boat Fuel Use Limits	<ul style="list-style-type: none"> <li>Rolling twelve month diesel fuel consumption for boats servicing Platforms Gina and Gilda</li> <li>75% of usage for both platforms is the Gilda usage</li> <li>Annual compliance certification</li> <li>Information only</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of diesel fuel consumption for both platforms; and 75% of total is for Gilda</li> </ul>	None	None	
PO1492PC1 - Condition No. 6	Boat engine permitted emissions information	<ul style="list-style-type: none"> <li>Information only</li> </ul>	<ul style="list-style-type: none"> <li>Information only</li> </ul>	None	None	
PO1492PC1 - Condition No. 7	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of crew boat operation</li> <li>Maintain a log of boats and engines</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of crew boat operation</li> <li>Maintain a log of crew boats and engines</li> </ul>	None	None	
PO1492PC1 - Condition No. 8	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> <li>Maintain a list of exempt solvents</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> <li>Maintain a list of exempt solvents</li> </ul>	None	None	
PO1492PC1 - 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	
PO1492PC2 - 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	



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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1492PC2 - Condition Nos. 3 and 4	Rules 71.1 Flare Ignition System Operation	<ul style="list-style-type: none"> <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	
PO1492PC3 - Condition Nos. 1, 4, and 5	Rule 74.9 and Section 61.4211(f)(2)(ii) of 40 CFR Part 60, Subpart III	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Monthly records of maintenance and testing hours</li> <li>Monthly records of DRP hours</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of maintenance and testing hours</li> <li>Monthly records of DRP hours</li> </ul>	None	None	
PO1492PC3 - Condition Nos. 2, 4 and 5	Rules 26 and 74.9 50 hours per year and 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	
PO1492PC3 - Condition No. 3	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

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

### 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>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>Monitor each solvent cleaning activity</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</li> <li>active/passive solvent losses-SCAQMD Method (110-3-89)</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>Monitor each 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>Monitor each coating activity and specify compliant coatings</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 (NOx) 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>	

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## **SECTION 2**

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### **Breakdowns, Deviations, and Excess Emissions**

**PTO 1492: PLATFORM GILDA**

Reporting Period: January 1, 2018 through December 31, 2018

There were no Breakdown Reports filed during this reporting period.

There were no Deviation Reports filed during this reporting period.

There were no Notices of Violation issued.

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

## **SECTION 3**

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### **Specific Applicable Requirements**





## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>71.1N1</b></p>	<p>D. Frequency of monitoring: <b>Daily, Quarterly</b></p>
<p>B. Description:  <b>Fugitive Emission Inspection and Maintenance Program (Rule 74.10) Rule 71.1.B.1a. Compliance via vapor recovery</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:  <b>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.</b></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>71.N6</b></p>	<p>D. Frequency of monitoring: <b>Daily, Quarterly</b></p>
<p>B. Description:  <b>Crude Oil Production and Separation, Compliance with Vapor Recovery</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:  <b>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.</b></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>71.4N1</b></p>	<p>D. Frequency of monitoring: <b>Quarterly</b></p>
<p>B. Description:  <b>Petroleum Sumps, Pits, Ponds and Well Cellar Compliance</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:  <b>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.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>74.9N7</b></p>	<p>D. Frequency of monitoring: <b>Daily</b></p>
<p>B. Description:  <b>Stationary Internal Combustion Engines</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:  <b>Emergency standby stationary internal combustion engine only operated during an emergency or during maintenance operation of not more than 50 hours per calendar year.</b></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>74.9N9</b></p>	<p>D. Frequency of monitoring: <b>Daily</b></p>
<p>B. Description:  <b>Stationary Internal Combustion Engines</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:  <b>All crane and welder IC engines are diesel fired. These engines are used to power the cranes and welders only.</b></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>74.15.1N1</b></p>	<p>D. Frequency of monitoring: <b>Daily records of fuel use; Biennial source test; Annual screening analysis.</b></p>
<p>B. Description:  <b>Boilers, Steam Generators, and Process Heaters</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>ARB Method 100 (NOx and CO)</b></p>
<p>C. Method of monitoring:  <b>Biennial emission source testing to ensure that the unflux heater is operating within the normal parameters.</b></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 SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant: NOx
C. Measured Emission Rate: 22 ppm @ 3% O2	D. Limited Emission Rate: 30 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation: Emission Screening Analysis	F. Test Date: 4/24/2018

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant: CO
C. Measured Emission Rate: 380 ppm @ 3% O2	D. Limited Emission Rate: 400 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation: Emission Screening Analysis	F. Test Date: 4/24/2018

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater (Note: The Heater was source tested 1/15/19, report to be submitted)			B. Pollutant: NOx
C. Measured Emission Rate: 20.7 ppm @ 3% O2	D. Limited Emission Rate: 30 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation: ARB Method 100	F. Test Date: 1/31/2017

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater (Note: The Heater was source tested 1/15/19, report to be submitted)			B. Pollutant: CO
C. Measured Emission Rate: 158 ppm @ 3% O2	D. Limited Emission Rate: 400 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation: ARB Method 100	F. Test Date: 1/31/2017

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:



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>ATCM Engine N3</b></p>	<p>D. Frequency of monitoring: <b>Daily, Annually</b></p>
<p>B. Description: <b>Air Toxic Control Measure for Stationary Compression Ignition Engines</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: <b>Use of CARB Diesel; Recordkeeping</b></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>40 CFR 63 ZZZZ N3 (RICE MACT)</b></p>	<p>D. Frequency of monitoring: <b>Daily, Annually</b></p>
<p>B. Description: <b>NESHAP for Stationary RICE, Emergency Engines</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: <b>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.</b></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>40 CFR 63 ZZZZ N5 (RICE MACT)</b></p>	<p>D. Frequency of monitoring: <b>Daily, Annually</b></p>
<p>B. Description: <b>NESHAP for Stationary RICE, Non-Emergency Engines</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: <b>Minimize engine idle time. Comply with applicable emission standards. Use of nonroad diesel. Crankcase ventilation system. Recordkeeping.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

## **SECTION 4**

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### **Permit Specific Conditions**



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 1</p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center; font-weight: bold;">Monthly</p>
<p>B. Description:</p> <p style="text-align: center;">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</p> <p style="text-align: center;">N/A</p>
<p>C. Method of monitoring:</p> <p>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></p> <p><small>*If yes, attach Deviation Summary Form</small></p>

<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 2</p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center; font-weight: bold;">Annual Compliance Certification</p>
<p>B. Description:</p> <p style="text-align: center;">Maximum Number of Oil Wells: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p style="text-align: center;">N/A</p>
<p>C. Method of monitoring:</p> <p>The platform is permitted with the maximum number of wells, this number cannot be exceeded. This platform has 48 slots with oil well completions. Annual Compliance Certification.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></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><small>*If yes, attach Deviation Summary Form</small></p>

