



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

RECEIVED
VENTURA COUNTY
2020 MAY 14 AM 10:35
A.P.C.D.

May 13, 2020

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

RE: Annual Compliance Certification Report
Platform Gina, PTO 1491

Dear Mr. Macias:

DCOR, LLC submits the enclosed Annual Compliance Verification report for Platform Gina as required by Part 70 Permit to Operate 1491. This report covers the time period of April 1, 2019 through March 31, 2020.

Please do not hesitate to contact me at 805-535-2074 with any questions.

Sincerely,

Christine White

Christine White
Senior Environmental / Legal Advisor

Enclosure

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



DCOR, LLC
2019 ANNUAL COMPLIANCE
CERTIFICATION REPORT
For the time period 4/1/19 – 3/31/20

PLATFORM GINA
PART 70
PERMIT TO OPERATE 1491

Submitted to:

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

Submitted by:

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

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DCOR, LLC – PLATFORM GINA – PTO 1491

2019

COMPLIANCE VERIFICATION REPORT

for the time period 4/1/19 – 3/31/20

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Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SIGNATURE COVER FORM

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


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

Confidentiality

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:  Title: ROBERT L. GARCIA VICE PRESIDENT	Date: 5.12.2020
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Time Period Covered by Compliance Certification 04/01/2019 to 03/31/2020
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SECTION 1

Compliance Certification

1.c. PERIODIC MONITORING SUMMARY

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

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

1.c.1. Specific Applicable Requirements

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.IN1	Rules 71.1.B.1.a, 74.10	<ul style="list-style-type: none"> • Quarterly inspection of the following components for proper operation: gas compressor, hatchets, relief valves, pressure regulators, flare, as applicable • Verbal notice of maintenance activities • Rule 74.10 inspections • Annual compliance certification including verification that tanks are equipped with a vapor recovery system 	<ul style="list-style-type: none"> • Records of quarterly inspections and tank maintenance activities • Rule 74.10 records 	None	None	
71.IN6	Rules 71.1.B.3, 71.1.D.1.c, 74.10	<ul style="list-style-type: none"> • Annual compliance certification including verification of the integrity of the roof and pressure-vacuum relief valve • Rule 74.10 inspections 	<ul style="list-style-type: none"> • Records of number of days the tank has stored or held crude oil during the maintenance operation, location of the tank relative to a tank battery, and whether tank was connected to vapor recovery • Records to show integrity of roof and PV valves for tanks not permanently located at facility • Rule 74.10 records 	None	None	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.4 N1	Rules 71.4 B.2 and 74.10	<ul style="list-style-type: none"> Verbal notice of maintenance operations Rule 74.10 inspections Annual compliance certification including verifying the integrity of the cover 	<ul style="list-style-type: none"> Records of maintenance Rule 74.10 records 	None	None	
74.9N9	Rule 74.9.D.9	<ul style="list-style-type: none"> Annual compliance certification Daily visual inspection to ensure diesel-fired engine is used to power cranes and welding equipment only 	<ul style="list-style-type: none"> Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location 	None	None	
ATCM Engine N3	ATCM for Stationary Compression Ignition Engines – OCS	<ul style="list-style-type: none"> Fuel type records Fuel use records 	<ul style="list-style-type: none"> Fuel type records Fuel use records 	None	None	Not federally enforceable
40CFR63ZZZN3	RICE MACT for emergency diesel engines – oil change and inspections	<ul style="list-style-type: none"> Maintenance records Use non-resettable hour meter Annual compliance certification 	<ul style="list-style-type: none"> Maintenance records Hours of operation records 	None	None	
40CFR63ZZZN5	RICE MACT for non-emergency diesel engines > 300 HP & ≤ 500 HP, CO ppm limit	<ul style="list-style-type: none"> Initial CO source testing Maintain catalyst pressure / temperature Annual compliance certification 	<ul style="list-style-type: none"> Initial CO testing records 	As specified in Sections 63.6650(c)(1) – (6)	Portable analyzer, or EPA Methods 3.4, and 10 or their designated alternatives	

