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Oxnard, CA 93036  
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February 14, 2021

Mr. Keith Macias  
Ventura County APCD  
4567 Telephone Rd., 2<sup>nd</sup> 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, 2021 through December 31, 2021.

Please do not hesitate to contact me at 805-535-2081 with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Heather Carreno". The signature is written in a cursive, flowing style.

Heather Carreno  
Regulatory Compliance Coordinator

Enclosure

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



**DCOR, LLC**

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**2021 ANNUAL COMPLIANCE  
CERTIFICATION REPORT**

**PLATFORM GILDA**

**PART 70  
PERMIT TO OPERATE 1492**

**Submitted to:**

**Ventura County Air Pollution Control District  
4567 Telephone Rd., 2<sup>nd</sup> Floor  
Ventura, CA 93003**

**Submitted by:**

**DCOR, LLC  
1000 Town Center Dr., Suite 600  
Oxnard, CA 93036**

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

**2021**

**COMPLIANCE VERIFICATION REPORT**

**for the time period 1/1/21 – 12/31/21**

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## **SECTION 1**

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### **Compliance Certification**



Ventura County  
Air Pollution  
Control District

**ANNUAL COMPLIANCE CERTIFICATION  
SIGNATURE COVER FORM**

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

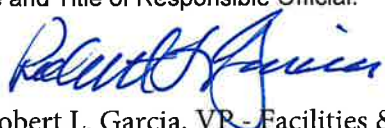
Mr. Gerardo Rios, Chief  
Permits Office (AIR-3)  
Office of Air Division  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**Confidentiality**

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

**Certification by Responsible Official**

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

Signature and Title of Responsible Official:  Title: Robert L. Garcia, VP - Facilities & Process Engineering	Date: <i>2.14.2022</i>
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Time Period Covered by Compliance Certification <u>01</u> / <u>01</u> / <u>2021</u> (MM/DD/YY) to <u>12</u> / <u>31</u> / <u>2021</u> (MM/DD/YY)
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## 1.c. PERIODIC MONITORING SUMMARY

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

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

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

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.1.N1	Rules 71.1.B.1.a, 74.10	<ul style="list-style-type: none"> <li>• Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable</li> <li>• Verbal notice of maintenance activities</li> <li>• Rule 74.10 inspections</li> <li>• Annual compliance certification including verification that tanks are equipped with a vapor recovery system</li> <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 quarterly inspections and tank maintenance activities</li> <li>• Rule 74.10 records</li> </ul>	None	None	
71.1.N6	Rules 71.1.B.3, 71.1.D.1.c, 74.10		<ul style="list-style-type: none"> <li>• 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 NI	Rules 71.4.B.2 and 74.10	<ul style="list-style-type: none"> <li>Verbal notice of maintenance operations</li> <li>Rule 74.10 inspections</li> <li>Annual compliance certification including verifying the integrity of the cover</li> </ul>	<ul style="list-style-type: none"> <li>Records of maintenance</li> <li>Rule 74.10 records</li> </ul>	None	None	
74.9N9	Rule 74.9.D.9	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Daily visual inspection to ensure diesel-fired engine is used to power cranes and welding equipment only</li> </ul>	<ul style="list-style-type: none"> <li>Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location</li> </ul>	None	None	
74.15.1NI	Rule 74.15.1.B.1	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Biennial Source Test (NO<sub>x</sub>, CO)</li> <li>Annual NO<sub>x</sub> and CO screening</li> </ul>	<ul style="list-style-type: none"> <li>Records of source tests</li> <li>Records of NO<sub>x</sub> and CO screenings</li> <li>Daily records of alternate fuel consumption</li> </ul>	None	<ul style="list-style-type: none"> <li>NO<sub>x</sub>-ARB Method 100</li> <li>CO-ARB Method 100</li> </ul>	
ATCM Engine N3	ATCM for Stationary Compression Ignition Engines – OCS	<ul style="list-style-type: none"> <li>Fuel type records</li> <li>Fuel use records</li> </ul>	<ul style="list-style-type: none"> <li>Fuel type records</li> <li>Fuel use records</li> </ul>	None	None	Not federally enforceable
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
PO1492PC1 - Condition No. 1	Rule 29 General Recordkeeping	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Monthly records of throughput and consumption</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records</li> </ul>	None	None	
PO1492PC1 - Condition No. 2	Rule 29 Maximum Number of Oil Wells	<ul style="list-style-type: none"> <li>Annual compliance certification</li> </ul>	None	None	None	
PO1492PC1 - Condition No. 3	Rule 26 Well Operations - BACT Requirements	<ul style="list-style-type: none"> <li>Annual compliance certification</li> </ul>	None	None	None	
PO1492PC1 - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	<ul style="list-style-type: none"> <li>Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery</li> <li>Annual compliance certification</li> </ul>	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"> <li>Rolling twelve month diesel fuel consumption for boats servicing Platforms Gina and Gilda</li> <li>75% of usage for both platforms is the Gilda usage</li> <li>Annual compliance certification</li> <li>Information only</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of diesel fuel consumption for both platforms; and 75% of total is for Gilda</li> </ul>	None	None	
PO1492PC1 - Condition No. 6	Boat engine permitted emissions information	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Information only</li> </ul>	<ul style="list-style-type: none"> <li>Information only</li> </ul>	None	None	
PO1492PC1 - Condition No. 7	Rule 29 Two Crew Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of crew boat operation</li> <li>Maintain a log of boats and engines</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of crew boat operation</li> <li>Maintain a log of crew boats and engines</li> </ul>	None	None	
PO1492PC1 - Condition No. 8	Rule 29 Two Work Boats Shall Not Be Used Simultaneously	<ul style="list-style-type: none"> <li>Maintain a log book of hours and days of work boat operation</li> <li>Maintain a log of boats and engines</li> <li>Annual compliance certification</li> </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	
PO1492PC1 - Condition No. 9	Rules 23 and 29 Solvent Recordkeeping	<ul style="list-style-type: none"> <li>Maintain a list of exempt solvents</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Maintain a list of exempt solvents</li> </ul>	None	None	
PO1492PC2 - Condition Nos. 1, 2, and 5	Rule 29 Flare Fuel Consumption	<ul style="list-style-type: none"> <li>Fuel consumption</li> <li>Identify emergency vs. non-emergency usage</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of fuel consumption</li> </ul>	None	None	



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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1492PC2 - Condition Nos. 3 and 4	Rules 71.1 Flare Ignition System Operation	<ul style="list-style-type: none"> <li>Monthly tests of flare's ignition system</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Records of ignition system</li> <li>Maintenance records</li> </ul>	None	None	
PO1492PC3 - Condition Nos. 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"> <li>Annual compliance certification</li> <li>Monthly records of maintenance and testing hours</li> <li>Monthly records of DRP hours</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records of maintenance and testing hours</li> <li>Monthly records of DRP hours</li> </ul>	None	None	
PO1492PC3 - Condition Nos. 2, 4 and 5	Rules 26 and 74.9 50 hours per year and 200 hours per year backup utility generator operation	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Monthly records of backup utility generator hours of operation</li> </ul>	<ul style="list-style-type: none"> <li>Hours of operation log (non-resettable meter) differentiating non-emergency use and emergency use</li> <li>Monthly and twelve month rolling records of hours of operation</li> </ul>	None	None	
PO1492PC3 - Condition No. 3	ATCM for Stationary Compression Ignition Engines-OCS	<ul style="list-style-type: none"> <li>Fuel type records</li> <li>Fuel use records</li> </ul>	<ul style="list-style-type: none"> <li>Fuel type records</li> <li>Fuel use records</li> </ul>	None	None	Not federally enforceable

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

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

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

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

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

M:\TITLE\TV Permits\PO1492\Permit V\Periodic Monitoring Summary Table-rev421.docx

## **SECTION 2**

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





Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/21 to 12/31/21  
(MM/DD/YY) (MM/DD/YY)

A. Attachment # or Permit Condition #:  <b>None for this reporting period.</b>	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:

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:

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**

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### **Specific Applicable Requirements**