<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 3</p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center; font-weight: bold;">Annual Compliance Certification</p>
<p>B. Description:</p> <p style="text-align: center;">Well Operations: BACT Requirements: Rule 26</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p style="text-align: center;">N/A</p>
<p>C. Method of monitoring:</p> <p>Annual Compliance Certification verifying that the wells S-89 (slot 6), S-87 (slot 28) and S-28 (slot 58) are free flowing, have operated on gas lift, or with electric motor driven artificial lift equipment.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></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><small>*If yes, attach Deviation Summary Form</small></p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 4</p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></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></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 5</p>	<p>D. Frequency of monitoring: <b>Daily</b></p>
<p>B. Description:  Crew and Work Boat Emission Limits: Rules 26 and 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  N/A</p>
<p>C. Method of monitoring:  Daily records of diesel fuel consumption and emission calculations using Ventura County APCD approved emission factors. Fuel consumption is determined through either inline non-resettable meter or onboard daily soundings.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 1 Item 6</p>	<p>D. Frequency of monitoring: <b>Daily</b></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></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Condition 1 Item 7</b></p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center; font-weight: bold;">Daily</p>
<p>B. Description:</p> <p style="text-align: center; font-weight: bold;">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</p> <p style="text-align: center; font-weight: bold;">N/A</p>
<p>C. Method of monitoring:</p> <p>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><small>*If yes, attach Deviation Summary Form</small></p>

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center; font-weight: bold;">Monthly</p>
<p>B. Description:</p> <p style="text-align: center; font-weight: bold;">Solvent Recordkeeping: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p style="text-align: center; font-weight: bold;">N/A</p>
<p>C. Method of monitoring:</p> <p>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></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><small>*If yes, attach Deviation Summary Form</small></p>

<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Permit Condition 1 Item 9</b></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><small>*If yes, attach Deviation Summary Form</small></p>





## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Condition 2 Section 1, 2, 5</b></p>	<p>D. Frequency of monitoring: <b>Daily, Monthly</b></p>
<p>B. Description:  <b>Flare Fuel Consumption: Rule 29</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:  <b>Monthly records of fuel consumption and flare activity monitored by individual fuel meters on the flare.</b></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 #:</p>	<p>D. Frequency of monitoring: <b>Monthly</b></p>
<p>B. Description:  <b>Flare Ignition System: Rule 71.1</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:  <b>Flare has continuous pilot fed by sweet gas.</b></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 #:</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): _____  G. Compliance Status? (C or I): _____  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: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 3 Section 1</p>	<p>D. Frequency of monitoring: Monthly, Annually</p>
<p>B. Description:  40 CFR Part 63, Subpart ZZZZ, NESHAPS RICE MACT for Backup Utility Generator</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  N/A</p>
<p>C. Method of monitoring:  Monitoring of all reasons for use (i.e., loss of grid electricity or loss of stationary source's own power production).</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 3 Sections 2 and 3</p>	<p>D. Frequency of monitoring: Monthly, Annually</p>
<p>B. Description:  New Source Review: Rule 26; and, Stationary Internal Combustion Engines: Rule 74.9</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  N/A</p>
<p>C. Method of monitoring: Non-resettable hour meters are installed on the back-up utility generator. Logs are maintained of the daily usage. The engine is operated less than 200 hours per calendar year, operated during an emergency operation, and/or operated less than 50 hours during maintenance and is therefore exempt from Rule 74.9, "Stationary Internal Combustion Engines."</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<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): _____  G. Compliance Status? (C or I): _____  H. *Excursions, exceedances, or other non-compliance? (Y or N): _____  *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: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

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

<p>A. Attachment # or Permit Condition #: <b>Rule 64.B1</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Sulfur Content of Fuels (Gaseous)</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:  <b>Laboratory analysis conducted annually of Non-PUC quality fuel gas; Determination of Sulfur in a gaseous matrix.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u>  G. Compliance Status? (C or I): <u>  C  </u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>  N  </u>  *If yes, attach Deviation Summary Form</p>

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Attachment 71.1.C</b></p>	<p>D. Frequency of monitoring: <b>Daily, Quarterly, Annually</b></p>
<p>B. Description:  <b>Rules 71.1C and 74.10: Crude Oil Production and Separation</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:  Produced gas must be controlled at all times and is verified through the daily visual and periodic maintenance of the produced gas collection system on Platform Gilda. Produced gas is either directed to sales, vapor compressor or flare. Compliance with Rule 74.10 ensures that various components are not leaking. The produced gas stream is a fully controlled closed loop system.</p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u> G. Compliance Status? (C or I): <u>  C  </u> 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 #: <b>Rule 71.4.B1</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Petroleum Sumps, Pits, and Well Cellars - First Stage Sump Prohibition</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:  There are no first stage sumps on Platform Gilda. Offshore platforms are equipped with non-leaking stuffing boxes, oil is never stored in an open "pit" or cellar.</p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u> 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 71.4.B3</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Petroleum Sumps, Pits, and Well Cellars - Well Cellar Storage Prohibition</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:  There are no well cellars on Platform Gilda. Offshore platforms are equipped with non-leaking stuffing boxes, oil is never stored in an open "pit" or cellar.</p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u> G. Compliance Status? (C or I): <u>  C  </u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>  N  </u> *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (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>Fugitive Emissions - Oilfields</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 Gilda has no water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than 75,000 BTU/hr and less than or equal to 1,000,000 BTU/hr.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 74.22</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Natural Gas Fired Fan - Central Furnaces</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:  <b>There are no natural gas fired fan-type furnaces on the platform. Platform Gilda is not subject to this requirement.</b></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 #:</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): _____  G. Compliance Status? (C or I): _____  H. *Excursions, exceedances, or other non-compliance? (Y or N): _____  *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): _____  G. Compliance Status? (C or I): _____  H. *Excursions, exceedances, or other non-compliance? (Y or N): _____  *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: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (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 inspection during abrasive blasting operations. Use of California Certified abrasive sands.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Rule 74.2</b></p>	<p>D. Frequency of monitoring: <b>Monthly Records, Annual Compliance Certification</b></p>
<p>B. Description:  Architectural Coatings</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> 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 74.16</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  Oilfield Drilling Operations</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> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Part 70 General</b></p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;"><b>Annual Compliance Certification</b></p>
<p>B. Description:</p> <p style="text-align: center;"><b>General Part 70 Permit Conditions</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p style="text-align: center;"><b>N/A</b></p>
<p>C. Method of monitoring:</p> <p style="text-align: center;"><b>Compliance with Permit to Operate 1492</b></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><small>*If yes, attach Deviation Summary Form</small></p>

<p>A. Attachment # or Permit Condition #: <b>PO General</b></p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;"><b>Annual Compliance Certification</b></p>
<p>B. Description:</p> <p style="text-align: center;"><b>General Permit to Operate Conditions</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p style="text-align: center;"><b>N/A</b></p>
<p>C. Method of monitoring:</p> <p style="text-align: center;"><b>Compliance with Permit to Operate 1492</b></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><small>*If yes, attach Deviation Summary Form</small></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><small>*If yes, attach Deviation Summary Form</small></p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 18 (MM/DD/YY) to 12 / 31 / 18 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 60, Subpart OOOO</p>	<p>D. Frequency of monitoring:  Annual Compliance Certification</p>
<p>B. Description:  NSPS for Crude Oil and Natural Gas Production, Transmission and Distribution</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  N/A</p>
<p>C. Method of monitoring:  Compliance with Permit to Operate 1492 and VCAPCD Rules</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<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>

