



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

May 13, 2021

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, 2020 through March 31, 2021.

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**

**2020 ANNUAL COMPLIANCE**

**CERTIFICATION REPORT**

**For the time period 4/1/20 – 3/31/21**

**PLATFORM GINA**

**PART 70**

**PERMIT TO OPERATE 1491**

**Submitted to:**

**Ventura County Air Pollution Control District**

**669 County Square Drive, Second Floor**

**Ventura, CA 93003**

**Submitted by:**

**DCOR, LLC**

**290 Maple Court, Suite 290**

**Ventura, CA 93003**

**DCOR, LLC – PLATFORM GINA – PTO 1491**

**2020**

**COMPLIANCE VERIFICATION REPORT**

**for the time period 4/1/20 – 3/31/21**

**TABLE OF CONTENTS**

1. Compliance Certification
2. Breakdowns, Deviations, NOV's, NTC's, and Excess Emissions
3. Specific Applicable Requirements
4. Permit Specific Conditions
5. General Applicable Requirements
6. General Requirements for Short-Term Activities
  - General Permit Conditions
  - Miscellaneous Federal Program Conditions
7. Supporting Documentation



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:

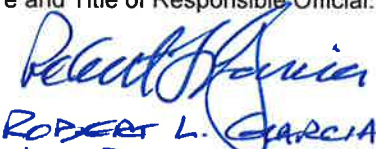
Mr. Gerardo Rios, Chief  
Permits Office (AIR-3)  
Office of Air Division  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

### 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: 5.13.2021
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Time Period Covered by Compliance Certification 04/01/2020 to 03/31/2021
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## **SECTION 1**

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### **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
71.1N1	Rules 71.1.B.1 a, 74.10	<ul style="list-style-type: none"> <li>•Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable</li> <li>•Verbal notice of maintenance activities</li> <li>•Rule 74.10 inspections</li> <li>•Annual compliance certification including verification that tanks are equipped with a vapor recovery system</li> </ul>	<ul style="list-style-type: none"> <li>•Records of quarterly inspections and tank maintenance activities</li> <li>•Rule 74.10 records</li> </ul>	None	None	
71.1N6	Rules 71.1.B.3, 71.1.D.1.c, 74.10	<ul style="list-style-type: none"> <li>•Annual compliance certification including verification of the integrity of the roof and pressure-vacuum relief valve</li> <li>•Rule 74.10 inspections</li> </ul>	<ul style="list-style-type: none"> <li>•Records of number of days the tank has stored or held crude oil during the maintenance operation, location of the tank relative to a tank battery, and whether tank was connected to vapor recovery</li> <li>•Records to show integrity of roof and PV valves for tanks not permanently located at facility</li> <li>•Rule 74.10 records</li> </ul>	None	None	

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

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

### 1.c.2. Permit-Specific Conditions

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1491PCI - Condition No. 1	Rule 29 General Recordkeeping	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Monthly records of throughput and consumption</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records</li> </ul>	None	None	
PO1491PCI - Condition No. 2	Rule 29 Maximum Number of Oil Wells	<ul style="list-style-type: none"> <li>Annual compliance certification</li> </ul>	None	None	None	
PO1491PCI - Condition No. 3	Rule 26 BACT Well	<ul style="list-style-type: none"> <li>Annual compliance certification</li> </ul>	None	None	None	
PO1491PCI - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	<ul style="list-style-type: none"> <li>Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Fuel records</li> </ul>	None	None	
PO1491PCI - Condition No. 5	Rules 26 and 29 Crew Boat and Work Boat Emission Limits	<ul style="list-style-type: none"> <li>Rolling twelve month diesel fuel consumption for boats servicing Platforms Gina and Gilda</li> <li>25% of usage for both platforms is the Gina usage.</li> <li>Annual compliance certification</li> <li>Information only</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of diesel fuel consumption</li> <li>Monthly calculations of emissions (boats)</li> </ul>	None	None	
PO01491PCI- Condition No. 6	Boat engine permitted emissions information	<ul style="list-style-type: none"> <li>Information only</li> </ul>	<ul style="list-style-type: none"> <li>Information only</li> </ul>	None	None	
PO1491PCI - Condition No. 7	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of crew boat operation</li> <li>Maintain a log of boats and engines</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of crew boat operation</li> <li>Maintain a log of crew boats and engines</li> </ul>	None	None	
PO1491PCI - Condition No. 8	Rule 29 Two Work Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of work boat operation</li> <li>Maintain a log of boats and engines</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of work boat operation</li> <li>Maintain a log of work boats and engines</li> </ul>	None	None	
PO1491PCI - Condition No. 9	Rules 23 and 29 Solvent Recordkeeping	<ul style="list-style-type: none"> <li>Maintain a list of exempt solvents</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a list of exempt solvents</li> </ul>	None	None	
PO1491PC2 - Condition Nos. 1, 2, and 5	Rule 29 Flare Fuel Consumption	<ul style="list-style-type: none"> <li>Fuel consumption</li> <li>Identify emergency vs. non-emergency usage</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of fuel consumption</li> </ul>	None	None	
PO1491PC2 - Condition Nos. 3 and 4	Rules 71.1 Flare Ignition System Operation	<ul style="list-style-type: none"> <li>Monthly tests of flare's ignition system</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Records of ignition system</li> <li>Maintenance records</li> </ul>	None	None	



