Rebecca Trujillo
Regulatory Affairs Manager
West Coast Decommissioning Program

February 11, 2025

Mr. Keith Macias
Ventura County Air Pollution Control District
4567 Telephone Road
Ventura, CA 93003

Re: Title V Part 70 Annual Compliance Certification Report for Platform Gail (1494) - Reporting Period of January 1, 2024 through December 31, 2024

Dear Mr. Macias,

Pursuant to the requirements of the Title V Part 70 Federal Operating Permit No. 1494, Chevron USA Inc. has submitted the attached Platform Gail Part 70 Annual Compliance Certification Report for the reporting period of January 1, 2024, through December 31, 2024 via email. Attached is the signed Annual Compliance Certification Signature Cover Form to accompany same.

Please advise if you have any questions or need any further information. You can contact me directly via email at rebecca.trujillo@chevron.com or via phone 805-979-3506. Thank you.

Kind regards,

Rebecca Trujillo
Regulatory Affairs Manager

Chevron North America Exploration and Production Company
a division of Chevron U.S.A. Inc.
3916 State Street, Suite 2114, Santa Barbara, CA 93105
Tel 805 979 3506
Rebecca.Trujillo@chevron.com

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM

TV Permit # 1494

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

Ms. Roshni Brahmbhatt
Enforcement & Compliance Enforcement 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:	Date: 02/12/2025
Title: Regulatory Affairs Manager	

Time Period Covered by Compliance Certification

01 / 01 / 2024 (MM/DD/YY) to 12 / 31 / 2024 (MM/DD/YY)

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PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 24 to 12 / 31 / 24

A. Attachment # or Permit Condition #: 71.1N4	D. Frequency of monitoring: Annual
B. Description: Tanks Exempt from Vapor Recovery, Tanks Exempt from Roof and Pressure-Vacuum Relief Valve, Low ROC Content Exemption	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual validation/compliance certification that the tanks are exempt via independent lab analysis by EPA method 8015D, T-03	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.9N9	D. Frequency of monitoring: Periodic
B. Description: Stationary Compression Ignition Engines Used Solely on OCS Platforms.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual validation/compliance certification and maintenance of data records for each engine including the function of the engine, manufacturer, model number, and location. Routine surveillance of the engine to ensure compliance is being maintained.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: ATCM ENG.N3	D. Frequency of monitoring: Periodic
B. Description: All stationary compression ignition engines	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual certification that monthly fuel consumption records and fuel type records are maintained. **ATCM emission standards are not federally enforceable.**	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 01 / 01 / 24 to 12 / 31 / 24

A. Attachment # or Permit Condition #: 40CFR63ZZZZN4	D. Frequency of monitoring: Periodic
B. Description: RICE MACT for non- emergency diesel engines less than or equal to 300 HP – oil change and inspections. Applies to North Crane Diesel Engine.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain maintenance records. Annual compliance certification that maintenance records are maintained.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #:40CFR63ZZZZN6-1494	D. Frequency of monitoring: Annual
B. Description: RICE MACT for non- emergency diesel engines greater than 500 HP – oil change and inspections. Applies to North Crane Diesel Engine.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Maintain maintenance records. Annual compliance certification that maintenance records are maintained and CO source testing is maintained tri-annually (records).	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO1494PC1-Condition No. 1	D. Frequency of monitoring: Periodic
B. Description: Platform Gail Additional Requirements - 12-month rolling records of throughput and consumption as provided in the Permitted Throughput and Consumption Limits Table in Section No. 3 of the Permit.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Monthly records of throughputs and fuel consumption. Annual compliance certification that these records are maintained. **See attached 12-Month Rolling data.**	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 01 / 01 / 24 to 12 / 31 / 24

A. Attachment # or Permit Condition #: PO1494PC1-Condition No. 2	D. Frequency of monitoring: Periodic
B. Description: Platform Gail Additional Requirements - Maximum sulfur content of diesel fuel consumed in the crane engines and the boats.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Records of certifications from the fuel supplier documenting the sulfur content of each diesel fuel delivery are maintained.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO1494PC1-Condition No. 3 and No. 4	D. Frequency of monitoring: Periodic
B. Description: Platform Gail Additional Requirements – Crew Boat and work boat fuel use/emission limits	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Monthly records of fuel consumption from the crew and work boats are maintained. Monthly emissions are calculated for the crew and work boats and are maintained in 12-month rolling records. Annual compliance certification that these records are maintained. See attached 12-month data.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO1494PC1-Condition No. 5	D. Frequency of monitoring: Periodic
B. Description: Platform Gail Additional Requirements - Crew boat permitted engines	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No more than two crew boats can be used at any given time. Records are maintained showing the days and hours that each crew boat was in service. Annual compliance certification that these records are maintained.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 01 / 01 / 24 to 12 / 31 / 24