<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 7**

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### **Supporting Documentation**

## PLATFORM GILDA DIESEL CRANES FUEL USAGE

GILDA	NORTH CRANE 325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-17	21	146	1528
Feb-17	26	171	1594
Mar-17	12	94	1430
Apr-17	5	54	1438
May-17	10	57	1456
Jun-17	11	65	1453
Jul-17	73	391	1770
Aug-17	144	826	2165
Sep-17	27	165	2281
Oct-17	23	149	2381
Nov-17	9	58	2385
Dec-17	9	70	2245
Jan-18	20	107	2206
Feb-18	1	9	2044
Mar-18	12	70	2020
Apr-18	20	119	2085
May-18	11	64	2093
Jun-18	27	166	2194
Jul-18	11	69	1872
Aug-18	11	67	1113
Sep-18	10	58	1006
Oct-18	21	124	980
Nov-18	84	488	1410
Dec-18	39	226	1566
North Crane permit limits		19,250 gal/yr	

GILDA	SOUTH CRANE 325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-17	109	611	2845
Feb-17	82	500	3191
Mar-17	18	100	2759
Apr-17	14	81	2775
May-17	27	153	2810
Jun-17	19	112	2827
Jul-17	123	685	3420
Aug-17	86	512	3668
Sep-17	87	498	4055
Oct-17	19	125	4095
Nov-17	19	105	4102
Dec-17	20	107	3587
Jan-18	32	177	3153
Feb-18	25	143	2796
Mar-18	8	45	2741
Apr-18	13	115	2775
May-18	25	130	2752
Jun-18	17	66	2706
Jul-18	16	108	2129
Aug-18	27	169	1786
Sep-18	22	123	1411
Oct-18	53	309	1595
Nov-18	97	564	2054
Dec-18	151	885	2833
South Crane permit limits		17,200 gal/yr	

## STATIONARY IC EMISSION TEST

<b>Company:</b>	DOS CUADRAS OFFSHORE RESOURCES	<b>Platform:</b>	GILDA
<b>Date:</b>	April 24, 2018	<b>Equipment:</b>	NORTH CRANE
<b>Quarter:</b>	2Q 2018	<b>Manufacturer:</b>	CATERPILLAR
<b>Field Technician:</b>	JESSE VANHOY	<b>Model Number:</b>	3406
<b>Combustion Analyzer:</b>	TESTO 350 SN: 01136757	<b>Fuel Type:</b>	#2 DIESEL

	TEST 1	TEST 5	TEST 10	AVERAGE	
<b>RPM</b>	1775	1775	1775	1775	
<b>O2</b>	12.69	11.61	12.66	12.32	
<b>CO</b>	49	40	39	43	
<b>NOX</b>	718	846	705	756	<b>LIMIT</b>
<b>CO corrected to 15% O2</b>	35	25	28	30	49
<b>NOX corrected to 15% O2</b>	516	537	505	519	

**COMMENTS:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_





### STATIONARY IC EMISSION TEST

Company: DOS CUADRAS OFFSHORE RESOURCES Platform: GILDA  
Date: April 24, 2018 Equipment: SOUTH CRANE  
Quarter: 2Q 2018 Manufacturer: CATERPILLAR  
Field Technician: JESSE VANHOY Model Number: 3406  
Combustion Analyzer: TESTO 350 SN: 01136757 Fuel Type: #2 DIESEL

	TEST 1	TEST 5	TEST 10	AVERAGE	
RPM	1775	1775	1775	1775	
O2	13.33	13.01	13.19	13.18	
CO	26	24	28	26	
NOX	633	679	664	659	LIMIT
CO corrected to 15% O2	20	18	21	20	49
NOX corrected to 15% O2	493	508	508	503	

COMMENTS:

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

**Gilda North Crane**

Oil / Filter Change	7/6/2015	10/28/2016	8/18/2017	8/17/2018
Air Cleaner Inspection	7/6/2015	10/28/2016	8/18/2017	8/17/2018
Belt / Hose Inspection	7/6/2015	10/28/2016	8/18/2017	8/17/2018

**Gilda South Crane**

Oil / Filter Change	10/22/2015	6/11/2016	1/20/2017	3/16/2018
Air Cleaner Inspection	10/22/2015	6/11/2016	1/20/2017	3/16/2018
Belt / Hose Inspection	10/22/2015	6/11/2016	1/20/2017	3/16/2018

**Gilda Emergency Generator**

Oil / Filter Change	8/10/2015	*	12/27/2017	12/12/2018
Air Cleaner Inspection	8/10/2015	*	12/27/2017	12/12/2018
Belt / Hose Inspection	8/10/2015	*	12/27/2017	12/12/2018

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

\*325 hp emergency generator removed from service and replaced with new 619 hp emergency generator on 7/29/2016. 2016 engine maintenance was not conducted on either the old or the new emergency generator.

PLATFORM GILDA  
UNIFLUX HEATER

4.00 MMBtu/hr, Natural Gas Uniflux Lo-NOx

	Usage		12 Mo 'Rolling' Total
	Natural gas		Natural gas
	MCF	MMSCF	MMSCF
Jan-17	1023	1.02	12.05
Feb-17	931	0.93	11.94
Mar-17	1033	1.03	11.67
Apr-17	1007	1.01	11.45
May-17	1021	1.02	11.70
Jun-17	986	0.99	11.98
Jul-17	1024	1.02	12.27
Aug-17	1011	1.01	12.17
Sep-17	965	0.97	12.10
Oct-17	1034	1.03	12.11
Nov-17	1001	1.00	12.08
Dec-17	926	0.93	11.96
Jan-18	805	0.81	11.74
Feb-18	919	0.92	11.73
Mar-18	1009	1.01	11.71
Apr-18	701	0.70	11.40
May-18	822	0.82	11.20
Jun-18	622	0.62	10.84
Jul-18	838	0.84	10.65
Aug-18	863	0.86	10.51
Sep-18	836	0.84	10.38
Oct-18	881	0.88	10.22
Nov-18	843	0.84	10.07
Dec-18	871	0.87	10.01