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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO149IPC3 - Condition No. 1	Rules 26 and 74.9 200 hours per year backup utility generator operation	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Monthly records of backup utility generator hours of operation</li> </ul>	<ul style="list-style-type: none"> <li>•Hours of operation log (non-resettable meter) differentiating non-emergency use and emergency use</li> <li>•Monthly and twelve month rolling records of hours of operation</li> </ul>	None	None	
PO149IPC3 - Condition Nos. 2 and 3	Rule 74.9 200 hours per year / emergency use exemptions	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Recordkeeping</li> </ul>	<ul style="list-style-type: none"> <li>•Hours of operation log (non-resettable meter)</li> <li>•Monthly and twelve month rolling records of hours of operation</li> </ul>	None	None	

### 1.c.3. General Applicable Requirements

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

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

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

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

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

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

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

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

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

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## **SECTION 2**

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

**PTO 1491: PLATFORM GINA**

Reporting Period: April 1, 2020 through March 31, 2021

There were three (3) Breakdown Reports filed during this reporting period, as summarized on the following Annual Compliance Deviation Summary Forms.

There was 0.001 lbs ROC excess emissions during this reporting period.

**Excess Emissions**

Date	NOx (lbs)	ROC (lbs)	CO (lbs)	SOx (lbs)	PM (lbs)	PM10 (lbs)
10/4/2020	0	0.001	0	0	0	0



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04/01/20 to 03/31/21  
(MM/DD/YY) (MM/DD/YY)

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>10/4/2020</u> <u>4:40 PM</u></p> <p>End <u>10/4/2020</u> <u>5:10 PM</u></p> <p>When Discovered: Date &amp; Time</p> <p><u>10/4/2020</u> <u>4:40 PM</u></p>
<p>D. Parameters monitored:</p> <p>Vapor recovery compressor operations</p>	<p>E. Limit</p> <p>Produced gas is either directed to sales, vapor compressor, or flare.</p>	<p>F. Actual:</p> <p>Breathing losses from various sized crude oil, wash, and skim tanks, ans sump totals 0.001 pound of ROC.</p>
<p>G. Probable Cause of Deviation</p> <p>Vapor recovery compressor belt was found to be defective.</p>		<p>H. Corrective actions taken:</p> <p>The defective vapor recovery compressor belt was replaced.</p>

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>1/24/2021</u> <u>10:50 AM</u></p> <p>End <u>1/24/2021</u> <u>10:51 AM</u></p> <p>When Discovered: Date &amp; Time</p> <p><u>1/24/2021</u> <u>10:50 AM</u></p>
<p>D. Parameters monitored:</p> <p>Vapor recovery compressor operations</p>	<p>E. Limit</p> <p>Produced gas is either directed to sales, vapor compressor, or flare.</p>	<p>F. Actual:</p> <p>No excess emissions as effective vapor recovery was not lost due to the short time-frame the VRU compressor was down (&lt;1 min.)</p>
<p>G. Probable Cause of Deviation</p> <p>Faulty H2S sensor, however during this first of two VRU outages there was no alarm that the H2S sensor was bad.</p>		<p>H. Corrective actions taken:</p> <p>The VRU compressor was started back up within a minute.</p>

<p>A. Attachment # or Permit Condition #:</p> <p><b>Attachment 71.1.C</b></p>	<p>B. Equipment description:</p> <p><b>Vapor Recovery Compressor</b></p>	<p>C. Deviation Period: Date &amp; Time</p> <p>Begin <u>1/24/2021</u> <u>12:30 PM</u></p> <p>End <u>1/24/2021</u> <u>12:31PM</u></p> <p>When Discovered: Date &amp; Time</p> <p><u>1/24/2021</u> <u>12:30 PM</u></p>
<p>D. Parameters monitored:</p> <p>Vapor recovery compressor operations</p>	<p>E. Limit</p> <p>Produced gas is either directed to sales, vapor compressor, or flare.</p>	<p>F. Actual:</p> <p>No excess emissions as effective vapor recovery was not lost due to the short time-frame the VRU compressor was down (&lt;1 min.)</p>
<p>G. Probable Cause of Deviation</p> <p>Faulty H2S sensor.</p>		<p>H. Corrective actions taken:</p> <p>Faulty H2S sensor and battery was replaced and the VRU compressor was stated back up within one minute of shut-down.</p>



## **SECTION 3**

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### **Specific Applicable Requirements**



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (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 #: 71.1N6</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> 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: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>74.9N9</b></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 #: <b>ATCM Engine N3</b></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 / 20 (MM/DD/YY) to 03 / 31 / 21 (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**

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### **Permit Specific Conditions**



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 1</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Monthly Records of Throughput and Fuel Consumption: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring:  Records maintained for platform throughput, equipment hours of operations, and fuel consumption.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 2</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Maximum Number of Oil Wells: Rule 29</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring:  The platform is permitted with the maximum number of wells, this number cannot be exceeded. This platform has 8 slots with oil well completions. Annual Compliance Certification.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Well Operations: BACT Requirements: Rule 26</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring:  Annual Compliance Certification verifying that the well H-2 is free flowing, have operated on gas lift, or with electric motor driven artificial lift equipment.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (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></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PTO 1491 Permit Condition 1 Item 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></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 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></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 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