1.c.2. Permit-Specific Conditions

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO149 PCI - Condition No. 1	Rule 29 General Recordkeeping	<ul style="list-style-type: none"> Annual compliance certification Monthly records of throughput and consumption 	<ul style="list-style-type: none"> Monthly records 	None	None	
PO149 PCI - Condition No. 2	Rule 29 Maximum Number of Oil Wells	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO149 PCI - Condition No. 3	Rule 26 BACT Well	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO149 PCI - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	<ul style="list-style-type: none"> Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery Annual compliance certification 	Fuel records	None	None	
PO149 PCI - Condition No. 5	Rules 26 and 29 Crew Boat and Work Boat Emission Limits	<ul style="list-style-type: none"> Rolling twelve month diesel fuel consumption for boats servicing Platforms Gina and Gilda 2.5% of usage for both platforms is the Gina usage. Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of diesel fuel consumption Monthly calculations of emissions (boats) 	None	None	
PO0149 PCI - Condition No. 6	Boat engine permitted emissions information	<ul style="list-style-type: none"> Information only 	<ul style="list-style-type: none"> Information only 	None	None	
PO149 PCI - Condition No. 7	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> Maintain a log book of hours and days of crew boat operation Maintain a log of boats and engines Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of crew boat operation Maintain a log of crew boats and engines 	None	None	
PO149 PCI - Condition No. 8	Rule 29 Two Work Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation Maintain a log of boats and engines Annual compliance certification 	<ul style="list-style-type: none"> Maintain a log book of hours and days of work boat operation Maintain a log of work boats and engines 	None	None	
PO149 PCI - Condition No. 9	Rules 23 and 29 Solvent Recordkeeping	<ul style="list-style-type: none"> Maintain a list of exempt solvents Annual compliance certification 	<ul style="list-style-type: none"> Maintain a list of exempt solvents 	None	None	
PO149 PC2 - Condition Nos. 1, 2, and 5	Rule 29 Flare Fuel Consumption	<ul style="list-style-type: none"> Fuel consumption Identify emergency vs. non-emergency usage Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of fuel consumption 	None	None	
PO149 PC2 - Condition Nos. 3 and 4	Rules 71.1 Flare Ignition System Operation	<ul style="list-style-type: none"> Monthly tests of flare's ignition system Annual compliance certification 	<ul style="list-style-type: none"> Records of ignition system Maintenance records 	None	None	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO149 PC3 - Condition No. 1	Rules 26 and 74.9 200 hours per year backup utility generator operation	<ul style="list-style-type: none"> Annual compliance certification Monthly records of backup utility generator hours of operation 	<ul style="list-style-type: none"> Hours of operation log (non-resettable meter) differentiating non-emergency use and emergency use Monthly and twelve month rolling records of hours of operation 	None	None	
PO149 PC3 - Condition Nos. 2 and 3	Rule 74.9 200 hours per year / emergency use exemptions	<ul style="list-style-type: none"> Annual compliance certification Recordkeeping 	<ul style="list-style-type: none"> Hours of operation log (non-resettable meter) Monthly and twelve month rolling records of hours of operation 	None	None	

1.c.3. General Applicable Requirements

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

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

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

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

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

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

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

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

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

M:\TITLEVTV Permits\PO1491\Permit IV\Periodic Monitoring Table-rev361.docx

SECTION 2

Breakdowns, Deviations, and Excess Emissions

PTO 1491: PLATFORM GINA

Reporting Period: April 1, 2019 through March 31, 2020

There were no (0) Breakdown Reports filed during this reporting period.

There were no (0) Deviation Reports filed during this reporting period.

There were no (0) excess emissions during this reporting period.

Excess Emissions

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

SECTION 3

Specific Applicable Requirements



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 74.9N9</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description: Stationary Internal Combustion Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: All crane and welder IC engines are diesel fired. These engines are used to power the cranes and welders only.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> 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 #: ATCM Engine N3</p>	<p>D. Frequency of monitoring: Daily, Annually</p>
<p>B. Description: Stationary Internal Combustion Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Use of CARB Diesel; Recordkeeping.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> 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: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR 63 ZZZZ N3 (RICE MACT)</p>	<p>D. Frequency of monitoring: Daily, Annually</p>
<p>B. Description: NESHAP for Stationary RICE, Emergency Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Change oil filter every 500 hours or annually. Inspect air cleaner every 1,000 hours or annually. Inspect all hoses and belts every 500 hours or annually. Emergency Use operations as specified. Recordkeeping.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40 CFR 63 ZZZZ N5 (RICE MACT)</p>	<p>D. Frequency of monitoring: Daily, Annually</p>
<p>B. Description: NESHAP for Stationary RICE, Non-Emergency Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Minimize engine idle time. Comply with applicable emission standards. Use of nonroad diesel. Initial performance test. Recordkeeping.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> 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 4