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

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

Days	2018		January	February	March	April	May	June	July	August	September	October	November	December
	MCF	MCF												
1	31	39	31	33	28	0	27	27	27	27	27	30	25	25
2	31	39	31	33	28	0	27	27	28	28	27	29	30	30
3	31	39	31	33	28	0	29	29	28	28	27	31	29	29
4	31	38	31	33	29	0	29	29	27	27	27	26	27	27
5	31	37	31	0	28	0	29	29	27	27	28	26	27	27
6	31	36	31	0	27	0	11	27	27	27	28	27	28	28
7	31	38	31	0	29	0	29	29	27	27	28	28	27	27
8	31	31	32	0	28	13	29	29	27	27	28	28	38	38
9	31	31	32	0	28	28	29	29	27	27	28	27	27	27
10	38	31	32	0	29	27	29	29	25	25	29	29	28	26
11	31	30	31	24	27	27	28	28	28	28	26	29	29	29
12	31	31	31	30	29	27	27	27	29	29	28	27	28	28
13	31	31	31	24	30	1	27	27	27	27	28	27	29	29
14	31	31	32	31	28	31	27	27	27	27	28	27	28	28
15	1	31	34	29	29	30	27	27	27	27	28	29	27	27
16	0	32	35	27	29	30	28	28	27	27	28	28	30	30
17	0	32	35	29	31	31	18	27	27	27	28	29	27	27
18	0	32	35	29	30	31	27	27	27	27	28	30	28	28
19	3	31	35	29	31	31	28	28	27	27	28	30	27	27
20	29	31	33	31	31	31	28	28	27	27	28	30	27	27
21	31	31	35	30	31	28	28	28	27	27	27	29	28	28
22	30	31	33	31	30	28	28	28	27	27	24	27	27	27
23	30	31	33	28	30	28	28	28	37	37	28	42	27	27
24	30	31	33	28	30	28	28	28	30	30	28	27	27	27
25	30	31	33	29	30	28	28	28	27	27	30	27	30	30
26	30	31	32	28	30	28	27	28	30	30	28	27	27	27
27	30	31	33	28	30	28	27	27	27	27	30	27	27	27
28	30	31	33	28	30	30	30	30	31	31	28	27	29	29
29	30	0	33	28	4	30	27	30	30	30	30	27	28	28
30	30	0	33	28	0	28	27	27	27	27	28	27	27	27
31	30	0	33	0	0	0	27	27	27	27	0	27	0	28
<b>TOTALS</b>	<b>805</b>	<b>919</b>	<b>1,009</b>	<b>701</b>	<b>822</b>	<b>622</b>	<b>838</b>	<b>863</b>	<b>836</b>	<b>881</b>	<b>843</b>	<b>871</b>		

YTD 10,010 MCF



### STATIONARY IC EMISSION TEST

Company: DOS CUADRAS OFFSHORE RESOURCES Platform: GILDA  
Date: April 24, 2018 Equipment: UNIFLUX HEATER  
Quarter: 2Q 2018 Manufacturer / Model: MOBILTHERM 600  
Field Technician: JESSE VANHOY Serial Number: 4302  
Combustion Analyzer: TESTO 350 SN: 01136757 Fuel Type: NATURAL GAS

	TEST 1	TEST 2	TEST 3	TEST 4	AVERAGE	
RPM	1765	1765	1765	1765	1765	
O2	6.85	7.18	9.93	10.11	8.52	
CO	310	296	229	220	264	
NOX	16	17	14	14	15	LIMIT
CO corrected to 3% O2	395	386	374	365	380	400
NOX corrected to 3% O2	20	22	23	23	22	30

COMMENTS:

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**Platform Gilda - PTO 01492**

**619 BHP Caterpillar Diesel Engine  
Monthly Summary**

2017

	Non-Emergency Use		Emergency Use
	Total	Maintenance and Testing Total	Total
	<i>hrs</i>	<i>hrs</i>	<i>hrs</i>
January	0.90	0.90	0.00
February	0.80	0.80	0.00
March	1.50	1.50	0.00
April	1.00	1.00	0.00
May	0.90	0.90	0.00
June	1.10	1.10	0.00
July	1.80	1.80	0.00
August	1.30	1.30	0.00
September	1.40	1.40	0.00
October	1.30	1.30	0.00
November	1.20	1.20	0.00
December	0.80	0.80	10.10
<b>Total</b>	<b>14.00</b>	<b>14.00</b>	<b>10.10</b>



**Platform Gilda - PTO 01492**

**619 BHP Caterpillar Diesel Engine  
Monthly Summary**

2018

	Non-Emergency Use		Emergency Use
	Total	Maintenance and Testing Total	Total
	<i>hrs</i>	<i>hrs</i>	<i>hrs</i>
January	1.40	1.40	3.10
February	1.70	1.70	1.30
March	1.10	1.10	0.00
April	1.70	1.70	0.00
May	1.20	1.20	0.00
June	0.90	0.90	30.90
July	1.90	1.90	3.00
August	1.30	1.30	0.00
September	1.70	1.70	2.20
October	1.70	1.70	0.00
November	0.90	0.90	0.00
December	2.00	2.00	0.00
<b>Total</b>	<b>17.50</b>	<b>17.50</b>	<b>40.50</b>




# VISUAL EMISSION INSPECTION LOG

Dos Cuadras Offshore Resources

FACILITY: Platform Gilda

DATE: 4/24/2018

Start Time	End Time	Equipment					VISIBLE EMISSION? (YES/NO)	 Air Quality Training Program Awards That Certify the <b>Jesse VanHoy</b> <small>For Completion of</small> <b>MM106 - Visible Emissions Evaluation: Day Certification</b> <small>Issued: 10/11/2017</small> <small>Valid thru</small> <small>Thursday, October 11, 2017</small> <small>Certification Expires Six Months From Certification Date</small>
		North Crane	South Crane	PRODUCTION STDY GEN	Flare	HTM		
9:35 AM	9:38 AM		X				NO	<i>[Signature]</i>
10:40 AM	10:43 AM	X					NO	<i>[Signature]</i>
11:00 AM	11:03 AM			X			NO	<i>[Signature]</i>
11:15 AM	11:18 AM				X		NO	<i>[Signature]</i>
12:20 PM	12:23 PM					X	NO	<i>[Signature]</i>

Comments:



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

**Crew Boat Fuel Usage**

	Total Fuel	Gina 25%	Gilda 75%
Jan-17	11,543	2,886	8,657
Feb-17	10,776	2,694	8,082
Mar-17	10,550	2,638	7,913
Apr-17	8,851	2,213	6,638
May-17	11,550	2,888	8,663
Jun-17	13,100	3,275	9,825
Jul-17	13,414	3,354	10,061
Aug-17	19,027	4,757	14,270
Sep-17	17,220	4,305	12,915
Oct-17	12,275	3,069	9,206
Nov-17	10,575	2,644	7,931
Dec-17	9,816	2,454	7,362
Jan-18	12,425	3,106	9,319
Feb-18	10,125	2,531	7,594
Mar-18	11,250	2,813	8,438
Apr-18	15,675	3,919	11,756
May-18	11,950	2,988	8,963
Jun-18	12,675	3,169	9,506
Jul-18	11,075	2,769	8,306
Aug-18	11,300	2,825	8,475
Sep-18	9,300	2,325	6,975
Oct-18	9,027	2,257	6,770
Nov-18	9,900	2,475	7,425
Dec-18	9,951	2,488	7,463
<b>2018 Total</b>	<b>33,663</b>	<b>100,990</b>	