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

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

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





Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (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>  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 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>  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 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

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

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

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

## **SECTION 5**

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### **General Applicable Requirements**



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 50</b></p>	<p>D. Frequency of monitoring: <b>Annual Visible Emission Survey</b></p>
<p>B. Description:  <b>Visible Emissions - Opacity</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>N/A</b></p>
<p>C. Method of monitoring:  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></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Rule 54.B.1</b></p>	<p>D. Frequency of monitoring: <b>Daily</b></p>
<p>B. Description:  <b>Sulfur Compounds - SOx at Point of Discharge</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Rule 54.B.2</b></p>	<p>D. Frequency of monitoring: <b>Daily</b></p>
<p>B. Description:  <b>Sulfur Compounds - SOx at or Beyond Property Line</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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></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 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Attachment 71.1.C</b></p>	<p>D. Frequency of monitoring: <b>Daily, Quarterly, Annually</b></p>
<p>B. Description:  <b>Crude Oil Production and Separation</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>N/A</b></p>
<p>C. Method of monitoring: <b>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</b></p>	<p>F. Currently in Compliance? (Y or N): <b>Y</b>  G. Compliance Status? (C or I): <b>I</b>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <b>Y</b>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Rule 71.4.B1</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Petroleum Sumps, Pits, and Well Cellars - First Stage Sump Prohibition</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>N/A</b></p>
<p>C. Method of monitoring:  <b>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.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>Rule 71.4.B3</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Petroleum Sumps, Pits, and Well Cellars - Well Cellar Storage Prohibition</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>N/A</b></p>
<p>C. Method of monitoring:  <b>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.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Rule 74.6</b></p>	<p>D. Frequency of monitoring: <b>Monthly</b></p>
<p>B. Description:  <b>Surface Cleaning and Degreasing</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>N/A</b></p>
<p>C. Method of monitoring: <b>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.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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

<p>A. Attachment # or Permit Condition #: <b>Rule 74.11.1</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Large Water Heaters and Small Boilers</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>N/A</b></p>
<p>C. Method of monitoring:  <b>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.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

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

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

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



## **SECTION 6**

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (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></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>Part 70 General</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>General Part 70 Permit Conditions</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>N/A</b></p>
<p>C. Method of monitoring:  <b>Compliance with Permit to Operate 1491</b></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 20 (MM/DD/YY) to 03 / 31 / 21 (MM/DD/YY)

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

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

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

## **SECTION 7**

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### **Supporting Documentation**

**PLATFORM GINA DIESEL CRANE FUEL USAGE**

GINA	CRANE		
	325 bhp CAT 3406B		
	Hrs.	Gal.	12 Mo. Rolling Total Gal
Apr-19	3	21	624
May-19	4	26	575
Jun-19	6	35	557
Jul-19	4	24	506
Aug-19	6	35	495
Sep-19	3	15	464
Oct-19	5	27	440
Nov-19	9	54	423
Dec-19	5	62	433
Jan-20	12	40	426
Feb-20	7	37	413
Mar-20	5	20	396
Apr-20	3	20	395
May-20	5	25	394
Jun-20	4	35	393
Jul-20	7	46	415
Aug-20	4	18	398
Sep-20	5	32	416
Oct-20	6	33	422
Nov-20	1	59	426
Dec-20	1	7	371
Jan-21	8	39	369
Feb-21	37	222	554
Mar-21	9	61	596
Crane permit limits		2,870 gal/yr	



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

	<b>HOURS</b>		<b>HOURS</b>	
	<b>Non-Emergency</b>	<b>Emergency</b>	<b>Monthly Total</b>	<b>12-Mo Rolling Total</b>
<b>Jan-20</b>	1.0	9.4	10.4	32.6
<b>Feb-20</b>	0.8	0.0	0.8	30.7
<b>Mar-20</b>	1.0	0.0	1.0	31.1
<b>Apr-20</b>	1.0	0.0	1.0	31.4
<b>May-20</b>	0.9	0.0	0.9	30.0
<b>Jun-20</b>	0.9	0.0	0.9	20.4
<b>Jul-20</b>	0.9	0.0	0.9	20.5
<b>Aug-20</b>	1.0	0.0	1.0	20.5
<b>Sep-20</b>	0.8	0.0	0.8	20.6
<b>Oct-20</b>	1.0	0.0	1.0	20.6
<b>Nov-20</b>	1.0	0.0	1.0	20.6
<b>Dec-20</b>	1.1	0.0	1.1	20.8
<b>Jan-21</b>	1.0	8.8	9.8	20.2
<b>Feb-21</b>	1.2	0.0	1.2	20.6
<b>Mar-21</b>	0.4	0.0	0.4	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 27, 2020	Equipment:	SEAKING CRANE
Quarter:	2Q 2020	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	1785	1785	1785	1785	
O2	11.94	11.37	11.92	11.74	
CO	50	38	42	43	
NOX	969	984	913	955	LIMIT
CO corrected to 15% O2	33	24	28	28	49
NOX corrected to 15% O2	638	609	600	616	

