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February 13, 2020

Mr. Keith Macias
Ventura County APCD
669 County Square Drive, Second Floor
Ventura, CA 93003

RE: Annual Compliance Certification Report
Platform Gilda, PTO 1492

Dear Mr. Macias:

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, 2019 through December 31, 2019.

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

Sincerely,

A handwritten signature in cursive script that reads "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**

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

2019

COMPLIANCE VERIFICATION REPORT

for the time period 1/1/19 – 12/31/19

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SECTION 1

Compliance Certification



Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM**

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


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

Confidentiality

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

Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p>  <p>Title: Robert L. Garcia, VP - Facilities & Process Engineering</p>	<p>Date:</p> <p>2.12.2020</p>
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<p>Time Period Covered by Compliance Certification</p> <p><u>01</u> / <u>01</u> / <u>2019</u> (MM/DD/YY) to <u>12</u> / <u>31</u> / <u>2019</u> (MM/DD/YY)</p>
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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
71.1N1	Rules 71.1.B.1.a, 74.10	<ul style="list-style-type: none"> • Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable • Verbal notice of maintenance activities • Rule 74.10 inspections • Annual compliance certification including verification that tanks are equipped with a vapor recovery system 	<ul style="list-style-type: none"> • Records of quarterly inspections and tank maintenance activities • Rule 74.10 records 	None	None	
71.1N6	Rules 71.1.B.3, 71.1.D.1.c, 74.10	<ul style="list-style-type: none"> • Annual compliance certification including verification of the integrity of the roof and pressure-vacuum relief valve • Rule 74.10 inspections 	<ul style="list-style-type: none"> • Records of number of days the tank has stored or held crude oil during the maintenance operation, location of the tank relative to a tank battery, and whether tank was connected to vapor recovery • Records to show integrity of roof and PV valves for tanks not permanently located at facility • Rule 74.10 records 	None	None	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.4 N1	Rules 71.4.B.2 and 74.10	<ul style="list-style-type: none"> Verbal notice of maintenance operations Rule 74.10 inspections Annual compliance certification including verifying the integrity of the cover 	<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	
74.15.1N1	Rule 74.15.1.B.1	<ul style="list-style-type: none"> Annual compliance certification Biennial Source Test (NO_x, CO) Annual NO_x and CO screening 	<ul style="list-style-type: none"> Records of source tests Records of NO_x and CO screenings Daily records of alternate fuel consumption 	None	<ul style="list-style-type: none"> NO_x-ARB Method 100 CO-ARB Method 100 	
ATCM Engine N3	ATCM for Stationary Compression Ignition Engines – OCS	<ul style="list-style-type: none"> Fuel type records Fuel use records 	<ul style="list-style-type: none"> Fuel type records Fuel use records 	None	None	Not federally enforceable
40CFR63ZZZ5	RICE MACT for non-emergency diesel engines > 300 HP & ≤ 500 HP, CO ppm limit	<ul style="list-style-type: none"> Initial CO source testing Maintain catalyst pressure / temperature Annual compliance certification 	<ul style="list-style-type: none"> Initial CO testing records 	As specified in Sections 63.6650(c)(1)-(6)	Portable analyzer, or EPA Methods 3, 4, and 10 or their designated alternatives	