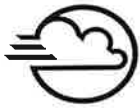
Permit Specific Conditions



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

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

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

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



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

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

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

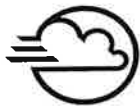


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Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 2 Section 1, 2, and 5</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Flare Fuel Consumption: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Monthly records of fuel consumption and flare activity monitored by individual fuel meters on the flare.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 2 Sections 3 and 4</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Flare Ignition System: Rule 71.1</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Monthly testing of flare ignition system.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

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

<p>A. Attachment # or Permit Condition #: PTO 1491 Condition 3 Sections 2 and 3</p>	<p>D. Frequency of monitoring: Monthly and 12-Month Rolling Average</p>
<p>B. Description: New Source Review: Rule 26; and, Stationary Internal Combustion Engines: Rule 74.9</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Non-resettable hour meters are installed on the back-up utility generator. Logs are maintained of the daily usage. The engine is used less than 200 hours per calendar year and less than 50 hours during routine maintenance and the therefore exempt from Rule 74.9, "Stationary Internal Combustion Engines."</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> 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

General Applicable Requirements



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

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

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

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



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Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

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

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

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



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Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

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

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

<p>A. Attachment # or Permit Condition #: Rule 71.4.B3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Petroleum Sumps, Pits, and Well Cellars - Well Cellar Storage Prohibition</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: There are no well cellars on Platform Gina. Offshore platforms are equipped with non-leaking stuffing boxes, oil is never stored in an open "pit" or cellar.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 74.6</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Surface Cleaning and Degreasing</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Monthly records maintained of quantity of solvent use and purchases for solvents with ROC content of 25 grams per liter or greater. Chemco 33-S has ROC content of 44 grams/liter and is only used when diluted 1:1 with water. No other solvents with ROC content of 25 grams per liter or greater were used.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.10</p>	<p>D. Frequency of monitoring: Daily, Quarterly, Annually</p>
<p>B. Description: Components at Crude Oil and Natural Gas Production Processing Facilities</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Maintain a fugitive emission inspection and maintenance program that is consistent with the requirements of Rule 74.10.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.11.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Large Water Heaters and Small Boilers</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Platform Gina has no water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than 75,000 BTU/hr and less than or equal to 1,000,000 BTU/hr.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

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

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 74.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Abrasive Blasting</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Visible emission evaluation during abrasive blasting operations. Use of California Certified abrasive sands.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.2</p>	<p>D. Frequency of monitoring: Monthly Records, Annual Compliance Certification</p>
<p>B. Description: Architectural Coatings</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Maintain records of all architectural coatings used. Calculate ROC content in grams per liter in accordance to Table of Standards in Rule 74.2. Maintain records of products used, MSDS and or product data sheets.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.16</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Oilfield Drilling Operations</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: All drilling operations powered by grid power, or have exemption from grid power.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 61, Subpart M</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: National Emission Standard for Asbestos</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: No asbestos demolition or renovation activities took place during the period of 4/1/2019 through 3/31/2020.</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>



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Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Part 70 General</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: General Part 70 Permit Conditions</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1491</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 #: PO General</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: General Permit to Operate Conditions</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1491</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: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

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

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

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 60, Subpart OOOO</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: NSPS for Crude Oil and Natural Gas Production, Transmission and Distribution</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1491 and VCAPCD Rules</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> 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 7