COMMENTS:

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

```

-----
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: 05/27/20 14:44:35
to: 05/27/20 14:59:55
-----
Number: 0015
Fueloil #2
-----
  
```

```

          Tf      O2      CO
          °F      %      ppm
01  74.4  11.94  50
02  73.7  10.78  41
03  73.7  11.21  48
04  73.7  13.01  44
05  73.4  11.37  38
06  73.4  11.03  35
07  73.4  10.01  32
08  74.0  10.47  41
09  73.8  10.68  40
10  73.7  11.92  42
11  73.7  11.08  35
12  74.1  10.94  28
13  74.0  10.60  25
14  73.8  10.61  29
15  74.0  11.21  27
  
```

```

          NOx      NO      NO2
          ppm      ppm      ppm
01  969  936  33.6
02  1006  971  35.4
03  1004  966  38.2
04  802  768  34.5
05  984  945  38.6
06  1007  969  38.8
07  1046  1008  37.9
08  1045  1004  40.6
09  1039  998  40.5
10  913  875  38.1
11  1054  1012  41.8
12  1040  999  41.0
13  1057  1015  42.0
14  1034  992  41.2
15  1015  973  42.5
  
```



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	5/27/2020	2:44 PM	11.94	50	969.0
2	5/27/2020	2:45 PM	10.78	41	1006.0
3	5/27/2020	2:46 PM	11.21	48	1004.0
4	5/27/2020	2:47 PM	13.01	44	802.0
5	5/27/2020	2:48 PM	11.37	38	984.0
6	5/27/2020	2:49 PM	11.03	35	1007.0
7	5/27/2020	2:50 PM	10.01	32	1046.0
8	5/27/2020	2:51 PM	10.47	41	1045.0
9	5/27/2020	2:52 PM	10.68	40	1039.0
10	5/27/2020	2:53 PM	11.92	42	913.0
11	5/27/2020	2:54 PM	11.08	35	1054.0
12	5/27/2020	2:55 PM	10.94	28	1040.0
13	5/27/2020	2:56 PM	10.60	25	1057.0
14	5/27/2020	2:57 PM	10.61	29	1034.0
15	5/27/2020	2:58 PM	11.21	27	1015.0
16					
17					
18					
19					
20					

NOTES:

	% O2	ppm CO	TOTAL NOX
RAW AVERAGES	11.12	37.00	1001.00

	% O2	ppm CO	ppm TOTAL NOX
PERMIT LIMITS:	15	49	N/A
CORRECTED DATA:		22.33	604.12

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.

Jesse Vanhoy  
Test Conducted By

*[Signature]*  
Signature

Field Technician  
Title

5/27/2020  
Date

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




**Condition  
Monitoring  
Services  
Inc.**

**VISUAL EMISSION INSPECTION LOG**  
Dos Cuadras Offshore Resources

FACILITY: Platform Gina

DATE: 5/27/2020

Start Time	End Time	Equipment						VISIBLE EMISSION? (YES/NO)	 Air Quality Training Program Awards This Certificate To <b>Jesse VanHoy</b> <small>For Completion of</small> <b>MM108 - Visible Emissions Evaluation: Day Certification</b>  <b>Student ID #: 26719</b>
		Seaking Crane	PRODUCTION STDBY GEN	Flare					
2:45 PM	2:47 PM	X						NO	<i>QV</i>
3:20 PM	3:22 PM			X				NO	<i>QV</i>
3:30 PM	3:32 PM		X					NO	<i>QV</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	5/18/17	6/21/18	7/25/19	6/22/20
Air Cleaner Inspection	5/18/17	6/21/18	7/25/19	6/22/20
Belt Hose Inspection	5/18/17	6/21/18	7/25/19	6/22/20

**Gina Emergency Generator**

Oil / Filter Change	8/8/17	8/31/18	8/9/19	6/25/20
Air Cleaner Inspection	8/8/17	8/31/18	8/9/19	6/25/20
Belt Hose Inspection	8/8/17	8/31/18	8/9/19	6/25/20

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

**Crew Boat Fuel Usage**

	Total Fuel	Gina 25%	Gilda 75%
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	9,585	2,396	7,189
Feb-20	8,556	2,139	6,417
Mar-20	6,788	1,697	5,091
Apr-20	2,875	719	2,156
May-20	2,700	675	2,025
Jun-20	2,800	700	2,100
Jul-20	4,943	1,236	3,708
Aug-20	3,883	971	2,912
Sep-20	3,422	856	2,567
Oct-20	3,739	935	2,805
Nov-20	3,249	812	2,437
Dec-20	4,004	1,001	3,003
Jan-21	3,263	816	2,447
Feb-21	5,179	1,295	3,884
Mar-21	4,193	1,048	3,145
<b>Apr 20 -Mar 21 Total</b>	<b>11,063</b>	<b>33,189</b>	