1.c.2. Permit-Specific Conditions

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1492PC1 - Condition No. 1	Rule 29 General Recordkeeping	<ul style="list-style-type: none"> Annual compliance certification Monthly records of throughput and consumption Annual compliance certification 	<ul style="list-style-type: none"> Monthly records 	None	None	
PO1492PC1 - Condition No. 2	Rule 29 Maximum Number of Oil Wells	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO1492PC1 - Condition No. 3	Rule 26 Well Operations - BACT Requirements	<ul style="list-style-type: none"> Annual compliance certification 	None	None	None	
PO1492PC1 - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	<ul style="list-style-type: none"> Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery Annual compliance certification 	Fuel records	None	None	
PO1492PC1 - Condition No. 5	Rules 26 and 29 Crew Boat and Work Boat Fuel Use Limits	<ul style="list-style-type: none"> Rolling twelve month diesel fuel consumption for boats servicing Platforms Gina and Gilda 75% of usage for both platforms is the Gilda usage Annual compliance certification Information only 	<ul style="list-style-type: none"> Monthly records of diesel fuel consumption for both platforms; and 75% of total is for Gilda 	None	None	
PO1492PC1 - 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	
PO1492PC1 - 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	
PO1492PC1 - 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	
PO1492PC1 - Condition No. 9	Rules 23 and 29 Solvent Recordkeeping	<ul style="list-style-type: none"> Maintain a list of exempt solvents Annual compliance certification 	<ul style="list-style-type: none"> Maintain a list of exempt solvents 	None	None	
PO1492PC2 - Condition Nos. 1, 2, and 5	Rule 29 Flare Fuel Consumption	<ul style="list-style-type: none"> Fuel consumption Identify emergency vs. non-emergency usage Annual compliance certification 	<ul style="list-style-type: none"> Monthly records of fuel consumption 	None	None	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1492PC2 - Condition Nos. 3 and 4	Rules 71.1 Flare Ignition System Operation	<ul style="list-style-type: none"> Monthly tests of flare's ignition system Annual compliance certification 	<ul style="list-style-type: none"> Records of ignition system Maintenance records 	None	None	
PO1492PC3 - Condition Nos. 1, 4, and 5	Rule 74.9 and Section 61.4211(f)(2)(ii) of 40 CFR Part60, Subpart IIII	<ul style="list-style-type: none"> Annual compliance certification Monthly records of maintenance and testing hours Monthly records of DRP hours 	<ul style="list-style-type: none"> Monthly records of maintenance and testing hours Monthly records of DRP hours 	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"> 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	
PO1492PC3 - Condition No. 3	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

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 surps 	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 NO_x limit, or Maintain cost analysis documentation as verification to grid power exemption, if applicable Annual source tests (NO_x) or engine manufacturer certification 	<ul style="list-style-type: none"> Records of source tests or engine manufacturer certification Records of cost analysis documentation 	None	<ul style="list-style-type: none"> NO_x-ARB Method 100 	

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SECTION 2

Breakdowns, Deviations, and Excess Emissions

PTO 1492: PLATFORM GILDA

Reporting Period: January 1, 2019 through December 31, 2019

There were two (2) Breakdown Reports filed during this reporting period, as summarized on the following Annual Compliance Certification Deviation Summary Forms.

There were no Deviation Reports filed during this reporting period.

There were no Notices of Violation issued.

There were 0.33 lb Excess ROC Emissions.

Excess Emissions

Date	NOx (lbs)	ROC (lbs)	CO (lbs)	SOx (lbs)	PM (lbs)	PM10 (lbs)
1/21/2019	0	0.3	0	0	0	0
12/22/2019	0	0.03	0	0	0	0



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/19 to 12/31/19
(MM/DD/YY) (MM/DD/YY)

A. Attachment # or Permit Condition #: Attachment 71.1 C	B. Equipment description: Flare pilot	C. Deviation Period: Date & Time Begin <u>1/21/2019</u> <u>4:21 PM</u> End <u>1/21/2019</u> <u>5:46 PM</u> When Discovered: Date & Time <u>1/21/2019</u> <u>4:21 PM</u>
D. Parameters monitored: Gas directed to flare	E. Limit Produced gas is either directed to sales, vapor compressor, or flare	F. Actual: There were 0.30 lb excess ROC emissions while operators attempted to re-light the flare.
G. Probable Cause of Deviation Excessively high winds caused the flare pilot outage.		H. Corrective actions taken: Operators attempted to re-light the pilot, however, winds continued to interfere. Operators shut-off the pilot gas supply during the breakdown. Once winds had subsided enough, the flare pilot was able to be re-lit.