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>71.1N1</b></p>	<p>D. Frequency of monitoring: <b>Daily, Quarterly</b></p>
<p>B. Description:  <b>Fugitive Emission Inspection and Maintenance Program (Rule 74.10) Rule 71.1.B.1a. Compliance via vapor recovery</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></p>
<p>C. Method of monitoring:  <b>Daily visual inspections verifying that the vapor recovery is operational on the tanks. Quarterly inspections per Rule 74.10 and EPA Method 21 ensuring that the hatches do not leak.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u>  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>71.N6</b></p>	<p>D. Frequency of monitoring: <b>Daily, Quarterly</b></p>
<p>B. Description:  <b>Crude Oil Production and Separation, Compliance with Vapor Recovery</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></p>
<p>C. Method of monitoring:  <b>Daily visual inspections verifying that the integrity of the roofs and pressure relief valves on the portable tanks. Quarterly inspections per Rule 74.10 EPA Method 21 ensuring that the hatches do not leak. The VRU is a closed system.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u>  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>71.4N1</b></p>	<p>D. Frequency of monitoring: <b>Quarterly</b></p>
<p>B. Description:  <b>Petroleum Sumps, Pits, Ponds and Well Cellar Compliance</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></p>
<p>C. Method of monitoring:  <b>Quarterly inspections verifying the integrity of covers and/or roofs on sumps. Quarterly inspections per Rule 74.10 EPA Method 21 ensuring that the hatches do not leak.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u>  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 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)

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



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant: NOx
C. Measured Emission Rate: 20.4 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: 2/25/2021

A. Emission Unit Description: 4.0 MMBtu/hr Process Heater			B. Pollutant: CO
C. Measured Emission Rate: 39.9 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: 2/25/2021

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)

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

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

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

## **SECTION 4**

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### **Permit Specific Conditions**



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>PTO 1492 Permit Condition 1 Item 4</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Maximum Sulfur Content of Diesel Fuel: Rule 29</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></p>
<p>C. Method of monitoring:  <b>Records of sulfur content of diesel fuel maintained from fuel supplier.</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>PTO 1492 Permit Condition 1 Item 5</b></p>	<p>D. Frequency of monitoring: <b>Daily</b></p>
<p>B. Description:  <b>Crew and Work Boat Emission Limits: Rules 26 and 29</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></p>
<p>C. Method of monitoring:  <b>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.</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>PTO 1492 Condition 1 Item 6</b></p>	<p>D. Frequency of monitoring: <b>Daily</b></p>
<p>B. Description:  <b>Two Crew Boats Shall not be used Simultaneously: Rule 29</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></p>
<p>C. Method of monitoring:  <b>Log book maintained confirming crew boat activity including hours, days, and location of activity. Annual certification of compliance.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u>  G. Compliance Status? (C or I): <u>  C  </u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>  N  </u>  *If yes, attach Deviation Summary Form</p>





## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)

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

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring:  <b>Monthly</b></p>
<p>B. Description:  <b>Solvent Recordkeeping: Rule 29</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></p>
<p>C. Method of monitoring:  <b>Monthly records 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>  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>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (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>  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:  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>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PTO 1492 Condition 3 Section 1</p>	<p>D. Frequency of monitoring: <b>Monthly, Annually</b></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 <b>N/A</b></p>
<p>C. Method of monitoring:  Monitoring of all reasons for use (i.e., loss of grid electricity or loss of stationary source's own power production).</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

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

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

## **SECTION 5**

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### **General Applicable Requirements**



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 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 Evaluation</b></p>
<p>B. Description:  <b>Visible Emissions - Opacity</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></p>
<p>C. Method of monitoring:  <b>Perform routine surveillance and visual inspections to ensure that compliance with Rule 50 is being maintained.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u>  G. Compliance Status? (C or I): <u>  C  </u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>  N  </u>  *If yes, attach Deviation Summary Form</p>

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

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



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Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 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>Laboratory analysis conducted annually of Non-PUC quality fuel gas; Determination of Sulfur in a gaseous matrix.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u>  G. Compliance Status? (C or I): <u>  C  </u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>  N  </u>  *If yes, attach Deviation Summary Form</p>

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 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>Rules 71.1C and 74.10: Crude Oil Production and Separation</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>N/A</b></p>
<p>C. Method of monitoring: Produced gas must be controlled at all times and is verified through the daily visual and periodic maintenance of the produced gas collection system on Platform Gilda. Produced gas is either directed to sales, vapor compressor or flare. Compliance with Rule 74.10 ensures that various components are not leaking. The produced gas stream is a fully controlled closed loop system.</p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u> G. Compliance Status? (C or I): <u>  C  </u> H. *Excursions, exceedances, or other non-compliance?(Y or N): <u>  N  </u> <i>*If yes, attach Deviation Summary Form</i></p>

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 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:  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 #: <b>Rule 74.10</b></p>	<p>D. Frequency of monitoring: <b>Daily, Quarterly, Annually</b></p>
<p>B. Description:  <b>Fugitive Emissions - Oilfields</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></p>
<p>C. Method of monitoring:  Maintain a fugitive emission inspection and maintenance program that is consistent with the requirements of Rule 74.10.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></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:  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>





## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)

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

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

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

## **SECTION 6**

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 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:  <b>Visible emission inspection during abrasive blasting operations. Use of California Certified abrasive sands.</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 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:  <b>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.</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 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:  <b>All drilling operations powered by grid power, or have exemption from grid power.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u>  G. Compliance Status? (C or I): <u>  C  </u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>  N  </u>  *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 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 1492</b></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>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 1492</b></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>40 CFR Part 55</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Outer Continental Shelf Air Regulations</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></p>
<p>C. Method of monitoring:  <b>Compliance with Permit to Operate 1492</b></p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u>  G. Compliance Status? (C or I): <u>  C  </u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>  N  </u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>40 CFR Part 68</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Accidental Release Prevention and Risk Management Plans</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></p>
<p>C. Method of monitoring:  <b>Compliance with Permit to Operate 1492</b></p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u>  G. Compliance Status? (C or I): <u>  C  </u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>  N  </u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>40 CFR Part 82</b></p>	<p>D. Frequency of monitoring: <b>Annual Compliance Certification</b></p>
<p>B. Description:  <b>Protection of Stratospheric Ozone</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <b>N/A</b></p>
<p>C. Method of monitoring:  <b>Compliance with Permit to Operate 1492</b></p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u>  G. Compliance Status? (C or I): <u>  C  </u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>  N  </u>  *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)

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

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

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

## **SECTION 7**

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### **Supporting Documentation**

## PLATFORM GILDA DIESEL CRANES FUEL USAGE

GILDA	NORTH CRANE 325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-20	35	165	1327
Feb-20	11	57	1096
Mar-20	5	29	1039
Apr-20	4	29	1028
May-20	4	28	991
Jun-20	3	17	971
Jul-20	4	23	915
Aug-20	4	24	862
Sep-20	4	9	834
Oct-20	2	34	685
Nov-20	5	79	527
Dec-20	3	18	512
Jan-21	3	17	363
Feb-21	35	203	510
Mar-21	16	103	583
Apr-21	32	191	745
May-21	21	134	852
Jun-21	7	38	873
Jul-21	2	15	865
Aug-21	3	22	862
Sep-21	4	56	909
Oct-21	9	57	932
Nov-21	3	23	877
Dec-21	6	31	890
North Crane permit limits	19,250 gal/yr		

GILDA	SOUTH CRANE 325 bhp CAT 3406		
	Hours	Gallons	12 Mo. Rolling Total Gallons
Jan-20	46	240	2004
Feb-20	16	89	1616
Mar-20	15	85	1561
Apr-20	11	66	1523
May-20	10	65	1488
Jun-20	9	63	1469
Jul-20	15	120	1475
Aug-20	14	109	1475
Sep-20	9	56	1511
Oct-20	12	24	1278
Nov-20	12	189	1219
Dec-20	17	86	1193
Jan-21	13	70	1023
Feb-21	28	149	1083
Mar-21	36	223	1221
Apr-21	194	1203	2358
May-21	91	580	2873
Jun-21	12	62	2872
Jul-21	11	57	2809
Aug-21	14	67	2766
Sep-21	20	118	2829
Oct-21	29	164	2968
Nov-21	16	96	2875
Dec-21	10	74	2863
South Crane permit limits	17,200 gal/yr		