**Supply Boat Fuel Usage**

	Gina		Gilda	
	Mains	Aux	Mains	Aux
Jan-17	1,644	69	4,932	206
Feb-17	766	32	2,299	96
Mar-17	0	0	0	0
Apr-17	0	0	0	0
May-17	26	1	77	3
Jun-17	0	0	0	0
Jul-17	1,418	59	4,254	177
Aug-17	2,676	112	8,028	335
Sep-17	1,356	57	4,068	170
Oct-17	0	0	0	0
Nov-17	0	0	0	0
Dec-17	0	0	0	0
Jan-18	0	0	0	0
Feb-18	0	0	0	0
Mar-18	0	0	0	0
Apr-18	0	0	0	0
May-18	0	0	0	0
Jun-18	20	1	59	3
Jul-18	0	0	0	0
Aug-18	0	0	0	0
Sep-18	137	6	411	17
Oct-18	894	37	2,682	112
Nov-18	1,945	81	5,854	244
Dec-18	1,782	74	5,346	223
<b>2018 Total</b>	<b>4,778</b>	<b>199</b>	<b>14,353</b>	<b>599</b>

	Rolling 12 Mo Total	
	Gina	Gilda
40,723	122,169	
41,704	125,113	
40,192	120,576	
39,986	119,959	
40,119	120,357	
40,344	121,032	
42,550	127,649	
45,312	135,935	
48,185	144,557	
47,715	143,144	
47,258	141,776	
45,389	136,166	
43,897	131,690	
42,936	128,807	
43,111	129,332	
44,817	134,450	
44,890	134,670	
44,805	134,414	
42,743	128,228	
38,024	114,071	
34,774	104,321	
34,893	104,679	
36,751	110,271	
38,641	115,941	

2018 Total 33,663 100,990

2018 Total 4,778 199 14,353 599

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	ROC TPY	NOx TPY	PM TPY	SOx TPY	CO TPY
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					
Apr-17	0.663	11.216	0.670	0.150	2.039	1.988	33.649	2.009	0.450	6.118					
May-17	0.665	11.253	0.672	0.150	2.046	1.995	33.760	2.016	0.451	6.138					
Jun-17	0.669	11.317	0.676	0.151	2.058	2.006	33.950	2.027	0.454	6.173					
Jul-17	0.705	11.935	0.713	0.160	2.170	2.116	35.805	2.138	0.479	6.510					
Aug-17	0.751	12.710	0.759	0.170	2.311	2.253	38.130	2.277	0.510	6.933					
Sep-17	0.799	13.516	0.807	0.181	2.457	2.396	40.548	2.421	0.542	7.372					
Oct-17	0.791	13.384	0.799	0.179	2.433	2.373	40.152	2.398	0.537	7.300					
Nov-17	0.783	13.256	0.792	0.177	2.410	2.350	39.768	2.375	0.532	7.231					
Dec-17	0.752	12.732	0.760	0.170	2.315	2.257	38.195	2.281	0.511	6.944					
Jan-18	0.728	12.313	0.735	0.165	2.239	2.183	36.939	2.206	0.494	6.716					
Feb-18	0.712	12.043	0.719	0.161	2.190	2.135	36.130	2.158	0.483	6.569					
Mar-18	0.715	12.093	0.722	0.162	2.199	2.144	36.278	2.166	0.485	6.596					
Apr-18	0.285	5.421	0.257	0.168	2.575	0.855	16.264	0.772	0.504	7.725					
May-18	0.286	5.430	0.258	0.168	2.579	0.857	16.291	0.774	0.505	7.737					
Jun-18	0.285	5.420	0.257	0.168	2.574	0.856	16.260	0.772	0.504	7.723					
Jul-18	0.272	5.171	0.246	0.160	2.456	0.816	15.512	0.737	0.481	7.367					
Aug-18	0.242	4.600	0.218	0.143	2.185	0.726	13.799	0.655	0.428	6.554					
Sep-18	0.221	4.207	0.200	0.130	1.998	0.664	12.620	0.599	0.391	5.994					
Oct-18	0.222	4.221	0.200	0.131	2.005	0.666	12.663	0.601	0.393	6.014					
Nov-18	0.234	4.446	0.211	0.138	2.112	0.702	13.339	0.634	0.414	6.336					
Dec-18	0.246	4.674	0.222	0.145	2.220	0.738	14.025	0.666	0.435	6.661					

Tier 0 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

Tier 2 Emission Factors	
ROC	12.73 lb/Mgal
NOx	241.94 lb/Mgal
PM	11.49 lb/Mgal
SOx	7.50 lb/Mgal
CO	114.91 lb/Mgal

Permitted Emissions	
Pit Gina	Pit Gilda
ROC	1.40
NOx	23.68
PM	1.41
SOx	0.31
CO	4.31

**Platforms Gina and Gilda Crew and Supply Boats  
January 2018 - December 2018  
Log of Boats Operating**

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

**Crew Boats:**

Capt T Le  
Patrick

**Supply Boats:**

Ryan T  
Alan T  
Masco Endeavor

**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

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

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

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

Masco Endeavor  
2 - 1000 BHP Diesel Main Engines, Cummins QSK 38-MI  
2 - 223 BHP Diesel Generator Engines, John Deere  
1 - 330 BHP Diesel Bow Thruster, Cummins QSL 9 Tunnel  
Total BHP            2776



## Letter of Conformance

January 17, 2019

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to DCOR, LLC FOR PLATFORMS GINA & GILDA FROM 1/1/18-12/31/18.

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*

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



## Letter of Conformance

February 7, 2019

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

DCOR, LLC From 1/1/2018-12/31/2018

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

# *Ventura Harbor Marine Fuel, Inc*

1551 Spinnaker Dr. Ventura CA 9300 • 805-644-4046 • Fax: 805-644-4306 • [vhmf@sbcglobal.net](mailto:vhmf@sbcglobal.net) • [www.vhmf.com](http://www.vhmf.com)

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February 7, 2019

## Certificate of Compliance

This is to certify that the CARB ultra low sulfur diesel sold and delivered to DCOR in Ventura Harbor from 1/1/18 thru 12/31/18 was in compliance with South Coast Air Quality Management District Requirements for Santa Barbara, Ventura and Los Angeles counties. The test results meet ASTM D-4294 and are typical of all CARB ultra low sulfur dyed diesel sold by Ventura Harbor Marine Fuel, Inc. The sulfur content is guaranteed to be less than .0015% (15 ppm).



Eric & Jose  
Manager, Ventura Harbor Marine Fuel, Inc.