**Supply Boat Fuel Usage**

	Gina		Gilda	
	Mains	Aux	Mains	Aux
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	347	87	1,041	260
Feb-20	0	0	0	0
Mar-20	34	2	11	1
Apr-20	77	4	231	12
May-20	127	7	381	20
Jun-20	68	4	204	11
Jul-20	18	1	53	3
Aug-20	37	2	112	6
Sep-20	25	1	75	4
Oct-20	0	0	0	0
Nov-20	0	0	0	0
Dec-20	156	8	467	23
Jan-21	12	1	36	2
Feb-21	529	117	1,587	352
Mar-21	214	47	641	142
<b>Apr 20 -Mar 21 Total</b>	<b>1,262</b>	<b>192</b>	<b>3,786</b>	<b>575</b>

	Rolling 12 Mo Total	
	Gina	Gilda
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	36,659	103,308
Feb-20	35,169	98,839
Mar-20	34,727	97,417
Apr-20	33,562	93,922
May-20	32,176	89,762
Jun-20	30,669	85,563
Jul-20	29,645	82,490
Aug-20	27,174	75,078
Sep-20	23,882	65,200
Oct-20	20,250	54,307
Nov-20	16,375	49,031
Dec-20	15,140	45,324
Jan-21	13,138	39,319
Feb-21	12,940	38,724
Mar-21	12,517	37,550

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
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	4.435	0.211	0.137	2.106	0.658	12.497	0.594	0.387	5.936
Feb-20	0.224	4.254	0.202	0.132	2.021	0.629	11.957	0.568	0.371	5.679
Mar-20	0.221	4.201	0.200	0.130	1.995	0.620	11.785	0.560	0.365	5.597
Apr-20	0.214	4.060	0.193	0.126	1.928	0.598	11.362	0.540	0.352	5.396
May-20	0.205	3.892	0.185	0.121	1.849	0.571	10.859	0.516	0.337	5.157
Jun-20	0.195	3.710	0.176	0.115	1.762	0.545	10.351	0.492	0.321	4.916
Jul-20	0.189	3.586	0.170	0.111	1.703	0.525	9.979	0.474	0.309	4.739
Aug-20	0.173	3.287	0.156	0.102	1.561	0.478	9.082	0.431	0.282	4.314
Sep-20	0.152	2.889	0.137	0.090	1.372	0.415	7.887	0.375	0.245	3.746
Oct-20	0.129	2.450	0.116	0.076	1.163	0.346	6.569	0.312	0.204	3.120
Nov-20	0.104	1.981	0.094	0.061	0.941	0.312	5.931	0.282	0.184	2.817
Dec-20	0.096	1.831	0.087	0.057	0.870	0.288	5.483	0.260	0.170	2.604
Jan-21	0.084	1.589	0.075	0.049	0.755	0.250	4.756	0.226	0.147	2.259
Feb-21	0.082	1.565	0.074	0.049	0.743	0.246	4.684	0.222	0.145	2.225
Mar-21	0.080	1.514	0.072	0.047	0.719	0.239	4.542	0.216	0.141	2.157

Tier 0 Emission Factors	
ROC	33.15 lb/Mgal
NOx	561.00 lb/Mgal
PM	33.50 lb/Mgal
SOx	7.50 lb/Mgal
CO	102.00 lb/Mgal

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

Permitted Emissions		
Pit Gina	Pit Gilda	
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 2020 - March 2021**

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

**Crew Boats:**

Capt T Le  
Patrick  
Alan T  
Luke

**Supply Boats:**

Alan T  
Patrick  
Nicholas L  
Adele Elise

**Boat Engines:**

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

Luke

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

Nicholas L

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



**PLATFORM GINA  
FLARE USAGE**

MONTH	Pilot	Planned	Unplanned	12 Month 'Rolling' Total	
	SCF	MCF	MCF	Pilot MMSCF	Planned MMSCF
Apr-19		0	0	0.00	0.147
May-19		1	64	0.00	0.148
Jun-19		0	54	0.00	0.147
Jul-19		0	198	0.00	0.001
Aug-19		0	110	0.00	0.001
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
Apr-20		0	3396	0.00	0.001
May-20		0	558	0.00	0.000
Jun-20		0	55	0.00	0.000
Jul-20		1	7	0.00	0.001
Aug-20		22	148	0.00	0.023
Sep-20		0	296	0.00	0.023
Oct-20		0	1488	0.00	0.023
Nov-20		64	93	0.00	0.087
Dec-20		0	272	0.00	0.087
Jan-21		0	102	0.00	0.087
Feb-21		0	596	0.00	0.087
Mar-21		0	761	0.00	0.087

<i>Permit Limit Planned Flaring MMSCF/YR</i>	<b>16.6</b>
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Notes: Flare has pilot with auto-ignitor.  
Pilot volumes are included in total flare volume for each event.