Supporting Documentation

PLATFORM GINA DIESEL CRANE FUEL USAGE

GINA	CRANE		
	325 bhp CAT 3406B		
	Hrs.	Gal.	12 Mo. Rolling Total Gal
Apr-18	8	52	1,312
May-18	8	49	1,301
Jun-18	8	53	1,294
Jul-18	6	36	1,258
Aug-18	6	29	981
Sep-18	38	169	728
Oct-18	37	231	834
Nov-18	11	72	851
Dec-18	8	51	868
Jan-19	7	39	843
Feb-19	10	52	844
Mar-19	7	44	875
Apr-19	3	21	845
May-19	4	26	822
Jun-19	6	35	805
Jul-19	4	24	794
Aug-19	6	35	800
Sep-19	3	15	647
Oct-19	5	27	443
Nov-19	9	54	425
Dec-19	5	62	436
Jan-20	12	40	437
Feb-20	7	37	421
Mar-20	5	20	397
Crane permit limits		2,870 gal/yr	

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

	HOURS		HOURS	
	Non-Emergency	Emergency	Monthly Total	12-Mo Rolling Total
Apr-19	0.8	0.0	0.8	73.2
May-19	1.0	0.0	1.0	73.6
Jun-19	0.9	0.0	0.9	73.8
Jul-19	0.8	0.0	0.8	72.1
Aug-19	0.9	0.0	0.9	70.8
Sep-19	1.0	0.0	1.0	70.9
Oct-19	1.1	0.0	1.1	70.9
Nov-19	0.6	0.0	0.6	70.8
Dec-19	0.7	0.0	0.7	60.8
Jan-20	10.4	9.4	10.4	19.6
Feb-20	0.8	0.0	0.8	19.6
Mar-20	1.0	0.0	1.0	20.0

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



STATIONARY IC EMISSION TEST

Company: DOS CUADRAS OFFSHORE RESOURCES Platform: GINA
Date: May 1, 2019 Equipment: SEAKING CRANE
Quarter: 2Q 2019 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	11.42	11.70	13.28	12.13	
CO	16	12	11	13	
NOX	880	874	682	812	LIMIT
CO corrected to 15% O2	10	8	9	9	49
NOX corrected to 15% O2	548	561	528	545	

COMMENTS:

DCOR is responsible for communicating any changes to permit status / scope of work to CMS.



Field Test Data Transfer Log

15 - Minute- Raw Data Field Log

FACILITY NAME: DOS CUADRAS OFFSHORE RESOURCES LOCATION: Platform Gina

TEST: CO Emissions Monitoring UNIT: Seaking Crane

ANALYZER MODEL: TESTO T350 XL ANALYZER SERIAL NO: 1136757

#	Date	Time	% O2	ppm CO	ppm Total NOX
1	5/1/2019	1:35 PM	11.42	16	880
2	5/1/2019	1:36 PM	11.61	13	892
3	5/1/2019	1:37 PM	11.78	15	866
4	5/1/2019	1:38 PM	11.48	11	875
5	5/1/2019	1:39 PM	11.70	12	874
6	5/1/2019	1:40 PM	11.75	12	854
7	5/1/2019	1:41 PM	11.62	13	869
8	5/1/2019	1:42 PM	11.61	15	886
9	5/1/2019	1:43 PM	11.88	14	860
10	5/1/2019	1:44 PM	13.28	11	682
11	5/1/2019	1:45 PM	11.72	14	870
12	5/1/2019	1:46 PM	12.19	15	748
13	5/1/2019	1:47 PM	11.94	14	827
14	5/1/2019	1:48 PM	11.66	15	872
15	5/1/2019	1:49 PM	12.47	14	743
16					
17					
18					
19					
20					

NOTES:

	% O2	ppm CO	TOTAL NOX
RAW AVERAGES	11.87	13.60	839.87

PERMIT LIMITS:

CORRECTED DATA:

% O2	ppm CO	ppm TOTAL NOX
15	49	N/A
	8.89	548.99

CERTIFICATION: Based on the information and belief formed after reasonable inquiry, I certify that the statements and information contained in this report are true, accurate, and complete.

Test Conducted By: Jesse Vanhoy

Signature: [Signature]

Title: Field Tech

Date: 5/1/19

DCOR is responsible for communicating any changes to permit status / scope of work to CMS.