A. Attachment # or Permit Condition #: PO1494PC1-Condition No. 6	D. Frequency of monitoring: Periodic
B. Description: Platform Gail Additional Requirements - Work boat permitted engines	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No more than two work boats can be used at any given time. Records are maintained showing the days and hours that each work boat was in service. Annual compliance certification that these records are maintained.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO1494PC1-Condition No. 7	D. Frequency of monitoring: Periodic
B. Description: Platform Gail Additional Requirements - Solvent Recordkeeping	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Records of solvent purchase and usage, along with records of solvent that is recycled or disposed of are maintained for solvents used in solvent cleaning activities, including wipe cleaning. Annual compliance certification that these records are maintained.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO1494PC3	D. Frequency of monitoring: Periodic
B. Description: Platform Gail additional requirements – Drain Pit Operations	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual Compliance certification that the 7.07 sqft deck drain pit serves as a containment berm and so is not considered a pit.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 01 / 01 / 24 to 12 / 31 / 24

A. Attachment # or Permit Condition #:PO1494PC5	D. Frequency of monitoring:
B. Description: Platform Gail additional requirements – OOS Emissions Units	Annual
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual Compliance certification that units are out of service	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #:50	D. Frequency of monitoring:
B. Description: Opacity requirements.	Annual
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Routine surveillance to ensure that opacity requirements are being maintained. Records including date, time, and identity of emissions unit of any occurrences of visible emissions not meeting Rule 50 opacity requirements are maintained. District notification within subsequent 24 hours if visible emissions problem cannot be corrected within first 24 hours.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 54.B.1 (OCS)	D. Frequency of monitoring:
B. Description: Sulfur Compounds – Sulfur emission concentration requirements at point of discharge	Periodic
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual certification that records of each planned and unplanned flaring event are maintained. A representative fuel analysis is being maintained if applicable.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 01 / 01 / 24 to 12 / 31 / 24

A. Attachment # or Permit Condition #: 54.B.2 (OCS)	D. Frequency of monitoring: Periodic
B. Description: Sulfur Compounds – Sulfur emission concentration requirements at ground level	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual certification that records of each planned and unplanned flaring event are maintained. A representative fuel analysis is being maintained.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 57.1	D. Frequency of monitoring: None
B. Description: Combustion contaminants requirements – Specific – Fuel burning equipment	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual compliance certification that combustion contaminants were not discharged into the atmosphere from any fuel-burning equipment at the facility in excess of the concentration at the point of discharge, 0.1 grain per cubic foot of gas calculated to 12% CO_2 at standard conditions.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #:64.B.1	D. Frequency of monitoring: Annual
B. Description: Gaseous fuel sulfur compounds concentration requirements for all combustion emissions units at this facility combusting gaseous fuel.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual compliance certification that natural gas is not combusted at the facility in any quantity.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 24 to 12 / 31 / 24

A. Attachment # or Permit Condition #:64.B.2	D. Frequency of monitoring: Periodic
B. Description: Solid or liquid fuel sulfur compounds concentration requirements for all combustion emissions units at this facility combusting solid or liquid fuel.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Fuel supplier's certifications containing fuel sulfur content by weight for each fuel delivery are maintained.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.6	D. Frequency of monitoring: Periodic
B. Description: Surface cleaning and degreasing requirements including ROC content limits, application and storage requirements	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Records of current material list of ROC-containing material used in solvent cleaning activities are maintained. Routine surveillance of the applicable solvent cleaning activities is also performed.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #:74.11.1	D. Frequency of monitoring: None
B. Description: Large Water Heaters and Small Boilers	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual certification that platform Gail does not have any applicable units.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 01 / 01 / 24 to 12 / 31 / 24