A. Attachment # or Permit Condition #: Attachment 71.1 C	B. Equipment description: Flare pilot	C. Deviation Period: Date & Time Begin <u>12/22/2019</u> <u>7:15 PM</u> End <u>12/22/2019</u> <u>7:20 PM</u> When Discovered: Date & Time <u>12/22/2019</u> <u>7:15 PM</u>
D. Parameters monitored: Gas directed to flare	E. Limit Produced gas is either directed to sales, vapor compressor, or flare	F. Actual: There were 0.03 lb excess ROC emissions while operators attempted to re-light the flare.
G. Probable Cause of Deviation A power flicker combined with high winds and rain caused the flare pilot outage.		H. Corrective actions taken: Operators attempted to re-light the pilot, however, winds continued to interfere. Operators shut-off the pilot gas supply during the breakdown. Once winds had subsided enough, the flare pilot was able to be re-lit.

A. Attachment # or Permit Condition #: 	B. Equipment description: 	C. Deviation Period: Date & Time Begin _____ End _____ When Discovered: Date & Time _____
D. Parameters monitored: 	E. Limit 	F. Actual:
G. Probable Cause of Deviation 		H. Corrective actions taken:

SECTION 3

Specific Applicable Requirements



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (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> 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 #: 71.N6</p>	<p>D. Frequency of monitoring: Daily, Quarterly</p>
<p>B. Description: Crude Oil Production and Separation, Compliance with Vapor Recovery</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Daily visual inspections verifying that the integrity of the roofs and pressure relief valves on the portable tanks. Quarterly inspections per Rule 74.10 EPA Method 21 ensuring that the hatches do not leak. The VRU is a closed system.</p>	<p>F. Currently in Compliance? (Y or N): <u> Y </u> G. Compliance Status? (C or I): <u> C </u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> N </u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 71.4N1</p>	<p>D. Frequency of monitoring: Quarterly</p>
<p>B. Description: Petroleum Sumps, Pits, Ponds and Well Cellar Compliance</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Quarterly inspections verifying the integrity of covers and/or roofs on sumps. Quarterly inspections per Rule 74.10 EPA Method 21 ensuring that the hatches do not leak.</p>	<p>F. Currently in Compliance? (Y or N): <u> Y </u> G. Compliance Status? (C or I): <u> C </u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> N </u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 74.9N7</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description: Stationary Internal Combustion Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Emergency standby stationary internal combustion engine only operated during an emergency or during maintenance operation of not more than 50 hours per calendar year.</p>	<p>F. Currently in Compliance? (Y or N): <u> Y </u> G. Compliance Status? (C or I): <u> C </u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> N </u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 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 #: 74.15.1N1</p>	<p>D. Frequency of monitoring: Daily records of fuel use; Biennial source test; Annual screening analysis.</p>
<p>B. Description: Boilers, Steam Generators, and Process Heaters</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable ARB Method 100 (NOx and CO)</p>
<p>C. Method of monitoring: Biennial emission source testing to ensure that the uniflux heater is operating within the normal parameters.</p>	<p>F. Currently in Compliance? (Y or N): <u> Y </u> G. Compliance Status? (C or I): <u> 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 SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant: NOx
C. Measured Emission Rate: 18.9 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: 1/15/2019

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant: CO
C. Measured Emission Rate: 239 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: 1/15/2019

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:			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 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

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

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

<p>A. Attachment # or Permit Condition #: 40 CFR 63 ZZZZ N5 (RICE MACT)</p>	<p>D. Frequency of monitoring: Daily, Annually</p>
<p>B. Description: NESHAP for Stationary RICE, Non-Emergency Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Minimize engine idle time. Comply with applicable emission standards. Use of nonroad diesel. Crankcase ventilation system. Recordkeeping.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