**VENTURA COUNTY APCD  
RULE 74.10  
COMPONENT LEAK REPORT  
Report for the 1st Quarter of 2018**

FACILITY: <u>DCOR, PLATFORM GILDA</u>						PERMIT#: <u>1492</u>	
Method of Inspection: <u>TVA</u>	Components	Valves	Others	Pumps	Compres.	PRV's	
	Accessible Inspected:	2,820	18,267	0	3	0	
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	
	Total # Leaking:	1	0	0	0	0	
	% Leaking:	0.04%	0.00%	0.00%	0.00%	0.00%	
Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
Valve - Ball	Well S - 71 (Production Well)	03/20/2018 8:45AM	03/20/2018 8:45AM	8950 PPM	N	03/27/2018 10:00AM	0 PPM

**VENTURA COUNTY APCD  
RULE 74.10  
COMPONENT LEAK REPORT  
Report for the 2nd Quarter of 2018**

FACILITY: DCOR, PLATFORM GILDA

PERMIT#: 1492

<b>Method of Inspection:</b> <u>TVA</u>	<b>Components</b>	<b>Valves</b>	<b>Others</b>	<b>Pumps</b>	<b>Compres.</b>	<b>PRV's</b>
	Accessible Inspected:	2,820	18,267	0	3	0
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A
	<b>Total # Leaking:</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	<b>% Leaking:</b>	<b>0.07%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.00%</b>

Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
Valve - Shut Down	K - 03 (Compressor)	06/19/2018 10:15AM	06/19/2018 10:15AM	47000	N/A	06/19/2018 10:40AM	24.2
Valve - Ball	K - 03 (Compressor)	06/19/2018 10:25AM	06/19/2018 10:25AM	22,600	N/A	06/19/2018 10:55PM	8.1



**VENTURA COUNTY APCD**  
**RULE 74.10**  
**COMPONENT LEAK REPORT**  
 Report for the 3rd Quarter of 2018

FACILITY: <u>DCOR PLATFORM GILDA</u>						PERMIT#: <u>1492</u>
<b>Method of Inspection:</b> <u>TVA</u>	<b>Components</b>	<b>Valves</b>	<b>Others</b>	<b>Pumps</b>	<b>Compres.</b>	<b>PRV's</b>
	Accessible Inspected:	2,820	18,267	0	3	0
	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A
	Total # Leaking:	0	0	0	0	0
	% Leaking:	0.00%	0.00%	0.00%	0.00%	0.00%

Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
<b>No Reportable Leaks Found this Quarter</b>							
<b>Inspected on 9/11/2018</b>							

**VENTURA COUNTY APCD  
 RULE 74.10  
 COMPONENT LEAK REPORT  
 Report for the 4th Quarter of 2018**

**FACILITY: DCOR, PLATFORM GILDA**

**PERMIT#: 1492**

<b>Method of Inspection:</b> <u>TVA</u>	<b>Components</b>	<b>Valves</b>	<b>Others</b>	<b>Pumps</b>	<b>Compres.</b>	<b>PRV's</b>
	<b>Accessible Inspected:</b>	2,820	18,267	0	3	0
	<b>Inacc. Insp. To Date:</b>	N/A	N/A	N/A	N/A	N/A
	<b>Total # Leaking:</b>	1	0	0	0	0
	<b>% Leaking:</b>	0.04%	0.00%	0.00%	0.00%	0.00%

Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid major/min	Repair Date	Post Repair Rate (ppmv)
54485.00	Well S - 26 (Well Bay 3)	12/18/2018 01:40PM	12/18/2018 01:40PM	9980	NA	12/22/2018 5:00PM	0

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

	Pilot	Planned	Unplanned	12 Month 'Rolling' Total	
	MCF	MCF	MCF	Pilot MMCF	Planned MMCF
Jan-17	70	0	879	0.85	4.94
Feb-17	65	0	453	0.87	4.94
Mar-17	66	0	63	0.85	4.94
Apr-17	67	0	35	0.84	4.93
May-17	69	0	458	0.82	0.31
Jun-17	65	0	1359	0.81	0.12
Jul-17	69	2	19	0.80	0.00
Aug-17	66	0	481	0.84	0.00
Sep-17	64	0	275	0.83	0.00
Oct-17	66	0	123	0.82	0.00
Nov-17	65	0	24	0.81	0.00
Dec-17	65	4	384	0.80	0.01
Jan-18	51	8	626	0.78	0.01
Feb-18	56	0	11792	0.77	0.01
Mar-18	62	360	1777	0.76	0.37
Apr-18	60	0	8317	0.76	0.37
May-18	62	2279	93	0.75	2.65
Jun-18	60	5492	1728	0.75	8.15
Jul-18	62	20	1060	0.74	8.16
Aug-18	62	0	48	0.73	8.16
Sep-18	60	99	738	0.73	8.26
Oct-18	60	0	152	0.72	8.26
Nov-18	62	0	24	0.72	8.26
Dec-18	64	0	119	0.72	8.26

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

# FLARING AT GILDA

Record all flaring > 10 minutes. Record H2S 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 lasting longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an BSEE Variance.

**Jan-18**

DATE	Start Time	Stop Time	H2S PPM	Planned or Unplanned	Volume (MCF)	Entered By	REASON FOR FLARING
1/8/18	18:29	18:34	0	Unplanned	5	LV	Partial Platform S/D - Amine Plant to Flare
1/9/18	13:00	13:02	0	Unplanned	3	H Collins	Acid Gas S/D
1/15/18	3:30	3:35	0	Planned	5	H Collins	Platform S/D for Maintenance
1/19/18	14:00	14:02	0	Planned	3	H Collins	Platform S/D for Maintenance
1/19/18	21:30	21:33	0	Unplanned	5	JW	Start up of Platform after Maintenance S/D
1/21/18	7:30	10:30	0	Unplanned	211	JW	MOSF Gas Line S/I Low Temp
1/22/18	21:54	21:56	0	Unplanned	2	H Collins	Inlet Scrubber LSL - Acid Gas S/D
1/24/18	0:35	8:35	0	Unplanned	280	JW	MOSF High CO2
1/24/18	10:19	10:27	0	Unplanned	9	JW	Platform S/D - Fire eye
1/24/18	11:30	11:35	0	Unplanned	4	JW	GC-#2 S/D
1/25/18	2:35	13:30	0	Unplanned	105	AD	MOSF High CO2
1/31/18	12:50	13:00	0	Unplanned	2	AD	PSL on Shipping Line

# FLARING AT GILDA

Record all flaring > 10 minutes. Record H2S 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  
 A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an BSEE Variance.