A. Attachment # or Permit Condition #:74.22	D. Frequency of monitoring: None
B. Description: Natural gas-fired, fan-type central furnaces – NO_x limits and certification requirements	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual certification that platform Gail does not have any applicable units.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #:74.1	D. Frequency of monitoring: Annual
B. Description: Abrasive blasting requirements	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Routine surveillance including assuring that visual inspections, operation, equipment and recordkeeping requirements are being met.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #:74.2	D. Frequency of monitoring: Periodic
B. Description: Architectural coatings requirements.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Routine surveillance and records including specifying the usage of compliant coatings and maintaining VOC records of coatings used (MSDSs are maintained).	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 24 to 12 / 31 / 24

A. Attachment # or Permit Condition #: 40CFR.61.M	D. Frequency of monitoring: None
B. Description: National Emissions Standards for Asbestos	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual certification that inspection procedures outlined in 40 CFR Part 61.145 are met.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

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

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ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 2024 (MM/DD/YY) to 12 / 31 / 2024 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: 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 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:	

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ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01/ 01 / 24 (MM/DD/YY) to 12 / 31 / 24 (MM/DD/YY)

A. Emission Unit Description:			B. Pollutant:
No source testing during this reporting period.			
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:
			4
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:

Analytical Report

Oilfield Environmental & Compliance, Inc.

Jay Rao
DCOR, LLC
16000 Dallas Pkwy Ste 240
Dallas, TX 75248

OEC Work Order: **2411696**

Report Date: **December 24, 2024 08:06**

Project: **Platform Gail**

Number: Waste Water Sump

Enclosed is an analytical report for the above referenced project. The samples included in this report were received on December 18, 2024 12:16 and analyzed in accordance with the attached chain-of-custody.

Unless otherwise noted, all analytical testing was accomplished in accordance with the guidelines established in our Quality Manual, applicable standard operating procedures, and other related documentation. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety.

If you have any questions regarding this report, please do not hesitate to contact the undersigned.

Authorized for release by:

Meredith Sprister, Business Director
msprister@oecusa.com

307 Roemer Way, Suite 300
Santa Maria, CA 93454

Main: (805) 922-4772
Fax: (805) 925-3376

PJLA Testing Accreditation #99137

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TNI 2016 & ISO/IEC 17025:2017
CA-ELAP 2438, TNI 02666

DCOR, LLC 16000 Dallas Pkwy Ste 240 Dallas TX, 75248	Project: Platform Gail Project Number: Waste Water Sump Project Manager: Jay Rao	WO & Reported: 2411696 12/24/2024 08:06

Sample Summary

Sample ID	Laboratory ID	Client Matrix	Lab Matrix	Date Sampled	Date Received
Platform Gail Waste Water	2411696-01	Water	Water	12/17/2024 13:15	12/18/2024 12:16

Sample Batch Preparation Summary

Analysis	Batch ID	Preparation Date/Time
ROC Volatile by GC/MS 8260M ROC (C3-C10)	B4L0720	12/19/2024 07:06

Oilfield Environmental & Compliance, Inc.

DCOR, LLC 16000 Dallas Pkwy Ste 240 Dallas TX, 75248	Project: Platform Gail Project Number: Waste Water Sump Project Manager: Jay Rao	WO & Reported: **2411696** 12/24/2024 08:06

Analytical Report for Samples

Sample ID : **Platform Gail Waste Water**
Matrix : Water
Lab ID : 2411696-01

Sampled : 12/17/24 13:15
Sampled by : Keith Garcia
Field Data : NA

Analyte	Result	RL	Units	Dilution	Batch	Analyzed	Method	Notes
ROC Volatile by GC/MS								**R-01**
ROC (C3-C10)	ND	1000	ug/L	20	B4L0720	12/19/24 14:54	EPA 8260B Mod.	**TPH-Samp**
Surrogate: Dibromofluoromethane		*89 %*	*(72 - 130)*		"	"	"	
Surrogate: Toluene-d8		*81 %*	*(70 - 122)*		"	"	"	
Surrogate: 4-Bromofluorobenzene		*90 %*	*(70 - 129)*		"	"	"	

DCOR, LLC 16000 Dallas Pkwy Ste 240 Dallas TX, 75248	Project: Platform Gail Project Number: Waste Water Sump Project Manager: Jay Rao	WO & Reported: 2411696 12/24/2024 08:06