FIELD RUN TICKETS

COMPANY: DOS CUADRAS OFFSHORE RESOURCES
 RUN TYPE: COMBUSTION ANALYSIS
 UNIT ID: PLATFORM GINA - SEAKING CRANE
 DATE: 5/1/2019

gina

```
-----
Testo t350 XL
      Testo t350 XL
SN: 01136757 /USA
-----
NONAME
Settings:
Sample time: 15 min
Rinse time: 5 min
Data rate: 60 sec
Calc. Mean value: No
-----
from: 05/01/19 13:35:40
to: 05/01/19 13:50:54
-----
Number: 0015
Fueloil #2
-----
```

	Tf °F	O2 %	CO ppm
01	74.1	11.42	16
02	72.8	11.61	13
03	72.0	11.78	15
04	72.2	11.48	11
05	72.2	11.70	12
06	72.3	11.75	12
07	73.1	11.62	13
08	72.3	11.61	15
09	72.1	11.88	14
10	73.1	13.28	11
11	73.4	11.72	14
12	73.1	12.19	15
13	73.5	11.94	14
14	74.5	11.66	15
15	74.4	12.47	14

	NOx ppm	NO ppm	NO2 ppm
01	880	845	34.4
02	892	853	39.5
03	866	827	39.7
04	875	837	38.4
05	874	833	41.0
06	854	814	39.9
07	863	830	38.7
08	886	845	41.8
09	860	820	40.8
10	682	646	35.7
11	870	829	41.8
12	748	712	36.1
13	827	788	39.5
14	872	831	41.2
15	743	707	36.3




Condition
Monitoring
Services
Inc.

VISUAL EMISSION INSPECTION LOG

Dos Cuadras Offshore Resources

FACILITY: Platform Gina

DATE: 5/1/2019

Start Time	End Time	Equipment						VISIBLE EMISSION? (YES/NO)	 CALIFORNIA AIR RESOURCES BOARD Air Quality Training Program Awards This Certificate To Jesse VanHoy <small>For Completion of</small> MM106 - Visible Emissions Evaluation: Day Certification Student ID #: 26719
		Seaking Crane	PRODUCTION STDBY GEN	Flare					
1:00 PM	1:02 PM		X					NO	<i>JV</i>
1:15 PM	1:17 PM			X				NO	<i>JV</i>
1:30 PM	1:32 PM	X						NO	<i>JV</i>

Comments:

PLATFORM GINA

ENGINE MAINTENANCE

40 CFR Part 63, Subpart ZZZZ

Change Oil and Filter every 500 hours of operation or annually, whichever comes first

Inspect Air Cleaner every 1,000 hours of operation or annually, whichever comes first

Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first

Gina Crane

Oil / Filter Change	5/27/16	5/18/17	6/21/18	7/25/19
Air Cleaner Inspection	5/27/16	5/18/17	6/21/18	7/25/19
Belt Hose Inspection	5/27/16	5/18/17	6/21/18	7/25/19

Gina Emergency Generator

Oil / Filter Change	7/11/16	8/8/17	8/31/18	8/9/19
Air Cleaner Inspection	7/11/16	8/8/17	8/31/18	8/9/19
Belt Hose Inspection	7/11/16	8/8/17	8/31/18	8/9/19

Platforms Gina and Gilda Fuel Usage (in Gallons)

Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 75%
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
Jan-19	10,025	2,506	7,519
Feb-19	8,390	2,097	6,292
Mar-19	7,200	1,800	5,400
Apr-19	7,858	1,965	5,894
May-19	8,781	2,195	6,585
Jun-19	7,842	1,961	5,882
Jul-19	8,802	2,201	6,602
Aug-19	9,223	2,306	6,917
Sep-19	8,419	2,105	6,314
Oct-19	9,793	2,448	7,345
Nov-19	9,225	2,306	6,919
Dec-19	9,600	2,400	7,200
Jan-20	9,675	2,419	7,256
Feb-20	8,625	2,156	6,469
Mar-20	6,775	1,694	5,081
2019-20 Total	26,155	78,464	