**Flare Log**  
**Gina**

Prod Date	Flare Start	Flare Stop	Planned	Unplanned	H2S	Notes
4/2/2020	3:55	05:20	0	50	1	MOSF GAS LINE VALVE SHUT IN
4/11/2020	21:40	21:55	0	8	1	MOSF GAS LINE VALVE SHUT IN
4/13/2020	8:45	12:30	0	132	1	MOSF GAS LINE VALVE SHUT IN
4/13/2020	13:00	18:15	0	185	1	MOSF GAS LINE VALVE SHUT IN
4/13/2020	19:00	00:00	0	176	1	MOSF GAS LINE VALVE SHUT IN
4/14/2020	0:00	07:00	0	240	1	MOSF GAS LINE VALVE SHUT IN
4/15/2020	23:30	00:00	0	25	1	MOSF GAS LINE VALVE SHUT IN
4/23/2020	9:40	18:10	0	292	1	MOSF GAS LINE VALVE SHUT IN
4/24/2020	13:00	18:00	0	172	1	MOSF GAS LINE VALVE SHUT IN
4/25/2020	12:30	00:00	0	400	1	MOSF GAS LINE VALVE SHUT IN
4/26/2020	0:00	00:00	0	865	1	MOSF GAS LINE VALVE SHUT IN
4/27/2020	0:00	08:00	0	290	1	MOSF GAS LINE VALVE SHUT IN
4/27/2020	18:55	00:00	0	183	1	MOSF GAS LINE VALVE SHUT IN
4/28/2020	0:00	10:30	0	378	1	MOSF GAS LINE VALVE SHUT IN
5/13/2020	18:35	19:20	0	23	0	MOSF GAS LINE VALVE SHUT IN
5/22/2020	7:00	09:00	0	48	1	MOSF GAS LINE VALVE SHUT IN
5/22/2020	13:30	14:30	0	24	1	MOSF GAS LINE VALVE SHUT IN
5/22/2020	17:00	21:00	0	123	1	MOSF GAS LINE VALVE SHUT IN
5/23/2020	20:30	22:15	0	54	1	MOSF GAS LINE VALVE SHUT IN
5/24/2020	20:25	00:00	0	110	1	MOSF GAS LINE VALVE SHUT IN
5/25/2020	0:01	02:00	0	62	1	MOSF GAS LINE VALVE SHUT IN
5/25/2020	12:00	14:00	0	53	1	MOSF GAS LINE VALVE SHUT IN
5/25/2020	16:00	18:00	0	61	1	MOSF GAS LINE VALVE SHUT IN
6/13/2020	9:42	10:22	0	4	0	MOSF GAS LINE VALVE SHUT IN
6/15/2020	3:45	05:00	0	5	0	MOSF GAS LINE VALVE SHUT IN
6/19/2020	4:45	06:45	0	46	0	MOSF GAS LINE VALVE SHUT IN
7/9/2020	19:45	20:45	0	7	0	MOSF GAS LINE VALVE SHUT IN
8/6/2020	12:38	12:43	22	0	0	MAINTENENACE AND TESTING OF FLARE IGNITOR
8/13/2020	10:45	11:45	0	8	0	MOSF GAS LINE VALVE SHUT IN
8/17/2020	18:00	21:00	0	32	0	MOSF GAS LINE VALVE SHUT IN
8/17/2020	22:15	00:00	0	18	0	MOSF GAS LINE VALVE SHUT IN
8/22/2020	4:40	14:15	0	59	0	MOSF GAS LINE VALVE SHUT IN
8/24/2020	4:45	05:45	0	5	0	MOSF GAS LINE VALVE SHUT IN
8/30/2020	13:30	14:15	0	25	0	MOSF PROCESS UPSET
9/3/2020	22:15	22:45	0	1	0	MOSF GAS LINE VALVE SHUT IN
9/5/2020	2:25	03:00	0	3	0	MOSF GAS LINE VALVE SHUT IN
9/5/2020	18:30	19:30	0	6	0	MOSF GAS LINE VALVE SHUT IN
9/16/2020	13:15	13:55	0	24	0	MOSF GAS LINE VALVE SHUT IN
9/25/2020	15:45	19:30	0	35	0	MOSF GAS LINE VALVE SHUT IN
9/26/2020	11:45	12:30	0	29	0	MOSF GAS LINE VALVE SHUT IN
9/27/2020	5:30	06:30	0	26	0	MOSF GAS LINE VALVE SHUT IN
9/27/2020	12:25	13:00	0	22	0	MOSF GAS LINE VALVE SHUT IN
9/28/2020	13:00	16:00	0	33	0	MOSF GAS LINE VALVE SHUT IN
9/28/2020	16:30	18:15	0	28	0	MOSF GAS LINE VALVE SHUT IN
9/29/2020	0:15	02:10	0	29	0	MOSF GAS LINE VALVE SHUT IN
9/29/2020	17:30	19:45	0	30	0	MOSF GAS LINE VALVE SHUT IN
9/30/2020	0:50	03:00	0	30	0	MOSF GAS LINE VALVE SHUT IN
10/3/2020	23:30	00:30	0	3	0	MOSF GAS LINE VALVE SHUT IN
10/4/2020	0:30	02:10	0	6	0	MOSF GAS LINE VALVE SHUT IN