**Feb-18**

DATE	Start Time	Stop Time	H2S PPM	Planned or Unplanned	Volume (MCF)	Entered By	REASON FOR FLARING
2/6/18	15:30	18:15	0	UNPLANNED	127	JW	So Cal Shut in Gas Line - Wet Gas
2/7/18	10:00	0:00	0	UNPLANNED	524	TH	So Cal Shut in Gas Line - Wet Gas
2/8/18	0:00	0:00	0	UNPLANNED	820	AD/RT	So Cal Shut in Gas Line - Wet Gas
2/9/18	0:00	0:00	0	UNPLANNED	1144	RT	So Cal Shut in Gas Line - Wet Gas
2/10/18	0:00	0:00	0	UNPLANNED	1340	RT	So Cal Shut in Gas Line - Wet Gas
2/11/18	0:00	0:00	0	UNPLANNED	1363	RT	So Cal Shut in Gas Line - Wet Gas
2/12/18	0:00	0:00	0	UNPLANNED	1253	RT	So Cal Shut in Gas Line - Wet Gas
2/13/18	0:00	0:00	0	UNPLANNED	916	RT	So Cal Shut in Gas Line - Wet Gas
2/14/18	0:00	0:00	0	UNPLANNED	1216	RT	So Cal Shut in Gas Line - Wet Gas
2/15/18	0:00	17:00	0	UNPLANNED	650	LV	So Cal Shut in Gas Line - Wet Gas
2/16/18	18:15	0:00	0	UNPLANNED	371	JW	So Cal Shut in Gas Line - Wet Gas
2/17/18	0:00	15:20	0	UNPLANNED	633	LV	So Cal Shut in Gas Line - Wet Gas
2/20/18	8:05	11:15	0	UNPLANNED	126	LV	So Cal Shut in Gas Line - Wet Gas
2/20/18	23:00	0:00	0	UNPLANNED	40	JW	So Cal Shut in Gas Line - Wet Gas
2/21/18	0:00	9:20	0	UNPLANNED	371	LV	Gas Line Shut in due to Low Temp
2/22/18	0:00	8:55	0	UNPLANNED	210	JG	Gas Line Shut in due to Low Temp
2/23/18	7:30	9:00	0	UNPLANNED	60	JG	Gas Line Shut in due to Low Temp
2/23/18	23:30	0:00	0	UNPLANNED	21	RT	Gas Line Shut in due to Low Temp
2/24/18	0:00	9:00	0	UNPLANNED	145	JG	Gas Line Shut in due to Low Temp
2/25/18	0:00	8:45	0	UNPLANNED	140	RT	Gas Line Shut in due to Low Temp
2/26/18	2:45	9:00	0	UNPLANNED	110	JG	Gas Line Shut in due to Low Temp
2/27/18	3:00	8:50	0	UNPLANNED	95	JG	Gas Line Shut in due to Low Temp
2/27/18	23:00	0	0	UNPLANNED	7	RT	Gas Line Shut in due to Low Temp
2/28/18	0	8:45	0	UNPLANNED	110	JG	Gas Line Shut in due to Low Temp

# FLARING AT GILDA

Mar-18

Record all flaring > 10 minutes. Record H2S 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					
DATE	Start Time	Stop Time	H2S PPM	Planned or Unplanned	Volume (MCF)	Entered By	REASON FOR FLARING
3/1/2018	00:30	09:00	0	UNPLANNED	342	lv	gas line s/i @ mosf , due to cold temps
3/3/2018	18:15	18:16	0	UNPLANNED	1	lv	sending gas pig, bled off pig launcher
3/4/2018	02:00	09:25	0	UNPLANNED	266	lv	gas line shut in due to cold weather .
3/5/2018	00:00	07:00	0	UNPLANNED	248	lv	gas line shut inn due to cold weather.
3/8/2018	02:00	08:45	0	UNPLANNED	205	ARMANDO DE ALBA	FLARE DUE TO LOW TEMP AT MOSF GAS LINE.
3/16/2018	05:30	09:00	0	UNPLANNED	130	James Woodruff	Gas Line shut in on Low Temp
3/16/2018	16:00	17:15	0	UNPLANNED	46	James Woodruff	Gas Line Shut in at MOSF
3/17/2018	08:00	09:00	0	UNPLANNED	36	James Woodruff	Stack Gas due to MOSF Shut in on Low Temp
3/18/2018	04:00	12:00	0	UNPLANNED	291	James Woodruff	Flared Gas due to Low Temp Shut in at MOSF
3/19/2018	04:50	10:00	0	UNPLANNED	192	TS	Flared Gas due to Low Temp Shut in at MOSF
3/23/2018	06:25	15:30	0	PLANNED	360	TS	MOSF installed new gas line for heat exchanger
3/24/2018	16:30	19:00	0	UNPLANNED	20	rtovar	Flared 20 MCFs due to send new gas pig

# FLARING AT GILDA

Record all flaring > 10 minutes. Record H2S 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

**Apr-18**

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

DATE	Start Time	Stop Time	H2S PPM	Planned or Unplanned	Volume (MCF)	Entered By	REASON FOR FLARING
4/1/2018	18:07	18:12	0	Unplanned	3	LV	platform shut down
4/5/2018	00:45	00:00	110	Unplanned	851	A.D.	HTM and Amine plant S/D, reboiler repairs ongoing
4/6/2018	00:00	00:00	100	Unplanned	951	A.D.	HTM and Amine plant S/D, reboiler repairs ongoing
4/7/2018	00:00	00:00	80	Unplanned	845	A.D.	HTM and Amine plant S/D, reboiler repairs ongoing
4/8/2018	00:00	00:00	65	Unplanned	739	A.D.	HTM and Amine plant S/D, reboiler repairs ongoing
4/9/2018	00:00	00:00	0	Unplanned	750	A.D.	HTM and Amine plant S/D, reboiler repairs ongoing
4/10/2018	00:00	00:00	60	Unplanned	780	A.D.	HTM and Amine plant S/D, reboiler repairs ongoing
4/11/2018	00:00	00:00	85	Unplanned	800	A.D.	HTM and Amine plant S/D, reboiler repairs ongoing
4/12/2018	00:00	00:00	0	Unplanned	800	J.W.	HTM and Amine plant S/D, reboiler repairs ongoing
4/13/2018	00:00	00:00	0	Unplanned	800	J.W.	HTM and Amine plant S/D, reboiler repairs ongoing
4/14/2018	00:00	00:00	55	Unplanned	558	J.W.	HTM and Amine plant S/D, reboiler repairs ongoing
4/15/2018	00:00	10:45	0	Unplanned	318	J.W.	HTM and Amine plant S/D, reboiler repairs ongoing
4/15/2018	18:03	19:03	0	Unplanned	3	J.W.	P/F S/D PSH on Shipping Tank
4/23/2018	17:00	17:30	0	Unplanned	21	CH	Amine Plant upset
4/26/2018	14:15	16:45	0	Unplanned	98	J.W.	MOSF issues





# FLARING AT GILDA

**Jun-18**

Record all flaring > 10 minutes. Record H2S 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  
 A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an BSEE Variance.