**Ventura County Air Pollution Control District**

**Compliance Source Test Report**

**DCOR LLC  
Platform Gilda**

**4.0 MMBtu/hr Process Heater  
Permit No. 01492**

**Prepared by  
Aeros Environmental, Inc.**

**Determination of Concentrations and Emissions of  
NO<sub>x</sub> and CO**

**Project 21-0643B  
(Reference Aeros Project 092-2478)**

**Tested February 25, 2021**



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## Project Information

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**Permit Holder:**

DCOR LLC  
290 Maple Court, Suite 290  
Ventura, CA 93003  
(805) 535-2060  
cwhite@dcorllc.com

*Attention: Christine White*

**Source:**

Platform Gilda;  
One 4.0 MMBtu/hr Process Heater  
Permit No. 01492

**Independent Contractor:**

Aeros Environmental, Inc.  
18828 Highway 65  
Bakersfield, CA 93308  
(661) 391-0112  
chris.gatlin@stacktest.com

*Attention: Chris Gatlin, QSTI*

**Agency Administrator:**

Ventura County APCD  
669 County Square Drive  
Ventura, CA 93003  
(805) 645-1413  
ed@vcapcd.org

*Attention: Ed Swede*



## Certification

March 30, 2021

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

Dear Christine:

Regarding Project 092-2478, referred to in this report, I, Chris Gatlin, as Project Supervisor and on-site director of the testing program described in this report, do hereby certify the sampling, analytical procedures, and results presented in this report are authentic and accurate according to the methods and procedures used.

  
Chris Gatlin, QSTI

Regarding Project 092-2478, referred to in this report, I certify that I have reviewed the sampling, analytical procedures, and results reported herein, and have found them to be accurate and true according to the methods and procedures used.

  
Scott Davis, QSTI

---

***"Professional Air Emissions Testing and Analytical Services"***

18828 Highway 65 • Bakersfield, CA 93308  
(661) 391-0112 • (661) 391-0153 Fax

## **Summary of Results**

**Aeros Environmental, Inc.**  
**Summary of Results**

**DCOR LLC**  
**Platform Gilda**  
**4.0 MMBtu/hr Process Heater**

**Project 092-2478**  
**February 25, 2021**  
**Permit No. 01492**

<b>Pollutant</b>	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>	<b>Mean</b>	<b>Permit Limits</b>
<b>O<sub>2</sub></b> %	1.29	1.17	1.10	<b>1.19</b>	<b>N/A</b>
<b>NO<sub>x</sub></b> ppm	22.3	22.4	22.8	<b>22.5</b>	<b>30 ppm @ 3% O<sub>2</sub></b>
ppm @ 3% O <sub>2</sub>	20.3	20.3	20.6	<b>20.4</b>	
lb/hr	0.03	0.03	0.03	<b>0.03</b>	
lb/MMBtu	0.0247	0.0246	0.0250	<b>0.0248</b>	
<b>CO</b> ppm	47.8	43.4	40.5	<b>43.9</b>	<b>400 ppm @ 3% O<sub>2</sub></b>
ppm @ 3% O <sub>2</sub>	43.6	39.3	36.6	<b>39.9</b>	
lb/hr	0.04	0.04	0.03	<b>0.04</b>	
lb/MMBtu	0.0322	0.0291	0.0270	<b>0.0294</b>	

## **Introduction**

## Introduction

On February 25, 2021, Aeros Environmental, Inc. performed compliance source testing for DCOR LLC on Platform Gilda. One 4.0 MMBtu/hr process heater was tested for concentrations and emissions of NO<sub>x</sub> and CO. The purpose of the testing was to document compliance with the issued permit. The following methods were used.

Parameter	Method	Analysis Method	Test Runs
NO <sub>x</sub>	CARB Method 100	Chemiluminescent Analyzer	3 15 minute
CO	CARB Method 100	Gas Filter Correlation Analyzer	3 15 minute
O <sub>2</sub>	CARB Method 100	Paramagnetic Analyzer	3 15 minute
Volume Flow	EPA Method 19	Calculated based on fuel rates supplied by DCOR, LLC and fuel analysis	3
Natural Gas F-factor and Calorific Value	Fuel Analysis ASTM D1945 and D3588	GC-TCD C <sub>1</sub> – C <sub>6</sub> +, CO <sub>2</sub> , O <sub>2</sub> , N <sub>2</sub> and Btu/lb	1

The testing was conducted by Chris Gatlin of Aeros Environmental, Inc. All in-house analytical lab analyses were performed at Aeros Environmental, Inc.'s Bakersfield facility. Analyses were supervised and the results reviewed by the Technical/Laboratory Director, Tim Brennan. The testing was not supervised by DCOR LLC. The Ventura County Air Pollution Control District was not present to witness the testing.



## **CARB Method 100**

**Aeros Environmental, Inc.**  
**CARB Method 100**

**DCOR LLC**  
**Platform Gilda**  
**4.0 MMBtu/hr Process Heater**

**Project 092-2478**  
**February 25, 2021**

Run 1  
NO<sub>x</sub>, CO and O<sub>2</sub>  
@ 68 °F

**Calculated Results**

Pollutant	O <sub>2</sub> %	ppm	ppm		
			@ 3% O <sub>2</sub>	lb/hr	lb/MMBtu
Oxides of Nitrogen (NO <sub>x</sub> )	1.29	22.3	20.3	0.03	0.0247
Carbon Monoxide (CO)	1.29	47.8	43.6	0.04	0.0322
Fuel Rate = 24.34 Mcfd Fuel F-factor = 8706 dscf/MMBtu Fuel Calorific Value = 1190 Btu/cf Volumetric Exhaust Gas Flow Rate = 187 dscfm <sup>1</sup>					

**Supporting Data**

Stack Gas Measurement Data								
Time Interval			Uncorrected Values			Drift Corrected Values		
Start	-	End	O <sub>2</sub> %	NO <sub>x</sub> ppm	CO ppm	O <sub>2</sub> %	NO <sub>x</sub> ppm	CO ppm
13:05	-	13:20	1.38	22.0	47.4	1.29	22.3	47.8
Calibration Data and Instrument Drift								
						O <sub>2</sub>	NO <sub>x</sub>	CO
Full Scale Range ( r )						10	50	200
Span						9.58	45.06	176
Calibration Gas Value						4.77	22.53	88
Initial Zero, ppm or %						0.00	0.0	-0.1
Initial Calibration, ppm or %						4.71	22.3	85.5
Initial Zero Bias, ppm or %						0.11	0.3	0.6
Initial Calibration Bias, ppm or %						4.82	22.1	86.9
Pre-test Run Zero Bias, ppm or %						0.11	0.3	0.6
Pre-test Run Calibration Bias, ppm or %						4.82	22.1	86.9
Post-test Run Zero Bias, ppm or %						0.10	0.4	0.5
Post-test Run Calibration Bias, ppm or %						4.79	22.3	86.6
Zero Drift, % r (Equation 100-1)						0.1	-0.1	0.1
Calibration Drift, % r (Equation 100-1)						0.3	-0.4	0.2
Zero System Bias, % r (Equation 100-2)						-1.0	-0.8	-0.3
Upscale System Bias, % r (Equation 100-2)						-0.8	-0.1	-0.6

<sup>1</sup> Volumetric exhaust gas flow rate is calculated from fuel usage by EPA Method 19

**Aeros Environmental, Inc.**  
**CARB Method 100**

**DCOR LLC**  
**Platform Gilda**  
**4.0 MMBtu/hr Process Heater**

**Project 092-2478**  
**February 25, 2021**

Run 2  
NO<sub>x</sub>, CO and O<sub>2</sub>  
@ 68 °F

**Calculated Results**

Pollutant	O <sub>2</sub> %	ppm	ppm @ 3% O <sub>2</sub>	lb/hr	lb/MMBtu
Oxides of Nitrogen (NO <sub>x</sub> )	1.17	22.4	20.3	0.03	0.0246
Carbon Monoxide (CO)	1.17	43.4	39.3	0.04	0.0291
Fuel Rate = 24.40 Mcfd Fuel F-factor = 8706 dscf/MMBtu Fuel Calorific Value = 1190 Btu/cf Volumetric Exhaust Gas Flow Rate = 186 dscfm <sup>1</sup>					