10/4/2020	3:20	04:20	0	3	0 MOSF GAS LINE VALVE SHUT IN
10/4/2020	13:00	14:20	0	5	0 MOSF GAS LINE VALVE SHUT IN
10/5/2020	8:00	08:35	0	2	0 MOSF GAS LINE VALVE SHUT IN
10/11/2020	1:30	07:00	0	42	0 MOSF GAS LINE VALVE SHUT IN
10/11/2020	12:00	12:35	0	2	0 MOSF GAS LINE VALVE SHUT IN
10/11/2020	16:00	16:30	0	2	0 MOSF GAS LINE VALVE SHUT IN
10/12/2020	8:15	09:20	0	11	0 MOSF GAS LINE VALVE SHUT IN
10/12/2020	13:00	13:30	0	4	0 MOSF GAS LINE VALVE SHUT IN
10/12/2020	14:10	15:30	0	24	0 MOSF GAS LINE VALVE SHUT IN
10/14/2020	10:45	15:00	0	162	0 MOSF GAS LINE VALVE SHUT IN
10/14/2020	22:30	23:55	0	38	0 MOSF GAS LINE VALVE SHUT IN
10/16/2020	15:00	15:34	0	24	0 MOSF GAS LINE VALVE SHUT IN
10/19/2020	12:20	13:05	0	32	0 MOSF GAS LINE VALVE SHUT IN
10/21/2020	15:40	18:00	0	92	0 MOSF GAS LINE VALVE SHUT IN
10/22/2020	11:20	14:15	0	122	0 MOSF GAS LINE VALVE SHUT IN
10/22/2020	18:45	23:30	0	285	0 MOSF GAS LINE VALVE SHUT IN
10/23/2020	5:00	13:30	0	329	0 MOSF GAS LINE VALVE SHUT IN
10/23/2020	14:15	16:15	0	77	0 MOSF GAS LINE VALVE SHUT IN
10/23/2020	17:40	18:20	0	25	0 MOSF GAS LINE VALVE SHUT IN
10/23/2020	21:40	23:00	0	52	0 MOSF GAS LINE VALVE SHUT IN
10/24/2020	3:00	04:00	0	39	0 MOSF GAS LINE VALVE SHUT IN
10/27/2020	0:00	01:10	0	45	0 MOSF GAS LINE VALVE SHUT IN
10/27/2020	12:35	13:35	0	39	0 MOSF GAS LINE VALVE SHUT IN
10/27/2020	23:50	00:00	0	23	0 MOSF GAS LINE VALVE SHUT IN
11/3/2020	8:00	09:55	0	93	0 MOSF GAS LINE VALVE SHUT IN
11/11/2020	8:00	23:59	64	0	0 SMART PIGGING
12/21/2020	11:15	14:00	0	122	0 MOSF GAS LINE VALVE SHUT IN
12/28/2020	22:25	23:45	0	52	0 MOSF GAS LINE VALVE SHUT IN
12/29/2020	2:35	06:10	0	98	0 MOSF GAS LINE VALVE SHUT IN
1/4/2021	22:30	23:45	0	34	0 MOSF GAS LINE VALVE SHUT IN
1/18/2021	12:15	13:45	0	28	0 MOSF GAS LINE VALVE SHUT IN
1/18/2021	15:20	16:45	0	28	0 MOSF GAS LINE VALVE SHUT IN
1/31/2021	23:00	23:50	0	12	0 MOSF GAS LINE VALVE SHUT IN
2/1/2021	14:30	17:35	0	40	0 MOSF GAS LINE VALVE SHUT IN
2/6/2021	2:10	02:35	0	24	0 MOSF GAS LINE VALVE SHUT IN
2/16/2021	18:10	00:00	0	169	0 MOSF GAS LINE VALVE SHUT IN
2/17/2021	0:00	06:15	0	175	0 MOSF GAS LINE VALVE SHUT IN
2/17/2021	11:30	17:20	0	163	0 MOSF GAS LINE VALVE SHUT IN
2/26/2021	22:00	22:25	0	5	0 MOSF GAS LINE VALVE SHUT IN
2/27/2021	20:30	21:00	0	20	0 MOSF GAS LINE VALVE SHUT IN
3/1/2021	12:00	14:35	0	72	0 MOSF GAS LINE VALVE SHUT IN
3/2/2021	23:25	00:00	0	16	0 MOSF GAS LINE VALVE SHUT IN
3/3/2021	0:00	00:50	0	23	0 MOSF GAS LINE VALVE SHUT IN
3/3/2021	5:00	12:30	0	182	0 MOSF GAS LINE VALVE SHUT IN
3/4/2021	18:55	19:30	0	16	0 MOSF GAS LINE VALVE SHUT IN
3/14/2021	5:20	11:00	0	157	0 MOSF GAS LINE VALVE SHUT IN
3/15/2021	4:10	04:35	0	22	0 MOSF GAS LINE VALVE SHUT IN
3/15/2021	8:30	09:40	0	32	0 MOSF GAS LINE VALVE SHUT IN
3/17/2021	20:20	21:30	0	32	0 MOSF GAS LINE VALVE SHUT IN
3/17/2021	22:30	00:00	0	41	0 MOSF GAS LINE VALVE SHUT IN
3/26/2021	23:15	00:00	0	24	0 MOSF GAS LINE VALVE SHUT IN
3/27/2021	0:00	00:30	0	23	0 MOSF GAS LINE VALVE SHUT IN
3/27/2021	8:00	11:00	0	95	0 MOSF GAS LINE VALVE SHUT IN
3/31/2021	5:00	23:59	0	26	0 SMART PIGGING
<b>Total</b>			<b>86</b>	<b>7,771</b>	



## Letter of Conformance

May 1, 2021

This is to certify that the CARB Ultra Low Sulfur Dyed Diesel Fuel sold and delivered to DCOR, LLC during the following dates:

**April 1, 2020 to March 31, 2021**

Was in compliance with South Coast Air Quality Management District 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.