ROC Volatile by GC/MS - Quality Control

Analyte	Result	RL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B4L0720 - EPA 8260B Mod. Preparation: EPA 5030B VOCGCMS 12/19/24 07:06										
Blank (B4L0720-BLK1)			Analyzed: 12/19/24 10:37							
ROC (C3-C10)	ND	50	ug/L							TPH-Samp
Surrogate: Dibromofluoromethane		*11.6*	"	*12.5*		*93*	*72-130*			
Surrogate: Toluene-d8		*11.3*	"	*12.5*		*91*	*70-122*			
Surrogate: 4-Bromofluorobenzene		*13.0*	"	*12.5*		*104*	*70-129*			
LCS (B4L0720-BS2)			Analyzed: 12/19/24 09:46							
ROC (C3-C10)	560	50	ug/L	500		112	62-138			TPH-QC
Surrogate: Dibromofluoromethane		*12.4*	"	*12.5*		*99*	*72-130*			
Surrogate: Toluene-d8		*12.7*	"	*12.5*		*102*	*70-122*			
Surrogate: 4-Bromofluorobenzene		*12.7*	"	*12.5*		*102*	*70-129*			
LCS Dup (B4L0720-BSD2)			Analyzed: 12/19/24 10:11							
ROC (C3-C10)	534	50	ug/L	500		107	62-138	5	20	TPH-QC
Surrogate: Dibromofluoromethane		*11.6*	"	*12.5*		*93*	*72-130*			
Surrogate: Toluene-d8		*12.7*	"	*12.5*		*101*	*70-122*			
Surrogate: 4-Bromofluorobenzene		*12.5*	"	*12.5*		*100*	*70-129*			
Duplicate (B4L0720-DUP1)	**Source: 2411707-01**		Analyzed: 12/19/24 17:00							
ROC (C3-C10)	ND	20,000	ug/L		ND				20	TPH-Samp
Surrogate: Dibromofluoromethane		*11.2*	"	*12.5*		*90*	*72-130*			
Surrogate: Toluene-d8		*10.9*	"	*12.5*		*87*	*70-122*			
Surrogate: 4-Bromofluorobenzene		*12.3*	"	*12.5*		*98*	*70-129*			
Matrix Spike (B4L0720-MS2)	**Source: 2411724-01**		Analyzed: 12/19/24 17:51							
ROC (C3-C10)	1480	50	ug/L	500	936	110	70-130			TPH-QC
Surrogate: Dibromofluoromethane		*9.94*	"	*12.5*		*80*	*72-130*			
Surrogate: Toluene-d8		*13.0*	"	*12.5*		*104*	*70-122*			
Surrogate: 4-Bromofluorobenzene		*11.8*	"	*12.5*		*94*	*70-129*			

Sample Method Summary

Analysis	Method	Matrix	Laboratory & Certification
ROC Volatile by GC/MS			
8260M ROC (C3-C10)	EPA 8260B Mod.	Water	OEC, Internal 2010 Preisker Lane Ste F Santa Maria, CA 93454

DCOR, LLC 16000 Dallas Pkwy Ste 240 Dallas TX, 75248	Project: Platform Gail Project Number: Waste Water Sump Project Manager: Jay Rao	WO & Reported: 2411696 12/24/2024 08:06

Notes and Definitions

Qualifier	Definition
MDL	Method Detection Limit
RL	Reporting Limit (Quantitation Limit)
ND	Analyte NOT DETECTED at or above the method limit (MDL)
RPD	Relative Percent Difference
R-01	The Reporting Limit has been raised to account for matrix interference.
TPH-QC	Fuel species quality control samples are quantitated against a full-range known species standard.
TPH-Samp	Specific carbon ranges are calibrated using a full-range species standard. Ranges reported not defined by EPA 8015 or the SWRCB LUFT Manual are not certified by CA-ELAP.