SECTION 4

Permit Specific Conditions



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 1</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Monthly Records of Throughput and Fuel Consumption: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Records maintained for platform throughput, equipment hours of operations, and fuel consumption.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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

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



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<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 4</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Maximum Sulfur Content of Diesel Fuel: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Records of sulfur content of diesel fuel maintained from fuel supplier.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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

<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 1 Item 6</p>	<p>D. Frequency of monitoring: Daily</p>
<p>B. Description: Two Crew Boats Shall not be used Simultaneously: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Log book maintained confirming crew boat activity including hours, days, and location of activity. Annual certification of compliance.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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

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

<p>A. Attachment # or Permit Condition #: PTO 1492 Permit Condition 1 Item 9</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: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 2 Section 1, 2, 5</p>	<p>D. Frequency of monitoring: Daily, Monthly</p>
<p>B. Description: Flare Fuel Consumption: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Monthly records of fuel consumption and flare activity monitored by individual fuel meters on the flare.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Flare Ignition System: Rule 71.1</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Flare has continuous pilot fed by sweet gas.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<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>



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Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (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></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 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></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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

SECTION 5

General Applicable Requirements



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

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

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



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Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (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: Laboratory analysis conducted annually of Non-PUC quality fuel gas; Determination of Sulfur in a gaseous matrix.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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



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Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (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: Rules 71.1C and 74.10: Crude Oil Production and Separation</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Produced gas must be controlled at all times and is verified through the daily visual and periodic maintenance of the produced gas collection system on Platform Gilda. Produced gas is either directed to sales, vapor compressor or flare. Compliance with Rule 74.10 ensures that various components are not leaking. The produced gas stream is a fully controlled closed loop system. There were two (2) breakdown reports filed.</p>	<p>F. Currently in Compliance? (Y or N): <u> Y </u> G. Compliance Status? (C or I): <u> I </u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> Y </u> *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 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 #: Rule 71.4.B3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Petroleum Sumps, Pits, and Well Cellars - Well Cellar Storage Prohibition</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: There are no well cellars on Platform Gilda. Offshore platforms are equipped with non-leaking stuffing boxes, oil is never stored in an open "pit" or cellar.</p>	<p>F. Currently in Compliance? (Y or N): <u> Y </u> 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: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (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: Fugitive Emissions - Oilfields</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Maintain a fugitive emission inspection and maintenance program that is consistent with the requirements of Rule 74.10.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></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 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></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: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (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 Gilda 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: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (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 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> <i>*If yes, attach Deviation Summary Form</i></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> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> <i>*If yes, attach Deviation Summary Form</i></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> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> <i>*If yes, attach Deviation Summary Form</i></p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

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

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

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 19 (MM/DD/YY) to 12 / 31 / 19 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Part 55</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Outer Continental Shelf Air Regulations</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Compliance with Permit to Operate 1492</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> 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 1492</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 1492</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 / 19 (MM/DD/YY) to 12 / 31 / 19 (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> 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 GILDA DIESEL CRANES FUEL USAGE

GILDA	NORTH CRANE 325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
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
Jan-19	90	609	2068
Feb-19	34	288	2347
Mar-19	13	86	2363
Apr-19	6	41	2285
May-19	9	65	2285
Jun-19	6	36	2155
Jul-19	12	79	2165
Aug-19	13	78	2176
Sep-19	7	37	2155
Oct-19	34	183	2214
Nov-19	52	237	1963
Dec-19	6	33	1771
North Crane permit limits	19,250 gal/yr		

GILDA	SOUTH CRANE 325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
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
Jan-19	131	812	3468
Feb-19	75	478	3803
Mar-19	23	140	3898
Apr-19	17	104	3887
May-19	16	100	3857
Jun-19	15	82	3873
Jul-19	21	115	3880
Aug-19	23	109	3820
Sep-19	11	20	3717
Oct-19	47	257	3665
Nov-19	46	248	3349
Dec-19	23	112	2576
South Crane permit limits	17,200 gal/yr		