Sincerely,

A handwritten signature in black ink, appearing to read "Marissa Mattern".

Marissa Mattern, MBA

Senior Business Development Manager

(805) 585-0521

matternm@scfuels.com



## Letter of Conformance

May 4, 2021

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

DCOR, LLC from 4/1/2020 - 3/31/2021

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



## American Research and Testing Inc.

14834 SOUTH FIGUEROA STREET  
GARDENA CA 90248  
(310) 538-9709 FAX (310) 538-9965  
www.americanresearch.com

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

**NUMBER**  
207-11-095  
November 14, 2007

**SUBJECT:** VOC of Chemco 33-S

### REFERENCE:

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

### SAMPLE DESCRIPTION:

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

### REQUEST:

Determine the VOC of the sample.

### METHOD:

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

### RESULTS:

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

SIGNED FOR THE COMPANY

by

*B. Belmont*

B. Belmont  
Senior Chemist

*Rita R. Boggs, Ph.D.*

Rita R. Boggs, Ph.D.  
President

CHEMCO PRODUCTS COMPANY  
6401 E. Alondra Blvd.

Supporting Documentation Rule 74.6

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

**MATERIAL SAFETY DATA SHEET**

**SECTION I. IDENTIFICATION OF PRODUCT**

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

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

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

**SECTION III. PHYSICAL/CHEMICAL CHARACTERISTICS**

Boiling Point: >212° F	Specific Gravity: 1.086 ± 0.005	Vapor Pressure (mm Hg.): ND	Melting Point: ND
Vapor Density (Air = 1): ND	Evaporation (H2O = 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 H2O 1:1 Resulting VOC gm/L: 22
Flash Point (TCC): None	% LEL: ND	% UEL: ND	Flammable Limits: ND

Extinguishing Media: Water fog, foam, carbon dioxide. Cool containers exposed to flames with water from side.

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

Unusual Fire and Explosion: None known

**SECTION V. HEALTH HAZARD DATA**

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

**(Acute) Health Hazards:**

Eyes: May cause irritation, redness and pain

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

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

Inhalation: May cause irritation of upper respiratory tract

(Chronic) Health Hazards: Prolonged or repeated skin contact may cause skin irritation. This product is not listed as or anticipated to be a potential carcinogen by NTP<sup>1</sup> 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.

0041

**Carcinogenicity:** NTP? No

**SECTION VI. TOXICITY DATA**  
IARC No

OSHA REGULATED? No

**SECTION VII. REACTIVITY DATA**

**Stability:** Stable

**Hazardous Polymerization Will Not Occur**

**Incompatibility (Materials to Avoid):** Strong acids, alkali and oxidizers

**Hazardous Decomposition Byproducts:** Carbon dioxide and carbon monoxide

**SECTION VIII. PRECAUTIONS FOR SAFE HANDLING AND USE**

**Steps to be Taken in Case Material is Released or Spilled:**

**Small Spills:** Mop up. Slippery on floor. Collect spilled material and place in a properly labeled container for later disposal.

**Large Spills:** Contain with dikes and transfer into appropriate containers for reclamation or disposal. Flush traces with plenty of water.

**Disposal:** Dispose of to meet Federal, State & Local requirements

**Handling and Storage:** Store in cool, dry well ventilated area. Keep container tightly closed when not in use.

**Other Precautions:** Keep out of reach of children. FOR INDUSTRIAL AND INSTITUTIONAL USE ONLY.

**SECTION IX. CONTROL MEASURES**

**Respiratory Protection:** NIOSH approved air purifying, if experiencing respiratory irritation

**Ventilation:** Normal ventilation.

**Local Exhaust:** Recommended if generating mist or vapors

**Mechanical (General):** Recommended if generating mist or vapors

**Protective Gloves:** Rubber, vinyl

**Eye Protection:** Chemical safety goggles

**Other Protective Clothing or Equipment:** Long pants, sleeves, apron

**Work/Hygienic Practices:** The recommendations described in this section are provided as general guidance for minimizing exposure when handling this product. Because use conditions will vary, depending upon customer applications, specific safe handling procedures should be developed by persons knowledgeable of the intended use conditions and equipment.

**SECTION X. DOT INFORMATION**  
NOT REGULATED

**SECTION XI. MISCELLANEOUS INFORMATION**

**SARA 313:** 2-butoxyethanol

**Notice:** All information, recommendations, and suggestions appearing herein concerning this product are based upon data obtained from the manufacturer and/or recognized technical sources; however, manufacturer makes no warranty, representation or guarantee as to the accuracy, sufficiency or completeness of the material set forth herein. It is the user's responsibility to determine the safety, toxicity and suitability of his own use, handling and disposal of the product.

NA - Not Available

NE - Not Established

ND - Not Determined