Sample Receipt

Work Order Receipt is Complete

Work Order
2411696 **Refresh**

Client Name	Temp °C	Thermometer ID	Refrigerator(s)	COC Received	Login
DCOR, LLC	4.2	2	3	12 / 18 / 2024 12:16	12 / 18 / 2024 12:42

Recorded Corrected, Acceptable Range 0°C to 4°C (See Exception Notes Below)

Sample Transport

- ☐ OECCourier/Sampler
- ☐ After Hours Drop Off
- ☑ Delivery (Other than OEC)
- ☐ Shipment Carrier
- Tracking#

Custody Seals	☑ None Present		
Cooler(s)	☐ Present, Intact	☐ Present, Not Intact	☐ None
Sample(s)	☐ Present Intact	☐ Present, Not Intact	☐ None

Condition/Preservation

		Yes	No	N/A
☑	Received On Ice Within Range (Acceptable)			
☐	Received Outside Range(Acceptable)			
☐	Direct from Field on Ice			
☐	Ambient: Air or Filter Matrix			
☐	Received Ambient, Placed on Ice			
☐	Sample Temperature Accetable for Analysis			
☐	Received Outside Range [Exception]*			
☐	Insufficient Ice or Unknown			
☐	Excessive Free Liquid			
	Completed COCs Received with Sample(s)	☑	☐	
	Correct Container(s) Preserve for Analysis	☑	☐	
	Container(s) Intact and Good Condition	☑	☐	
	Container Label(s) Consistent with COC	☑	☐	
	OEC Preservation Added**	☐	☑	
	Sample Quantity Sufficent	☑	☐	

Containers, COC Changes, And/Or Corrections

Cotaniner ID (COC)	Container Description	Home	Matrix	Preservative	pH/Chlorine /Sulfur	Comments
01A	40mL VOA	Fridge 3	Water			
						VOA Container Free of Headspace
01B	40mL VOA	Fridge 3	Water			
						VOA Container Free of Headspace

Receipt Login By:
DA-12/18/24 02:13

Receipt Reviewed By:
MLS-12/23/24 09:32

Oilfield Environmental & Compliance, Inc.

307 Roemer Way Suite 300, Santa Maria, CA 93454
Phone: (805) 922-4772 Fax: (805) 925-3376 www.oecusa.com
101 Adkisson Way, Taft, CA 93268 Phone: (661) 762-9143

OEC Work Order (Lab Use Only): 2411696

CHAIN OF CUSTODY

Rev 07/13/2020

Company: DCOR, LLC	Project Name / No: Platform Gale Waste Water Sump
Address: 1000 Town Center Drive, Suite 600, Oxnard, CA 93036	Site: Platform Gale / PO #:
Phone: (805) 535-2000 / Email: jrao@dcorllc.com	Comments:
Report To: Jay Rao / Sampler (Print): Keith Garcia	

Report Format(s): PDF(std) ☑ EDD ☐ EDF(i) ☐ WellSTAR(i) ☐ LTS(i) ☐
OTHER (Custom) EDD ☐
(i) EDF Global ID/Log Code, LTS(SDWIS) PWS WellSTAR Facility / API# / Entity#

Requested Turnaround Time [TAT] (Surcharges apply to any TAT other than 'Standard'):
ASAP ☐ 1 Day ☐ 2 Day ☐ 3 Day ☐ 5 Day ☐ Standard ☑

* (DW=drinking, GW=ground, PW=produced, WW=waste) waters, A=air/vapor, P=product/oil, S=solid/sediment

Lab Use Only	Date/Time Sampled	Matrix*	# of Cont.	Sample ID	Analysis Requested: ROC-8260	Special Instructions: All requests subject to OEC Terms & Conditions
01	12.17.24 / 13:15	Water	2	Platform Gale Waste Water	X	
						4.2

Relinquished by (Signature):	Relinquished by (Print Name & Company):	Date & Time:	Received by (Signature):	Received by (Print Name & Company):
[signature]	Keith Garcia DCOR	12.18.24 12:16	[signature]	[signature]

Engine Data For Gail Crane Engines:

North Crane

Manufacturer: Caterpillar

Model No.: API-100

S/N: A2H5-3351

Engine Location: Gail North Crane

South Crane

Manufacturer: Caterpillar

Model No.: API-1500

S/N: API-76H5-334

Engine Location: Gail South Crane

Summary of Maintenance is attached.