**Supporting Data**

Stack Gas Measurement Data								
Time Interval			Uncorrected Values			Drift Corrected Values		
Start	-	End	O <sub>2</sub> %	NO <sub>x</sub> ppm	CO ppm	O <sub>2</sub> %	NO <sub>x</sub> ppm	CO ppm
13:33	-	13:48	1.25	22.06	43.0	1.17	22.37	43.4
Calibration Data and Instrument Drift								
						O <sub>2</sub>	NO <sub>x</sub>	CO
Full Scale Range ( r )						10	50	200
Span						9.58	45.06	176
Calibration Gas Value						4.77	22.53	88
Initial Zero, ppm or %						0.00	0.0	-0.1
Initial Calibration, ppm or %						4.71	22.3	85.5
Initial Zero Bias, ppm or %						0.11	0.3	0.6
Initial Calibration Bias, ppm or %						4.82	22.1	86.9
Pre-test Run Zero Bias, ppm or %						0.10	0.4	0.5
Pre-test Run Calibration Bias, ppm or %						4.79	22.3	86.6
Post-test Run Zero Bias, ppm or %						0.12	0.3	0.5
Post-test Run Calibration Bias, ppm or %						4.79	22.1	87.0
Zero Drift, % r (Equation 100-1)						-0.1	0.0	0.1
Calibration Drift, % r (Equation 100-1)						0.3	0.0	-0.1
Zero System Bias, % r (Equation 100-2)						-1.2	-0.6	-0.3
Upscale System Bias, % r (Equation 100-2)						-0.8	0.4	-0.8

<sup>1</sup> Volumetric exhaust gas flow rate is calculated from fuel usage by EPA Method 19

**Aeros Environmental, Inc.**  
**CARB Method 100**

**DCOR LLC**  
**Platform Gilda**  
**4.0 MMBtu/hr Process Heater**

**Project 092-2478**  
**February 25, 2021**

Run 3  
NO<sub>x</sub>, CO and O<sub>2</sub>  
@ 68 °F

**Calculated Results**

Pollutant	O <sub>2</sub> %	ppm	ppm @ 3% O <sub>2</sub>	lb/hr	lb/MMBtu
Oxides of Nitrogen (NO <sub>x</sub> )	1.10	22.8	20.6	0.03	0.0250
Carbon Monoxide (CO)	1.10	40.5	36.6	0.03	0.0270
Fuel Rate = 24.40 Mcfd Fuel F-factor = 8706 dscf/MMBtu Fuel Calorific Value = 1190 Btu/cf Volumetric Exhaust Gas Flow Rate = 185 dscfm <sup>1</sup>					

**Supporting Data**

Stack Gas Measurement Data								
Time Interval			Uncorrected Values			Drift Corrected Values		
Start	-	End	O <sub>2</sub> %	NO <sub>x</sub> ppm	CO ppm	O <sub>2</sub> %	NO <sub>x</sub> ppm	CO ppm
14:01	-	14:16	1.20	22.5	40.3	1.10	22.8	40.5
Calibration Data and Instrument Drift								
						O <sub>2</sub>	NO <sub>x</sub>	CO
Full Scale Range ( r )						10	50	200
Span						9.58	45.06	176
Calibration Gas Value						4.77	22.53	88
Initial Zero, ppm or %						0.00	0.0	-0.1
Initial Calibration, ppm or %						4.71	22.3	85.5
Initial Zero Bias, ppm or %						0.11	0.3	0.6
Initial Calibration Bias, ppm or %						4.82	22.1	86.9
Pre-test Run Zero Bias, ppm or %						0.12	0.3	0.5
Pre-test Run Calibration Bias, ppm or %						4.79	22.1	87.0
Post-test Run Zero Bias, ppm or %						0.11	0.4	0.4
Post-test Run Calibration Bias, ppm or %						4.79	22.5	87.2
Zero Drift, % r (Equation 100-1)						0.0	-0.2	0.1
Calibration Drift, % r (Equation 100-1)						0.3	-0.6	-0.1
Zero System Bias, % r (Equation 100-2)						-1.1	-0.8	-0.2
Upscale System Bias, % r (Equation 100-2)						-0.8	-0.3	-0.9

<sup>1</sup> Volumetric exhaust gas flow rate is calculated from fuel usage by EPA Method 19

## **Methodology**

## Continuous Emissions Monitoring System (CEMS)

*Reference: San Joaquin Valley Unified Air Pollution Control District, Source Test Guidelines, May 4, 1998  
State of California Air Resources Board, Test Methods 1-100, July 1997  
EPA CFR Title 40, Pt. 60, Appendix A, Methods 3A, 6C, 7E, 10, 20 and 25*

### Instrument Summary

A constant sample of flue gas is extracted, dried, filtered, and delivered to an instrument manifold system for distribution to one or more analyzers. Instrument results are recorded on an analog strip chart recorder. System calibration checks are performed, as well as calibration checks at the beginning and ending of each test run. Final data reduction includes zero and calibration drift corrections.

### Sample System

The sample probe is constructed of borosilicate glass, 316 grade stainless steel, or Duranert-coated stainless steel. It is fitted with a sintered stainless steel or Pyrex glass wool particulate filter, as needed. A Teflon (TFE) sample line connects the probe to a water condensation system located at the source. The condensation system consists of three 500 ml short stem glass impingers, connected in a series, immersed in an ice bath. The gas is delivered to the instrument trailer with a diaphragm pump. The sample system is leak checked prior to sampling by sealing the end of the sample probe and adjusting the sample pump to its maximum rate (approximately 22" Hg). When all of the sampling flow rotameters indicate a "zero" flow measurement, the sampling system is considered leak free.

### Manifold System

The sample gas is delivered to each analyzer through a five-way valve and regulated with a needle valve flow rotameter. Manifold pressure is controlled with a backpressure regulator, which is typically set at three psi. Zero gases (N<sub>2</sub>), as well as other appropriate calibration gases, are delivered to each analyzer through the same five-way valve and flow rotameter. All manifold parts consist of glass, stainless steel, or Teflon materials.

### Data Acquisition and Analog Strip Chart Data Reduction

Measurement data from each analyzer output is recorded by an electronic Data Acquisition System and manually on a color analog strip chart recorder. Both systems are set up specifically for each job requirement.

### Data Acquisition System (DAS)

The electronic DAS acts as the primary source of all measurement data for reporting purposes. The DAS polls the voltage output of each analyzer every 1/100<sup>th</sup> of a second. The data is then presented on the computer screen as six second and one minute averages. The one minute averages are then printed out in tabular form in excel and presented in the report.

### Analog Strip Chart Recorder

The analog strip chart recorder acts as the secondary source of all measurement data and as a record of all testing and calibration activities. Data is recorded for each analyzer continuously by separate-discrete colored pens on 110% full scale paper. Color copies of the strip chart are presented in the report.

## Field Standard Operating Procedures

Continuous Emissions Monitoring System (CEMS)  
Calculations

Reference: State of California Air Resources Board, Test Methods 1-100, June 1979.  
EPA Code of Federal Regulations, Title 40, Part 60 Appendix A, Methods 3A, 6C, 7E, 10, 20 and 25A.

## Equations:

$$1. \text{ ppm @ } 3\% O_2 = \text{ ppm}_x \times \frac{17.9}{(20.9 - \% O_2)}$$

$$2. \text{ ppm @ } 15\% O_2 = \text{ ppm}_x \times \frac{5.9}{(20.9 - \% O_2)}$$

$$3. \text{ lb/hr} = \text{ ppm}_x \times MW_x \times DSCFM \times 1.557 \times 10^{-7}$$

$$4. \text{ lb/MMBtu} = \text{ ppm}_x \times \frac{20.9}{(20.9 - \% O_2)} \times MW_x \times F_{68} \times 2.59 \times 10^{-9}$$

$$5. \text{ lb/MMCF} = \text{ lb/MMBtu} \times CV$$

## Where:

% O<sub>2</sub> = Stack gas oxygen, % volume dry

DSCFM = Stack gas flow, dry standard cubic feet per minute @ 68°F and 29.92" Hg

F<sub>68</sub> = EPA fuel F-factor @ 68°F

CV = Calorific value of fuel, Btu/CF or MMBtu/MMCF

MW<sub>x</sub> = Molecular weight of pollutant (x) where:

MW NO<sub>x</sub> = 46 as NO<sub>2</sub>

MW SO<sub>2</sub> = 64 as SO<sub>2</sub>

MW CO = 28 as CO

MW VOC = 16 as methane or variable pending VOC species

## Field Standard Operating Procedures

Volume Flow Rate  
DSCFM by Fuel Rate and Fuel F-factor (Fd)

Reference: EPA Code of Federal Regulations, Title 40, Part 60 Appendix A, Method 19.