Supply Boat Fuel Usage

	Gina		Gilda	
	Mains	Aux	Mains	Aux
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
Jan-19	2,087	87	6,260	261
Feb-19	1,470	61	4,410	184
Mar-19	360	15	1,080	45
Apr-19	0	0	0	0
May-19	0	0	0	0
Jun-19	311	7	612	21
Jul-19	74	4	223	11
Aug-19	1,126	49	3,378	146
Sep-19	1,983	87	5,949	260
Oct-19	2,030	88	6,090	263
Nov-19	2,286	95	762	32
Dec-19	0	0	0	0
Jan-20	403	17	1,211	50
Feb-20	0	0	0	0
Mar-20	120	5	360	15
2019-20 Total	8,333	351	18,585	799

	Rolling 12 Mo Total	
	Gina	Gilda
Apr-18	44,817	134,450
May-18	44,890	134,670
Jun-18	44,805	134,414
Jul-18	42,743	128,228
Aug-18	38,024	114,071
Sep-18	34,774	104,321
Oct-18	34,893	104,679
Nov-18	36,751	110,271
Dec-18	38,641	115,941
Jan-19	40,214	120,662
Feb-19	41,312	123,954
Mar-19	40,674	122,042
Apr-19	38,720	116,179
May-19	37,928	113,802
Jun-19	37,016	110,748
Jul-19	36,526	109,278
Aug-19	37,182	111,245
Sep-19	38,889	116,365
Oct-19	40,267	120,499
Nov-19	40,453	114,689
Dec-19	38,509	108,857
Jan-20	36,667	103,334
Feb-20	35,195	98,917
Mar-20	34,839	97,848

2019-20 Total 26,155 78,464

2019-20 Total 8,333 351 18,585 799

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	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
	TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY
Apr-18	0.285	5.421	0.257	0.168	2.575	0.856	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
Jan-19	0.256	4.865	0.231	0.151	2.311	0.768	14.596	0.693	0.452	6.933
Feb-19	0.263	4.997	0.237	0.155	2.374	0.789	14.995	0.712	0.465	7.122
Mar-19	0.259	4.920	0.234	0.153	2.337	0.777	14.763	0.701	0.458	7.012
Apr-19	0.246	4.684	0.222	0.145	2.225	0.739	14.054	0.667	0.436	6.675
May-19	0.241	4.588	0.218	0.142	2.179	0.724	13.767	0.654	0.427	6.539
Jun-19	0.236	4.478	0.213	0.139	2.127	0.705	13.397	0.636	0.415	6.363
Jul-19	0.232	4.419	0.210	0.137	2.099	0.696	13.219	0.628	0.410	6.279
Aug-19	0.237	4.498	0.214	0.139	2.136	0.708	13.457	0.639	0.417	6.392
Sep-19	0.248	4.704	0.223	0.146	2.234	0.741	14.077	0.669	0.436	6.686
Oct-19	0.256	4.871	0.231	0.151	2.314	0.767	14.577	0.692	0.452	6.923
Nov-19	0.257	4.894	0.232	0.152	2.324	0.730	13.874	0.659	0.430	6.589
Dec-19	0.245	4.658	0.221	0.144	2.213	0.693	13.168	0.625	0.408	6.254
Jan-20	0.233	4.436	0.211	0.138	2.107	0.658	12.500	0.594	0.388	5.937
Feb-20	0.224	4.258	0.202	0.132	2.022	0.630	11.966	0.568	0.371	5.683
Mar-20	0.222	4.214	0.200	0.131	2.002	0.623	11.837	0.562	0.367	5.622

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	
1.40	4.20	TPY
23.68	71.07	TPY
1.41	4.24	TPY
0.31	0.95	TPY
4.31	12.92	TPY

**Platforms Gina and Gilda Crew and Supply Boats
April 2019 - March 2020
Log of Boats Operating**

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

Crew Boats:

Capt T Le
Patrick
Luke
Nicolas L

Supply Boats:

Ryan T
Alan T
Kenneth Carl
Capt T Le

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

Nicolas L
3-600 BHP DD/MTU Series 60 Main Propulsion Engines
2- 50 HP 30kW Isuzu A-4JG1-PV-01 Generator Engines
Total HP 1900

Kenneth Carl
2- 671 HP Caterpillar C18 Main Engines,
2- 56 HP 30kW Yanmar 4TNV98 Generator Engines
Total HP 1454