STATIONARY IC EMISSION TEST

Company:	DOS CUADRAS OFFSHORE RESOURCES	Platform:	GILDA
Date:	May 1, 2019	Equipment:	NORTH 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	12.76	12.06	12.13	12.32	
CO	33	29	24	29	
NOX	622	711	704	679	LIMIT
CO corrected to 15% O2	24	19	16	20	49
NOX corrected to 15% O2	451	475	474	466	

COMMENTS: _____

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



STATIONARY IC EMISSION TEST

Company: DOS CUADRAS OFFSHORE RESOURCES Platform: GILDA
Date: May 1, 2019 Equipment: SOUTH CRANE
Quarter: 2Q 2019 Manufacturer: CATERPILLAR
Field Technician: JESSE VANHOY Model Number: 3406
Combustion Analyzer: TESTO 350 SN: 01136757 Fuel Type: #2 DIESEL

Table with 5 columns: Parameter, TEST 1, TEST 5, TEST 10, AVERAGE. Rows include RPM, O2, CO, NOX, CO corrected to 15% O2, and NOX corrected to 15% O2. A LIMIT column is present for NOX and CO corrected to 15% O2.

COMMENTS:

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

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

Gilda North Crane

Oil / Filter Change	8/18/2017	8/17/2018	3/6/2019
Air Cleaner Inspection	8/18/2017	8/17/2018	3/6/2019
Belt / Hose Inspection	8/18/2017	8/17/2018	3/6/2019

Gilda South Crane

Oil / Filter Change	1/20/2017	3/16/2018	8/29/2019
Air Cleaner Inspection	1/20/2017	3/16/2018	8/29/2019
Belt / Hose Inspection	1/20/2017	3/16/2018	8/29/2019

Gilda Emergency Generator

Oil / Filter Change	12/27/2017	12/12/2018	12/23/19
Air Cleaner Inspection	12/27/2017	12/12/2018	12/23/19
Belt / Hose Inspection	12/27/2017	12/12/2018	12/23/19

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

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-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
Jan-19	814	0.81	10.02
Feb-19	717	0.72	9.82
Mar-19	779	0.78	9.59
Apr-19	794	0.79	9.68
May-19	801	0.80	9.66
Jun-19	780	0.78	9.82
Jul-19	819	0.82	9.80
Aug-19	733	0.73	9.67
Sep-19	837	0.84	9.67
Oct-19	788	0.79	9.58
Nov-19	524	0.52	9.26
Dec-19	741	0.74	9.13