The exhaust gas volume flow rate (DSCFM) is calculated based on the fuel flow rate (MMBtu/hr) and the Fuel F-factor (Fd, DSCF/MMBtu) corrected to the stack gas oxygen content (% O<sub>2</sub> vd).

## Symbol Identification

DSCFM = Exhaust gas dry standard cubic feet per minute  
 Fd = Fuel F-factor, DSCF/MMBtu  
 CFH = Fuel Flow Rate, cubic feet per hour @ 60° F or 68° F  
 GPH = Fuel Flow Rate, gallons per hour @ 60° F or 68° F  
 GCV = Fuel gross calorific value, Btu/lb

## Calculations:

$$1. \text{ DSCFM} = \frac{\text{MMBtu}}{\text{hr}} \times Fd \times \frac{20.9}{(20.9 - \%O_2)} \times \frac{1 \text{ hr}}{60 \text{ min}}$$

$$2. \frac{\text{MMBtu}}{\text{hr}}, \text{ gaseous fuels} = \text{CFH} \times \frac{\text{MMBtu}}{\text{CF}}$$

$$\frac{\text{MMBtu}}{\text{hr}}, \text{ liquid fuels} = \text{GPH} \times \frac{\text{MMBtu}}{\text{gal}}$$

$$3. Fd = \frac{\text{DSCF} \times \text{exhaust gas}}{\text{MMBtu}} \quad @ \quad 29.92'' \text{ Hg \& } 68^\circ \text{ F}$$

*based on fuel elemental analysis and gross calorific value*

$$Fd = \frac{10^6 (3.64 (\%H) + 1.53 (\%C) + 0.57 (\%S) + 0.14 (\%N) - 0.46 (\%O))}{\text{GCV}}$$

$$4. Fd @ 60^\circ \text{ F} = Fd @ 68^\circ \text{ F} \times \frac{520}{528}$$



## **Operating Data**

**Aeros Environmental, Inc.  
Operational Data**

Client DCOR, LLC  
 Site Platform Gilda  
 Source Process Heater

Project 092-2478  
 Date 02-25-21

Test Type Compliance

	PRELIM					
Run	1	1	2	2	3	3
Time	1305	1320	1333	1348	1401	1416
O <sub>2</sub>	1.35	1.29		1.17		1.10
NOx	21.87	22.28		22.37		27.78
CO	46.61	47.80		43.38		40.50
NOx @ 3%	20.0	20.34		20.29		20.59
Limit	30 PPM @ 3% O <sub>2</sub>		O <sub>2</sub>			
CO @ 3%	42.7	43.64		39.35		36.61
Limit	400 PPM @ 3% O <sub>2</sub>		O <sub>2</sub>			

Other Fuel Data

Coef K		1.883		1.885		1.883
Red		3.6		3.6		3.6
Blue		3.59		3.6		3.6
Fuel Rate	MCFD	24.34		24.4		24.4

## **Data Acquisition**

**Aeros Environmental, Inc.**  
**Data Acquisition**

DCOR LLC  
Platform Gilda  
4.0 MMBtu/hr Process Heater

Project 092-2478  
February 25, 2021

**Run 1**  
**DAS Raw Data**

<b>Date</b>	<b>Time</b>	<b>O<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>
2/25/2021	13:20:00	1.37	22.25	46.47
2/25/2021	13:19:00	1.39	22.08	46.57
2/25/2021	13:18:00	1.33	21.99	46.94
2/25/2021	13:17:00	1.33	21.99	47.77
2/25/2021	13:16:00	1.36	22	47.96
2/25/2021	13:15:00	1.35	21.93	48.42
2/25/2021	13:14:00	1.38	21.88	48.4
2/25/2021	13:13:00	1.41	21.9	48.14
2/25/2021	13:12:00	1.41	21.93	47.57
2/25/2021	13:11:00	1.4	21.88	46.54
2/25/2021	13:10:00	1.35	21.87	46.61
2/25/2021	13:09:00	1.37	21.92	47.13
2/25/2021	13:08:00	1.39	21.97	47.4
2/25/2021	13:07:00	1.44	22	47.46
2/25/2021	13:06:00	1.39	22.24	47.32
		<b>1.38</b>	<b>21.99</b>	<b>47.38</b>

**Aeros Environmental, Inc.**  
**Data Acquisition**

DCOR LLC  
Platform Gilda  
4.0 MMBtu/hr Process Heater

Project 092-2478  
February 25, 2021

**Run 2**  
**DAS Raw Data**

<b>Date</b>	<b>Time</b>	<b>O<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>
2/25/2021	13:48:00	1.26	22.19	43.15
2/25/2021	13:47:00	1.26	22.21	42.99
2/25/2021	13:46:00	1.25	22.17	43.49
2/25/2021	13:45:00	1.25	22.13	43.5
2/25/2021	13:44:00	1.26	22.09	43.28
2/25/2021	13:43:00	1.23	22.03	44.12
2/25/2021	13:42:00	1.23	21.94	44.97
2/25/2021	13:41:00	1.26	21.87	44.15
2/25/2021	13:40:00	1.24	21.9	43.55
2/25/2021	13:39:00	1.25	21.87	42.92
2/25/2021	13:38:00	1.24	21.94	42.45
2/25/2021	13:37:00	1.26	22.01	42.63
2/25/2021	13:36:00	1.25	22.13	42.17
2/25/2021	13:35:00	1.28	22.18	41.19
2/25/2021	13:34:00	1.3	22.26	41.16
		<b>1.25</b>	<b>22.06</b>	<b>43.05</b>

**Aeros Environmental, Inc.**  
**Data Acquisition**

DCOR LLC  
Platform Gilda  
4.0 MMBtu/hr Process Heater

Project 092-2478  
February 25, 2021

**Run 3**  
**DAS Raw Data**

<b>Date</b>	<b>Time</b>	<b>O<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>
2/25/2021	14:16:00	1.23	22.42	42.1
2/25/2021	14:15:00	1.23	22.44	41.51
2/25/2021	14:14:00	1.21	22.44	41.17
2/25/2021	14:13:00	1.19	22.46	41.36
2/25/2021	14:12:00	1.17	22.41	40.43
2/25/2021	14:11:00	1.13	22.45	39.73
2/25/2021	14:10:00	1.14	22.49	39.9
2/25/2021	14:09:00	1.16	22.49	40.26
2/25/2021	14:08:00	1.18	22.46	40.37
2/25/2021	14:07:00	1.2	22.46	39.94
2/25/2021	14:06:00	1.22	22.52	39.38
2/25/2021	14:05:00	1.22	22.55	39.53
2/25/2021	14:04:00	1.23	22.6	39.96
2/25/2021	14:03:00	1.22	22.72	39.64
2/25/2021	14:02:00	1.2	22.91	39.88
		<b>1.20</b>	<b>22.52</b>	<b>40.34</b>

## **Instrument Strip Charts**

**Aeros Environmental, Inc.**  
**Instrument Strip Chart**

DCOR LLC  
Platform Gilda

Project 092-2478  
February 25, 2021

Initial Leak Check: 8:30

Instrument	Units	Range	High Concentration	Mid Concentration	Time
O <sub>2</sub>	%	10	9.58	4.77	10:34
NO <sub>x</sub>	ppm	50	45.06	22.53	10:50
CO	ppm	200	176	88	12:49