DATE	Start Time	Stop Time	H2S PPM	Planned or Unplanned	Volume (MCF)	Entered By	REASON FOR FLARING
6/1/18	0:00	0:00	85	Planned	739	AD	SCGC METER UPGRADE AT MOSF
6/2/18	0:00	0:00	80	Planned	762	AD	SCGC METER UPGRADE AT MOSF
6/3/18	0:00	0:00	80	Planned	747	AD	SCGC METER UPGRADE AT MOSF
6/4/18	0:00	0:00	70	Planned	738	AD	SCGC METER UPGRADE AT MOSF
6/5/18	0:00	0:00	75	Planned	734	AD	SCGC METER UPGRADE AT MOSF
6/6/18	0:00	0:00	70	Planned	729	AD	SCGC METER UPGRADE AT MOSF
6/7/18	0:00	0:00	35	Planned	571	AD	SCGC METER UPGRADE AT MOSF
6/8/18	0:00	12:15	35	Planned	472	AD	SCGC METER UPGRADE AT MOSF
6/13/18	0:48	1:30	0	unplanned	58	AD	SCGC METER UPGRADE AT MOSF
6/14/18	10:00	23:00	0	unplanned	226	RT	Gas Line Shut in at mosf due to high C02
6/15/18	3:30	7:30	0	unplanned	110	JC	Gas Line Shut in at mosf due to high C02
6/15/18	14:00	21:00	0	unplanned	185	JC	Gas Line Shut in at mosf due to high C02
6/15/2018	21:50	0:00	0	unplanned	55	RT	Gas Line Shut in at mosf due to high C02
6/16/2018	00:00	2:00	0	unplanned	38	RT	Gas Line Shut in at mosf due to high C02
6/16/2018	2:45	12:06	0	unplanned	228	RT	Gas Line Shut in at mosf due to high C02
6/16/2018	16:45	0:00	0	unplanned	198	RT	Gas Line Shut in at mosf due to high C02
6/17/2018	0:00	6:30	0	unplanned	143	RT	Gas Line Shut in at mosf due to high C02
6/17/2018	9:00	11:00	0	unplanned	66	JC	Gas Line Shut in at mosf due to high C02
6/17/2018	13:15	14:15	0	unplanned	22	JC	Gas Line Shut in at mosf due to high C02
6/17/2018	16:15	19:15	0	unplanned	71	RT	Gas Line Shut in at mosf due to high C02
6/18/2018	18:35	19:35	0	unplanned	32	RT	Gas Line Shut in at mosf due to high C02
6/19/2018	10:45	14:25	0	unplanned	98	RT	Gas Line Shut in at mosf due to high C02
6/19/2018	15:45	16:15	0	unplanned	14	JC	Gas Line Shut in at mosf
6/22/2018	0:15	0:17	0	unplanned	2	LV	AMINE PLANT SHUT DOWN
6/23/2018	20:54	21:00	0	unplanned	5	LV	POWER FLICKER
6/25/2018	11:20	13:10	0	unplanned	66	JW	MOSF WORKING ON CHILLER
6/25/2018	14:40	17:25	0	unplanned	99	JW	Gas Line Shut in at mosf
6/26/2018	10:20	10:40	0	unplanned	12	JW	MOSF WORKING ON CHILLER

# FLARING AT GILDA

Jul-18

DATE	Start Time	Stop Time	H2S PPM	Planned or Unplanned		Volume (MCF)	Entered By	REASON FOR FLARING
				H2S PPM	Planned or Unplanned			
7/6/18	9:00	0:00	0		unplanned	311	L.V	Htm fuel valve malfunction
7/7/18	0:00	2:30	0		unplanned	86	L.V	Htm shut down
7/7/18	8:00	11:00	0		unplanned	106	L.V	Power lost at mandalay
7/17/18	7:30	14:30	0		planned	20	J.C	Edison maintenance
7/17/18	19:00	19:02	0		unplanned	3	C.R	OIL LINE P.S.L
7/19/18	11:45	8:45	0		unplanned	351	L.V	stack gas line from gina to mandalay
7/23/18	15:05	20:15	0		unplanned	203	L.V	gas line shut in at mandalay

# FLARING AT GILDA

**Record all flaring > 10 minutes. Record H2S 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

**Aug-18**

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

DATE	Start Time	Stop Time	H2S PPM	Planned or Unplanned	Volume (MCF)	Entered By	REASON FOR FLARING
8/1/18	13:00	13:01	0	Unplanned	4	J.C.	Amine Plant Upset
8/8/18	18:31	18:51	0	Unplanned	13	J.W.	Power Flicker
8/9/18	8:43	8:45	0	Unplanned	4	A.D	Oil Shipping Line PSL
8/23/18	8:15	10:00	0	Unplanned	21	C.R.	GC-2 Lube Oil Pin Sheared
8/30/18	12:40	12:44	0	Unplanned	6	L.V.	Working on Amine Pump P-2B



# FLARING AT GILDA

Record all flaring > 10 minutes. Record H2S ppm, not "sweet" or "x"						Call in a Breakdown Report to VCAPCD within 4-hours for unplanned flaring lasting longer than 1-hour <b>only</b> if >300 ppm H2S		
<b>Oct-18</b>								
A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an BSEE Variance.								
DATE	Start Time	Stop Time	H2S PPM	Planned or Unplanned	Volume (MCF)	Entered By	REASON FOR FLARING	
10/2/18	13:15	13:17	0	Unplanned	2	JW	CIC Testing PSV's / PSV didn't seat after testing	
10/15/18	1:55	1:58	0	Unplanned	5	JC	GC#3 S/D	
10/9/18	18:00	18:10	0	Unplanned	10	AD	GC#3 lube oil filter leak S/D	
10/10/18	20:25	20:28	0	Unplanned	3	JC	Amine Plant upset	
10/13/18	20:48	21:48	0	Unplanned	37	JW	MOSF Air Compressor S/D - S/I Gas & Oil Lines	
10/14/18	2:25	5:25	0	Unplanned	94	JW	HTM S/D	
10/14/18	7:10	7:11	0	Unplanned	1	JB	Amine Plant S/D	

# FLARING AT GILDA

Record all flaring > 10 minutes. Record H2S 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

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

**Nov-18**

DATE	Start Time	Stop Time	H2S PPM	Planned or Unplanned	Volume (MCF)	Entered By	REASON FOR FLARING
11/2/18	4:45	4:47	0	UNPLANNED	2	C.H	WASTE OIL LSH /PLT/ S/D
11/6/18	12:00	12:02	0	UNPLANNED	2	A.D.	WELL CLEAN TANK PSH DUE TO PLC.
11/18/18	22:31	22:36	0	UNPLANNED	20	C.R.	LSH SHIPPING TANK.

# FLARING AT GILDA

Record all flaring > 10 minutes. Record H2S 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			Dec-18		
A) Unplanned flaring >300 ppm H2S is prohibited to last longer than 24 hrs. B) Unplanned flaring >300 ppm H2S lasting longer than 1-hr requires a Breakdown Report to APCD. C) Planned and unplanned flaring of <300 ppm gas only requires logging. D) Planned flaring >300 ppm H2S for any duration requires a 72-hr written notice to APCD. E) All flaring >48-hrs require an BSEE Variance.								
DATE	Start Time	Stop Time	H2S PPM	Planned or Unplanned	Volume (MCF)	Entered By	REASON FOR FLARING	
12/3/18	13:00	13:01	0	unplanned	4	AD	Flare due to oil line PSL	
12/11/18	15:00	16:30	0	unplanned	47	JB	Amine plant upset	
12/13/18	14:50	16:00	0	unplanned	40	CR	Bled S-60 to Well Clean Tank (PSH)	
12/14/18	15:00	15:01	0	unplanned	5	CR	Amine Plant - Reset	
12/19/18	23:00	23:30	0	unplanned	23	CH	MOSF Gas Line Shut In	