Permit limit, mmscf/yr		36.6

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

Days	2019												November MCF	December MCF		
	January MCF	February MCF	March MCF	April MCF	May MCF	June MCF	July MCF	August MCF	September MCF	October MCF	November MCF	December MCF				
1	29	29	24	26	25	25	27	27	27	27	27	27	27	27	27	27
2	24	26	25	26	25	25	25	25	25	25	25	25	27	27	27	27
3	24	26	24	26	25	25	26	26	26	26	26	26	27	27	27	27
4	24	26	24	27	25	25	26	26	26	26	26	26	27	27	27	27
5	26	27	24	28	25	25	27	27	27	27	27	27	27	27	27	27
6	25	26	24	27	25	25	26	26	26	26	26	26	27	27	27	27
7	26	26	24	27	26	26	27	27	27	27	27	27	27	27	27	27
8	25	27	25	27	25	25	27	27	27	27	27	27	27	27	27	27
9	25	27	25	27	26	26	27	27	27	27	27	27	27	27	27	27
10	25	27	25	27	26	26	27	27	27	26	26	27	27	27	27	27
11	26	27	25	26	27	27	27	27	27	27	27	27	27	27	27	27
12	26	25	26	26	27	26	26	26	26	27	27	27	27	27	27	27
13	26	29	26	26	26	26	26	26	26	27	27	27	27	27	27	27
14	26	26	27	26	26	26	26	26	26	27	27	27	27	27	27	27
15	26	26	27	26	27	26	26	26	26	27	27	27	27	27	27	27
16	26	26	26	26	25	26	26	26	26	27	27	27	27	27	27	27
17	25	25	26	26	25	26	26	26	26	27	27	27	27	27	27	27
18	25	24	26	27	25	26	27	27	27	27	27	27	27	27	27	27
19	27	24	26	28	25	26	28	28	28	27	27	27	27	27	27	27
20	28	24	26	27	27	27	27	27	27	25	25	27	27	27	27	27
21	28	25	26	26	27	26	26	26	26	27	26	27	27	27	27	27
22	28	24	26	27	27	26	27	27	27	26	26	26	26	26	26	26
23	27	24	26	28	27	28	28	28	28	27	25	29	29	29	29	29
24	27	24	24	27	26	26	27	27	27	26	26	26	26	26	26	26
25	28	24	24	26	26	26	26	26	26	26	26	26	26	26	26	26
26	27	24	24	25	26	26	25	25	25	26	26	26	26	26	26	26
27	27	25	24	25	26	26	25	25	25	26	26	26	26	26	26	26
28	27	24	24	26	26	26	26	26	26	26	26	26	26	26	26	26
29	28	0	25	26	25	26	26	26	26	25	26	26	26	26	26	26
30	27	0	25	26	27	26	26	26	26	27	27	27	27	27	27	27
31	26	0	26	0	25	25	0	0	0	0	0	0	0	0	0	0
TOTALS	814	717	779	794	801	780	819	733	837	788	524	741				

YTD 9,127 MCF

NOTES: Repairs to HTM starting 8/12 - Fuel gas regulator failed
 HTM Blower OOS 10/12
 Issues with HTM heat bundle starting 11/10 - throughout the month

AEROS ENVIRONMENTAL, INC.
Summary Of Results

DCOR LLC
Platform Gilda
4.0 MMBtu/hr Process Heater

Project 092-1713
January 15, 2019
Permit No. 01492

Pollutant	%	ppm	ppm @ 3% O ₂	lb/hr	lb/MMBtu	Permit Limits
NO_x		17.6	17.8	0.03	0.0215	30 ppm @ 3% O₂
		18.7	19.5	0.03	0.0236	
		18.6	19.4	0.03	0.0234	
Mean		18.3	18.9	0.03	0.0228	
CO		225	228	0.21	0.1676	400 ppm @ 3% O₂
		248	259	0.24	0.1905	
		244	255	0.23	0.1875	
Mean		239	248	0.23	0.1818	
O₂	3.21					
	3.77					
	3.79					
Mean	3.59					
Comments: _____						



Platform Gilda - PTO 01492

**619 BHP Caterpillar Diesel Engine
Monthly Summary**

2019

	Non-Emergency Use		Emergency Use
	Total	Maintenance and Testing Total	Total
	<i>hrs</i>	<i>hrs</i>	<i>hrs</i>
January	1.80	1.80	0.00
February	1.10	1.10	0.00
March	1.60	1.60	0.00
April	1.10	1.10	0.00
May	1.00	1.00	0.00
June	1.10	1.10	0.00
July	0.90	0.90	0.00
August	1.50	1.50	0.00
September	2.20	2.20	0.00
October	1.20	1.20	0.00
November	1.30	1.30	0.00
December	1.20	1.20	0.00
Total	16.00	16.00	0.00



**Condition
Monitoring
Services
Inc.**

VISUAL EMISSION INSPECTION LOG


Dos Cuadras Offshore Resources

FACILITY:

Platform Gilda

DATE:

5/1/2019

Start Time	End Time	Equipment					VISIBLE EMISSION? (YES/NO)	 Air Quality Training Program <i>Awards This Certificate To</i> Jesse VanHoy <small>For Completion of</small> MM106 - Visible Emissions Evaluation: Day Certification Student ID #: 26719
		North Crane	South Crane	PRODUCTION STDBY GEN	Flare	HTM		
9:00 AM	9:02 AM	X					NO	<i>JV</i>
9:35 AM	9:37 AM			X			NO	<i>JV</i>
9:45 AM	9:47 AM				X		NO	<i>JV</i>
10:15 AM	10:17 AM		X				NO	<i>JV</i>
10:45 AM	10:47 AM					X	NO	<i>JV</i>

Comments:

Platforms Gina and Gilda Fuel Usage (in Gallons)

Crew Boat Fuel Usage

	Total Fuel	Gina 25%	Gilda 75%
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
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
2018 Total	33,663	100,990	

Supply Boat Fuel Usage

	Gina		Gilda	
	Mains	Aux	Mains	Aux
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
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
2018 Total	4,778	199	14,353	599

	Rolling 12 Mo Total	
	Gina	Gilda
Jan-18	43,897	131,690
Feb-18	42,936	128,807
Mar-18	43,111	129,332
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

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	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
	TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY
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	0.856	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

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		
Plt Gina	Plt 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
November 2016 - June 2019
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
Luke
Patrick

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

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



Letter of Conformance

January 28, 2020

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to DCOR, LLC 1/1/19-12/31/19.

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

Terri Merritt

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

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



Letter of Conformance

February 3, 2020

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

DCOR, LLC From 1/1/2019-12/31/2019

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

February 4, 2020

Certificate of Compliance

This is to certify that the CARB ultra low sulfur diesel sold and delivered to DCOR in Ventura Harbor from 1/1/19 thru 12/31/19 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 2019**

FACILITY: DCOR, PLATFORM GILDA

PERMIT#: 1492

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 major/min	Repair Date	Post Repair Rate (ppmv)
No Reportable Leaks for this Quarter							
Inspected on 03/27/2019							

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
 Report for the 2nd Quarter of 2019

FACILITY: <u>DCOR, PLATFORM GILDA</u>	PERMIT#: <u>1492</u>																														
Method of Inspection: <u>TVA</u>	<table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th>Components</th> <th>Valves</th> <th>Others</th> <th>Pumps</th> <th>Compres.</th> <th>PRV's</th> </tr> </thead> <tbody> <tr> <td>Accessible Inspected:</td> <td>2,820</td> <td>18,267</td> <td>0</td> <td>3</td> <td>0</td> </tr> <tr> <td>Inacc. Insp. To Date:</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>Total # Leaking:</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>% Leaking:</td> <td>0.00%</td> <td>0.00%</td> <td>0.00%</td> <td>0.00%</td> <td>0.00%</td> </tr> </tbody> </table>	Components	Valves	Others	Pumps	Compres.	PRV's	Accessible Inspected:	2,820	18,267	0	3	0	Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A	Total # Leaking:	0	0	0	0	0	% Leaking:	0.00%	0.00%	0.00%	0.00%	0.00%
Components	Valves	Others	Pumps	Compres.	PRV's																										
Accessible Inspected:	2,820	18,267	0	3	0																										
Inacc. Insp. To Date:	N/A	N/A	N/A	N/A	N/A																										
Total # Leaking:	0	0	0	0	0																										
% Leaking:	0.00%	0.00%	0.00%	0.00%	0.00%																										

Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
No Reportable Leaks for this Quarter							
Inspected on 06/18/2019							

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
 Report for the 3rd Quarter of 2019

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:	0	3	0	0	0	
	% Leaking:	0.00%	0.02%	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)
Reducer	Well S - 24 (Well Bay 3)	07/31/2019 9:20AM	07/31/2019 9:20AM	10000 PPM	n/a	08/06/2019 5:35PM	0 PPM
Hose Connection	Well S - 26 (Well Bay 3)	07/31/2019 9:40AM	07/31/2019 9:40AM	8960 PPM	n/a	08/01/2019 10:00AM	10.86 PPM
Hatch	T - 01 (Sub Deck)	08/01/2019 9:40AM	08/01/2019 9:40AM	9800 PPM	n/a	08/14/2019 10:40AM	0 PPM