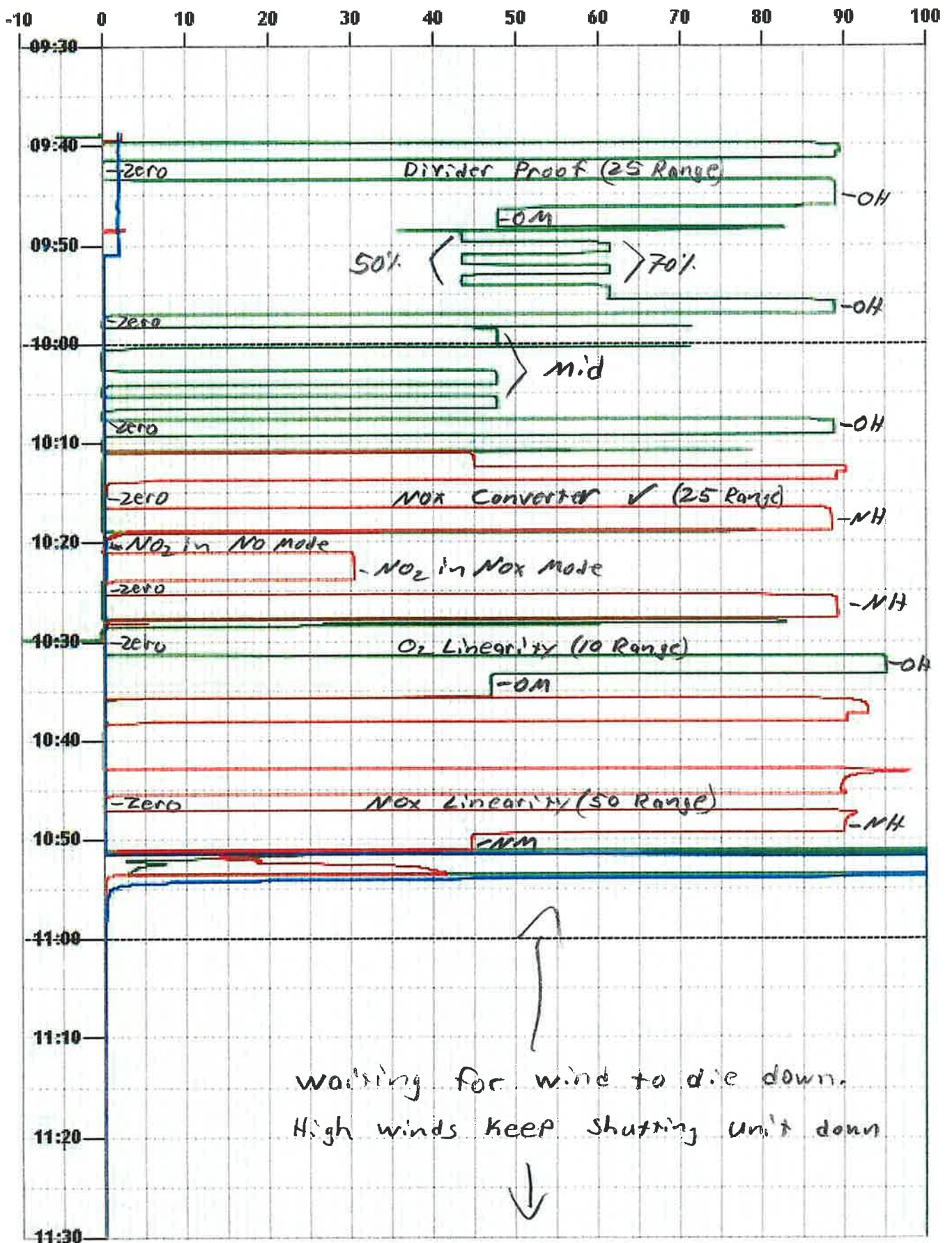
**Onsite Contacts:**

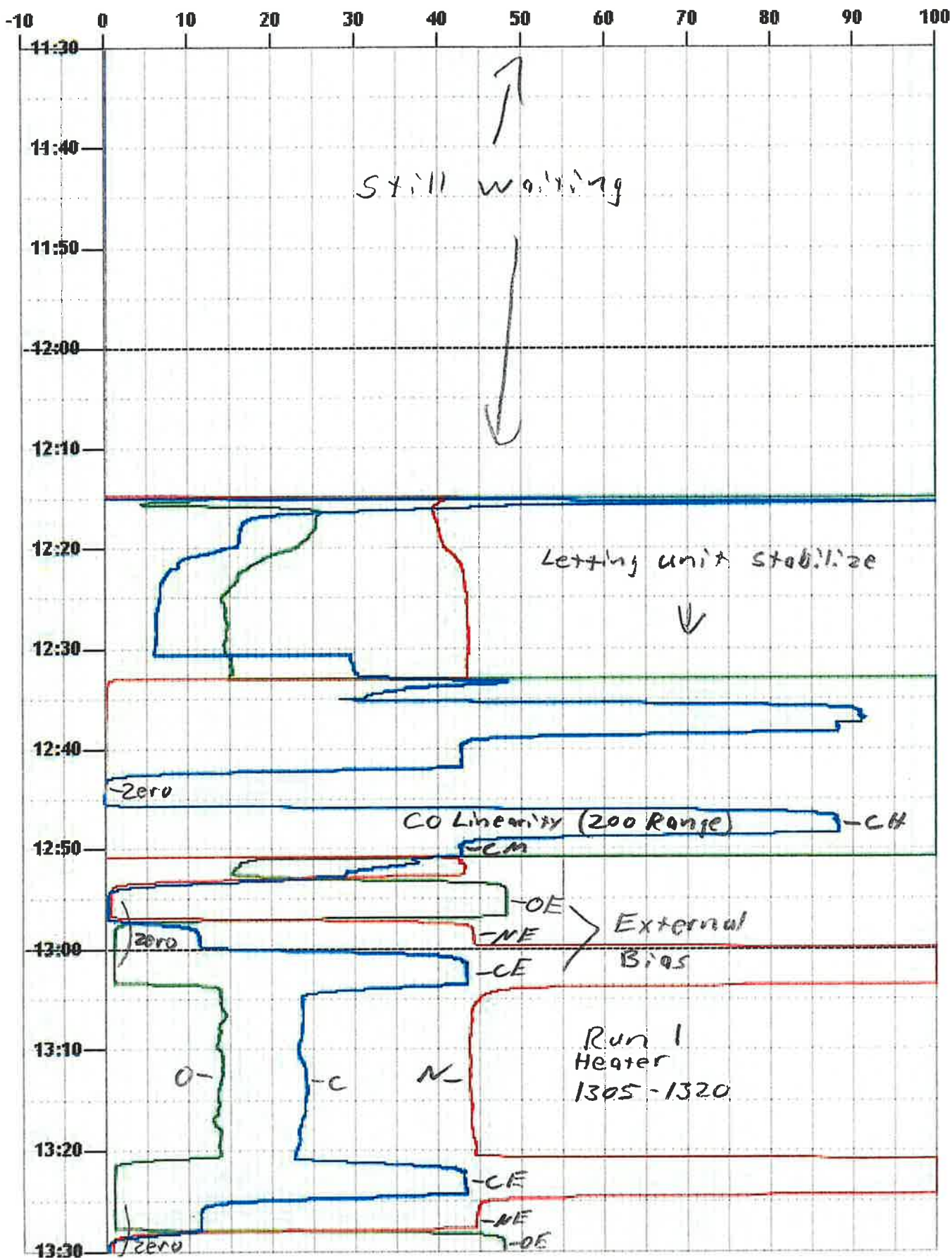
Aeros Environmental, Inc. : Chris Gatlin