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

**PLATFORM GINA
FLARE USAGE**

MONTH	Pilot SCF	Planned MCF	Unplanned MCF	12 Month 'Rolling' Total	
				Pilot MMSCF	Planned MMSCF
Apr-18		0	1449	0.00	0.141
May-18		1365	0	0.00	1.506
Jun-18		2189	412	0.00	3.695
Jul-18		15	775	0.00	3.709
Aug-18		90	119	0.00	3.799
Sep-18		8	201	0.00	3.807
Oct-18		0	10	0.00	3.807
Nov-18		0	0	0.00	3.807
Dec-18		0	0	0.00	3.807
Jan-19		0	582	0.00	3.792
Feb-19		0	583	0.00	3.792
Mar-19		0	0	0.00	3.667
Apr-19		0	0	0.00	3.667
May-19		1	64	0.00	2.303
Jun-19		0	54	0.00	0.114
Jul-19		0	198	0.00	0.099
Aug-19		0	110	0.00	0.009
Sep-19		0	241	0.00	0.001
Oct-19		0	575	0.00	0.001
Nov-19		0	1179	0.00	0.001
Dec-19		0	3106	0.00	0.001
Jan-20		0	362	0.00	0.001
Feb-20		0	1589	0.00	0.001
Mar-20		0	69	0.00	0.001

<i>Permit Limit Planned Flaring MMSCF/YR</i>	16.6
--	-------------

Notes: Flare has pilot with auto-ignitor.
Pilot volumes are included in total flare volume for each event.



Letter of Conformance

May 9, 2020

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to DCOR LLC April 1, 2019 to March 31, 2020.

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.

Marissa Mattern, MBA

A handwritten signature in black ink that reads 'Marissa Mattern'.

Senior Business Development Manager
SC Fuels
(805) 485-7855



Letter of Conformance

May 4, 2020

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

DCOR, LLC From 4/1/2019 - 3/31/2020

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

UNION MARINE STATION
125 HARBOR WAY #12
SANTA BARBARA, CA. 93109

Ph. 805-963-3808 FAX 963-2696

FROM: Bob Meyer PAGES: Cover + 1
TO: Christine DATE: 5-4-20

To whom it may concern,

All diesel fuel sold to DCOR
from 4/1/2019 thru 3/31/2020 was CARB approved
Ultra low sulfur diesel.

Sincerely,
Robert Meyer
owner - Santa Barbara Fuel Dock



American Research and Testing Inc.

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

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

NUMBER
207-11-095
November 14, 2007

SUBJECT: VOC of Chemco 33-S

REFERENCE:

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

SAMPLE DESCRIPTION:

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

REQUEST:

Determine the VOC of the sample.

METHOD:

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

RESULTS:

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

SIGNED FOR THE COMPANY

by

B. Belmont

B. Belmont
Senior Chemist

Rita R. Boggs, Ph.D.

Rita R. Boggs, Ph.D.
President

CHEMCO PRODUCTS COMPANY
6401 E. Alondra Blvd.

Supporting Documentation Rule 74.6

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

MATERIAL SAFETY DATA SHEET

SECTION I. IDENTIFICATION OF PRODUCT

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

SECTION II. HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

Name	CAS Number	PEL	TLV	%
2-Butoxyethanol	111-78-2	25ppm skin	25ppm skin	5
Sodium Metasilicate	6834-92-0	NE	NE	<5

SECTION III. PHYSICAL/CHEMICAL CHARACTERISTICS

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

SECTION IV. FIRE AND EXPLOSION HAZARD DATA

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

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

Unusual Fire and Explosion: None known

SECTION V. HEALTH HAZARD DATA

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

(Acute) Health Hazards:

Eyes: May cause irritation, redness and pain

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

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

Inhalation: May cause irritation of upper respiratory tract

(Chronic) Health Hazards: Prolonged or repeated skin contact may cause skin irritation. This product is not listed as or anticipated to be a potential carcinogen by NTP¹ or OSHA.

Signs and Symptoms of Exposure:

Eyes: Redness, irritation and blurry vision

Skin: May cause irritant reaction on prolonged contact

Ingestion: Abdominal discomfort, nausea, vomiting and diarrhea

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

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

Emergency First Aid Procedures:

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

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

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

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

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