VENTURA COUNTY APCD
RULE 74.10
COMPONENT LEAK REPORT
Report for the 4th Quarter of 2019

FACILITY: DCOR, PLATFORM GILDA

PERMIT#: 1492

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

Component Description	Operating Unit / Location	Detection Date/Time	Inspection Date/Time	Gas Leak (ppmv)	Liquid Leak major/minor	Repair Date	Post Repair Rate (ppmv)
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No Reportable Leaks for this Quarter

Inspected on 11/13/2019

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

	Pilot	Planned	Unplanned	12 Month 'Rolling' Total	
	MCF	MCF	MCF	Pilot	Planned
				MMCF	MMCF
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
Jan-19	62	0	200	0.73	8.25
Feb-19	56	0	505	0.73	8.25
Mar-19	62	0	15	0.73	7.89
Apr-19	60	0	24	0.73	7.89
May-19	62	0	211	0.73	5.61
Jun-19	60	0	360	0.73	0.12
Jul-19	62	185	46	0.73	0.28
Aug-19	62	0	1082	0.73	0.28
Sep-19	60	0	244	0.73	0.19
Oct-19	62	0	1089	0.73	0.19
Nov-19	60	0	6166	0.73	0.19
Dec-19	62	0	4563	0.73	0.19

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

FLARING AT GILDA

Dec-19

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	TOTAL GAS FLARED AT GILDA (Gilda Flare Chart 3701)	Entered By	REASON FOR FLARING
12/3/19	10:00	16:45	0	Unplanned	120	RT	Pipeline shut-in at MOSF
12/5/19	12:20	15:00	0	Unplanned	47	DD	Pipeline shut-in at MOSF
12/5/19	19:45	0:00	3	Unplanned	122	JW	Amine plant upset
12/6/19	0:00	0:00	91	Unplanned	418	JW	MOSF S/I due to High O2
12/7/19	0:00	19:30	16	Unplanned	326	JW	MOSF S/I due to High O2 - GC-#3 Bad Lube Oil Pump
12/7/19	19:40	0:00	16	Unplanned	73	JW	GC-#3 Bad Lube Oil Pump
12/8/19	0:00	0:00	95	Unplanned	363	JW	Pipeline shut-in at MOSF
12/9/19	0:00	18:40	135	Unplanned	297	JW	Pipeline shut-in at MOSF
12/9/19	18:45	0:00	135	Unplanned	85	JW	Pipeline shut-in at MOSF
12/10/19	0:00	0:00	110	Unplanned	382	JW	Pipeline shut-in at MOSF
12/11/19	0:00	17:35	82	Unplanned	282	JW	Pipeline shut-in at MOSF
12/11/19	17:40	0:00	82	Unplanned	102	JW	Pipeline shut-in at MOSF
12/12/2019	0:00	0:00	75	Unplanned	384	AD	G.C. #3 Bad Lube Oil Pump
12/13/2019	0:00	16:20	82	Unplanned	276	AD	Flaring Amine Plant
12/13/2019	18:00	0:00	90	Unplanned	146	AD	Flaring Amine Plant
12/14/2019	0:00	0:00	65	Unplanned	420	AD	Flaring Amine Plant
12/15/2019	0:00	16:30	83	Unplanned	284	RT	Flaring Amine Plant
12/22/2019	1:45	6:00	42	Unplanned	148	DD	Flaring Amine Plant
12/22/2019	19:13	19:43	0	Unplanned	17	DD	Flaring Amine Plant
12/22/2019	22:30	0:00	8	Unplanned	52	DD	Flaring Amine Plant
12/23/2019	0:00	12:30	4	Unplanned	219	JR	Flaring Amine Plant
					4563		