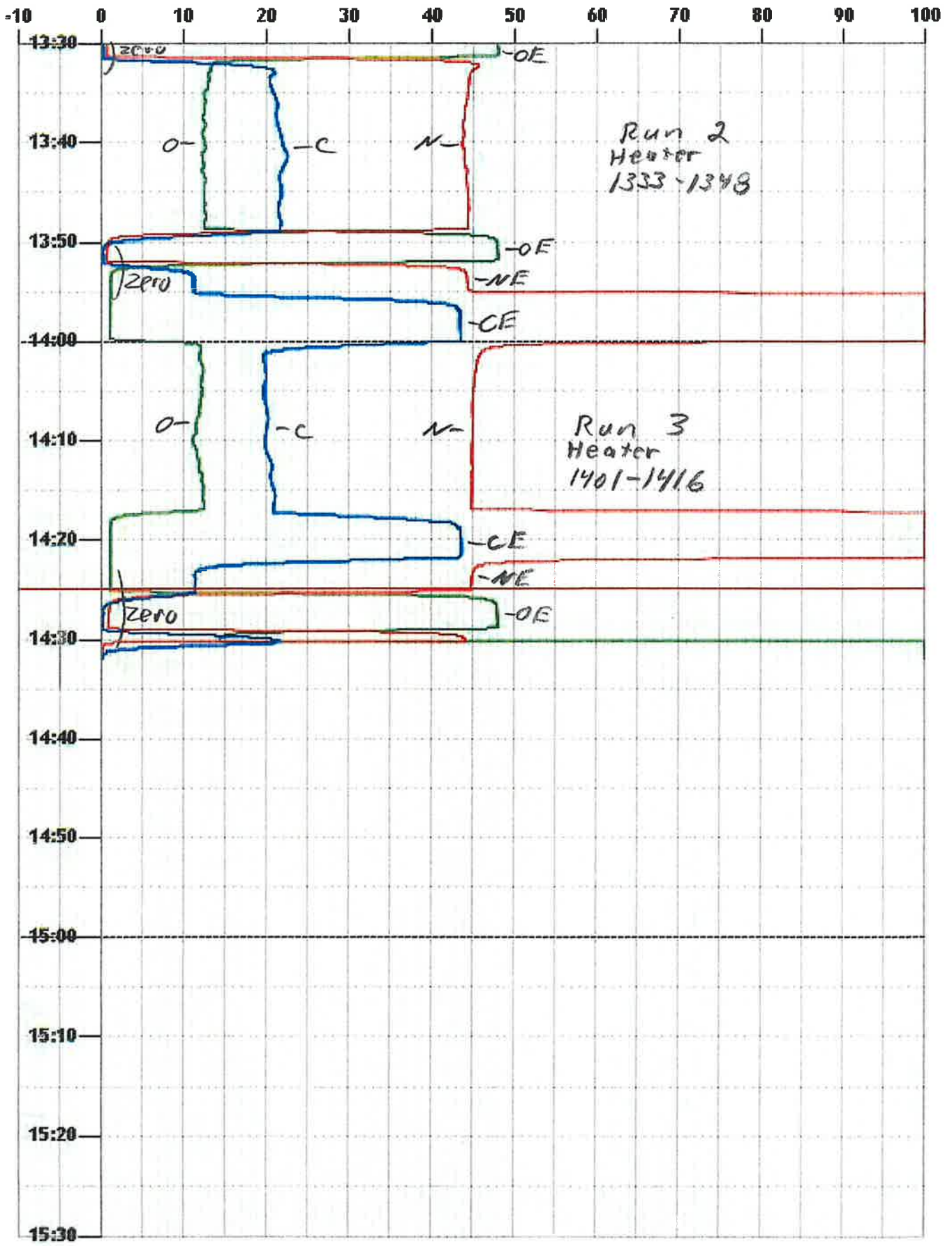
DCOR LLC : None

Ventura County APCD : None









**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-20	749	0.75	9.06
Feb-20	719	0.72	9.06
Mar-20	825	0.83	9.11
Apr-20	879	0.88	9.20
May-20	815	0.82	9.21
Jun-20	813	0.81	9.24
Jul-20	722	0.72	9.15
Aug-20	683	0.68	9.10
Sep-20	784	0.78	9.04
Oct-20	805	0.81	9.06
Nov-20	802	0.80	9.34
Dec-20	515	0.52	9.11
Jan-21	536	0.54	8.90
Feb-21	590	0.59	8.77
Mar-21	765	0.77	8.71
Apr-21	680.5	0.68	8.51
May-21	722	0.72	8.42
Jun-21	718	0.72	8.32
Jul-21	718	0.72	8.32
Aug-21	700	0.70	8.34
Sep-21	704	0.70	8.26
Oct-21	511	0.51	7.96
Nov-21	528.3	0.53	7.69
Dec-21	620	0.62	7.79

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

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

	Pilot	Planned	Unplanned	12 Month 'Rolling' Total	
	MCF	MCF	MCF	Pilot MMCF	Planned MMCF
Jan-20	62	0	51	0.73	0.19
Feb-20	58	0	2102	0.73	0.19
Mar-20	62	0	1032	0.73	0.19
Apr-20	60	0	2747	0.73	0.19
May-20	62	2	735	0.73	0.19
Jun-20	60	0	212	0.73	0.19
Jul-20	62	0	792	0.73	0.00
Aug-20	62	0	2076	0.73	0.00
Sep-20	60	0	58	0.73	0.00
Oct-20	62	24	1536	0.73	0.03
Nov-20	60	3	347	0.73	0.03
Dec-20	62	0	3011	0.73	0.03
Jan-21	62	0	516	0.73	0.03
Feb-21	56	0	0	0.73	0.03
Mar-21	78	0	249	0.75	0.03
Apr-21	78	0	480	0.76	0.03
May-21	61	0	8	0.76	0.03
Jun-21	60	0	257	0.76	0.03
Jul-21	62	0	160	0.76	0.03
Aug-21	62	0	174	0.76	0.03
Sep-21	60	0	0	0.76	0.03
Oct-21	60	318	10	0.76	0.32
Nov-21	60	232	11	0.76	0.55
Dec-21	62	0	3	0.76	0.55

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

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

**Gilda North Crane**

Oil / Filter Change	3/6/2019	1/15/2020	2/7/2021
Air Cleaner Inspection	3/6/2019	1/15/2020	2/7/2021
Belt / Hose Inspection	3/6/2019	1/15/2020	2/7/2021

**Gilda South Crane**

Oil / Filter Change	8/29/2019	1/15/2020	2/7/2021
Air Cleaner Inspection	8/29/2019	1/15/2020	2/7/2021
Belt / Hose Inspection	8/29/2019	1/15/2020	2/7/2021

**Gilda Emergency Generator**

Oil / Filter Change	12/23/19	12/30/2020	10/19/2021
Air Cleaner Inspection	12/23/19	12/30/2020	10/19/2021
Belt / Hose Inspection	12/23/19	12/30/2020	10/19/2021

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

**Aeros Environmental, Inc.**  
**Summary of Results**

**DCOR LLC**  
**Platform Gilda**  
**4.0 MMBtu/hr Process Heater**

**Project 092-2478**  
**February 25, 2021**  
**Permit No. 01492**

<b>Pollutant</b>	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>	<b>Mean</b>	<b>Permit Limits</b>
<b>O<sub>2</sub></b> %	1.29	1.17	1.10	<b>1.19</b>	N/A
<b>NO<sub>x</sub></b> ppm	22.3	22.4	22.8	<b>22.5</b>	<b>30 ppm @ 3% O<sub>2</sub></b>
ppm @ 3% O <sub>2</sub>	20.3	20.3	20.6	<b>20.4</b>	
lb/hr	0.03	0.03	0.03	<b>0.03</b>	
lb/MMBtu	0.0247	0.0246	0.0250	<b>0.0248</b>	
<b>CO</b> ppm	47.8	43.4	40.5	<b>43.9</b>	<b>400 ppm @ 3% O<sub>2</sub></b>
ppm @ 3% O <sub>2</sub>	43.6	39.3	36.6	<b>39.9</b>	
lb/hr	0.04	0.04	0.03	<b>0.04</b>	
lb/MMBtu	0.0322	0.0291	0.0270	<b>0.0294</b>	



**Platform Gilda - PTO 01492**

**619 BHP Caterpillar Diesel Engine  
Monthly Summary**

**2021**

	Non-Emergency Use		Emergency Use
	Total	Maintenance and Testing Total	Total
	<i>hrs</i>	<i>hrs</i>	<i>hrs</i>
January	2.10	2.10	0.00
February	38.20	38.20	0.00
March	1.70	1.70	0.00
April	1.40	1.40	0.00
May	1.30	1.30	0.00
June	1.90	1.90	0.00
July	1.40	1.40	0.00
August	2.10	2.10	0.00
September	1.20	1.20	0.00
October	1.60	1.60	0.00
November	18.90	1.40	17.50
December	1.60	1.60	0.00
<b>Total</b>	<b>73.40</b>	<b>55.90</b>	<b>17.50</b>





# VISUAL EMISSION INSPECTION LOG


Dos Cuadras Offshore Resources

**FACILITY:**

Platform Gilda

**DATE:**

4/7/2021

Start Time	End Time	Equipment					VISIBLE EMISSION? (YES/NO)	 <b>CALIFORNIA</b> AIR RESOURCES BOARD Air Quality Training Program Awards This Certificate To <b>Jesse VanHoy</b> <small>For Completion of</small> <b>MM106 - Visible Emissions Evaluation: Day Certification</b>  <b>Student ID #: 26719</b>
		North Crane	South Crane	PRODUCTION STDBY GEN	Flare	HTM		
9:40 AM	9:42 AM	X					NO	gV
10:35 AM	10:37 AM		X				NO	gV
11:45 AM	11:47 AM					X	NO	gV
12:00 PM	12:02 PM			X			NO	gV
12:10 PM	12:12 PM				X		NO	gV

Comments:

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

**Crew Boat Fuel Usage**

	Total Fuel	Gina 25%	Gilda 75%
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
Apr-21	10,931	2,733	8,199
May-21	7,717	1,929	5,788
Jun-21	3,935	984	2,951
Jul-21	2,531	633	1,898
Aug-21	2,048	512	1,536
Sep-21	2,244	561	1,683
Oct-21	3,235	809	2,426
Nov-21	4,141	1,035	3,106
Dec-21	2,061	515	1,546
<b>2021 Total</b>	<b>12,870</b>	<b>38,610</b>	

**Supply Boat Fuel Usage**

	Gina		Gilda	
	Mains	Aux	Mains	Aux
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
Apr-21	217	49	650	146
May-21	193	10	580	30
Jun-21	35	2	105	5
Jul-21	201	10	604	30
Aug-21	366	18	1,098	55
Sep-21	913	41	2,739	122
Oct-21	1,199	51	3,598	154
Nov-21	1,359	68	4,078	205
Dec-21	829	56	2,488	167
<b>2021 Total</b>	<b>6,057</b>	<b>469</b>	<b>18,170</b>	<b>1,408</b>

	Rolling 12 Mo Total	
	Gina	Gilda
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
Apr-21	14,715	44,146
May-21	16,039	48,118
Jun-21	16,289	48,866
Jul-21	15,878	47,634
Aug-21	15,764	47,293
Sep-21	16,397	49,192
Oct-21	17,522	52,567
Nov-21	19,173	57,519
Dec-21	19,409	58,226

Platform Gina Permitted Fuel Total:  
Platform Gilda Permitted Fuel Total:

84,400  
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-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
Apr-21	0.094	1.780	0.085	0.055	0.845	0.281	5.340	0.254	0.166	2.536
May-21	0.102	1.940	0.092	0.060	0.922	0.306	5.821	0.276	0.180	2.765
Jun-21	0.104	1.970	0.094	0.061	0.936	0.311	5.911	0.281	0.183	2.808
Jul-21	0.101	1.921	0.091	0.060	0.912	0.303	5.762	0.274	0.179	2.737
Aug-21	0.100	1.907	0.091	0.059	0.906	0.301	5.721	0.272	0.177	2.717
Sep-21	0.104	1.984	0.094	0.061	0.942	0.313	5.951	0.283	0.184	2.826
Oct-21	0.112	2.120	0.101	0.066	1.007	0.335	6.359	0.302	0.197	3.020
Nov-21	0.122	2.319	0.110	0.072	1.102	0.366	6.958	0.330	0.216	3.305
Dec-21	0.124	2.348	0.112	0.073	1.115	0.371	7.044	0.335	0.218	3.345

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

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

### Crew Boats:

Capt T Le  
Patrick  
Alan T  
Luke  
Raven  
Isabel L  
Marlin  
John Henry

### Supply Boats:

Ryan T  
Alan T  
Capt T Le  
Patrick  
Kenneth Carl  
Nicholas L  
Isabel L  
Adele Elise  
John Henry

### Boat Engines:

Ryan T  
4 - 575 BHP John Deere 6135AFM85, Main Engines  
2 - 40 BHP Alaska Diesel Northern Light Model M30CW3, Generator Engines  
Total BHP 2380

Capt T Le  
3 - 575 BHP John Deere 6135AFM85, Main Engines  
2 - 40 BHP Alaska Diesel Northern Light Model M30CW3, Generator Engines  
Total BHP 1805

Alan T  
3 - 575 BHP John Deere 6135AFM85, Main Engines  
2 - 40 BHP Alaska Diesel Northern Light Model M30CW3, Generator Engines  
Total BHP 1805

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

Kenneth Carl  
2 - 671 BHP Caterpillar C18, Main Engines  
2 - 42.9 BHP Yanmar Co., Generator Engines  
Total BHP 1428

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

Raven  
2 - 510 HP Detroit Diesel 12V-71TI, Main Engines  
1 - 32 BHP Northern Lights ML 844L, Generator Engine  
Total BHP 1052

Marlin  
2 - 450 BHP Cummins QSM11-M, Main Engines  
Total BHP 900

Isabel L  
3 - 575 BHP John Deere 6135AFM85, Main Engines  
2 - 43 BHP Kohler 32EKOZD, Generator Engines  
Total BHP 1811

John Henry  
2 - 671 BHP Caterpillar C-18, Main Engines  
2 - 99 BHP John Deere 4045TFM85A, Generator Engines  
1 - 76 BHP Detroit Diesel 4-7 IN Series, Fire Water Pump Engine OOS  
Total BHP 1616



## Letter of Conformance

December 31, 2021

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

**January 1, 2021 to December 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

January 27, 2022

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to DCOR, LLC  
FROM 01/01/2021-12/31/2021

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.

*David Reynolds*

Vice President  
Maxum Petroleum  
Office (901) 775-8945

**VENTURA COUNTY APCD**  
**RULE 74.10**  
**COMPONENT LEAK REPORT**  
**Report for the 1st Quarter of 2021**

FACILITY: DCOR, PLATFORM GILDA

PERMIT#: 1492

Method of  
Inspection:  
TVA

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 2/4/2021






**VENTURA COUNTY APCD**  
**RULE 74.10**  
**COMPONENT LEAK REPORT**  
**Report for the 3rd Quarter of 2021**

FACILITY: DCOR, PLATFORM GILDA

PERMIT#: 1492

Method of  
Inspection:  
**TVA**

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 8/10/2021							

**VENTURA COUNTY APCD**  
**RULE 74.10**  
**COMPONENT LEAK REPORT**  
**Report for the 4th Quarter of 2021**

FACILITY: DCOR, PLATFORM GILDA

PERMIT#: 1492

Method of  
Inspection:  
  
TVA

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 10/20/2021							

Platform Gilda Flaring Events					
100 MMBtu/hr Flare					
Flare Date	Planned flaring	MCF flared	H2S ppm	SO2 Emission factor lb/MMCF	SO2 Emissions lb
1/15/2021		1	0	0.00	0.000
1/28/2021		188	170	28.71	5.397
1/28/2021		82	169	28.54	2.340
1/29/2021		245	179	30.23	7.406
3/15/2021		16	2	0.34	0.005
3/31/2021		233	0	0.00	0.000
4/1/2021		364	0	0.00	0.000
4/2/2021		57	0	0.00	0.000
4/7/2021		57	0	0.00	0.000
4/11/2021		2	0	0.00	0.000
5/23/2021		3	0	0.00	0.000
5/31/2021		5	0	0.00	0.000
6/11/2021		197	0	0.00	0.000
6/12/2021		27	0	0.00	0.000
6/12/2021		13	0	0.00	0.000
6/14/2021		20	0	0.00	0.000
7/1/2021		4	0	0.00	0.000
7/9/2021		98	0	0.00	0.000
7/21/2021		58	0	0.00	0.000
8/27/2021		174	0	0.00	0.000
10/5/2021		10	0	0.00	0.000
10/25/2021	P	1	0	0.00	0.000
10/31/2021	P	317	0	0.00	0.000
11/1/2021	P	55	0	0.00	0.000
11/2/2021	P	91	0	0.00	0.000
11/3/2021	P	86	0	0.00	0.000
11/6/2021		3	0	0.00	0.000
11/9/2021		3	0	0.00	0.000
11/10/2021		3	0	0.00	0.000
11/17/2021		1	0	0.00	0.000
11/23/2021		1	0	0.00	0.000
12/1/2021		1	0	0.00	0.000
12/5/2021		1	0	0.00	0.000
12/5/2021		1	0	0.00	0.000
<b>TOTAL</b>		<b>2,418.0</b>			<b>15.15</b>
<b>TOTAL SULFUR EMISSIONS (lbs)</b>					<b>15.15</b>
<b>*Planned Flaring (MCF) =</b>					<b>550</b>
<b>Annual Limits:</b>					
27,012 MCF/year (per VCAPCD, platform specific limit based on previous 5 years from when rules were written)					
1.80 tons SOx/year (per PTO 1492, Table 4)					