CRANE SERVICE TICKET

DATE	11-19-2024	SERVICE TECH	Hartman
PLATFORM	Gail	BILLING CODE	
CRANE MODEL	API-100	CRANE SN#	A2H5-3351
TIME IN/OUT			

Change engine oil
Change oil filter
Change fuel filter
Change air filter

SERVICE TECH	Dill	CRANE HRS	236.9
SERVICE TECH			

DATE		SERVICE TECH	
PLATFORM		BILLING CODE	
CRANE MODEL		CRANE SN#	
TIME IN/OUT			

SERVICE TECH		CRANE HRS	
SERVICE TECH			

CRANE SERVICE TICKET

DATE	11-20-2024	SERVICE TECH	Linton
PLATFORM	Gail	BILLING CODE	
CRANE MODEL	API-1500	CRANE SN#	API-76H5-334
TIME IN/OUT			

Change engine oil
Change engine oil filters
Change fuel filters

Air filters in good condition

SERVICE TECH	Dill	CRANE HRS	1810.7
SERVICE TECH			

DATE		SERVICE TECH	
PLATFORM		BILLING CODE	
CRANE MODEL		CRANE SN#	
TIME IN/OUT			

SERVICE TECH		CRANE HRS	
SERVICE TECH			

Chevron **LubeWatch®**

UIN 0AF2311

Generator

Unit No. Gail Emer Generator

Unit:
Make Blue Star
Model
Serial No.
Site

Compartment:
Name Generator
Make
Model
Serial No.
Capacity: gal

Customer:
DCORLLC PLATFORM GAIL
5661 Carpinteria Ave
Carpinteria CA 93013
USA

DIAGNOSIS

All wear levels appear within acceptable limits for first sample. Silicon level (dirt/sealant material) satisfactory. Water content acceptable. Fuel dilution satisfactory. Viscosity within specified operating range. Action: Resample at next recommended interval to monitor and establish wear trend.

ANALYST: roldan.beldad

Normal

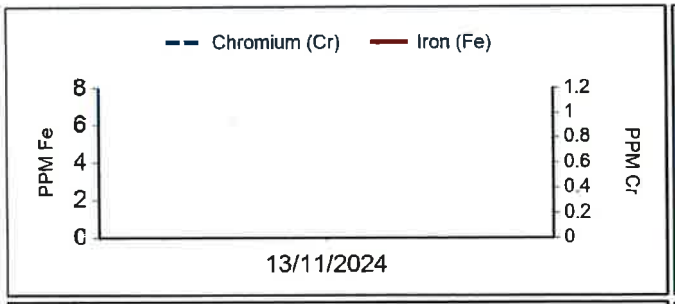
LEGEND: Severe | Abnormal | Caution | Normal

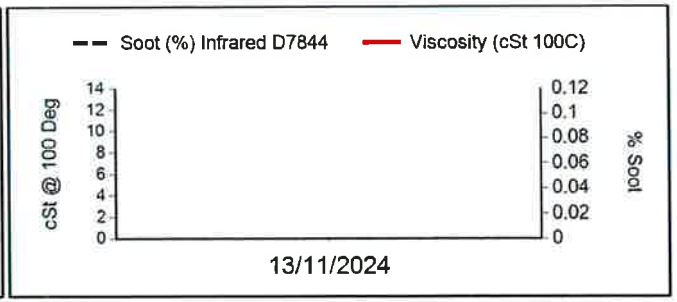
(800) LUBE-808

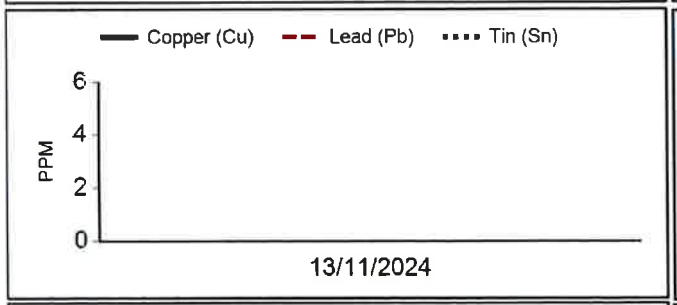
DATE SAMPLED	13-Nov-24
DATE RECEIVED	14-Nov-24
DATE REPORTED	15-Nov-24
LAB NO.	44023497161
SIF NO.	704715642
TIME ON UNIT	
TIME ON OIL	
OIL BRAND	Chevron
OIL TYPE	Delo 400
OIL GRADE	SAE 15W40
OIL ADDED	
FILTER	Not Applicable
OIL CHANGED	
WO NUMBER	
Metals (ppm)	
Iron (Fe)	6
Chromium (Cr)	<1
Lead (Pb)	<1
Copper (Cu)	5
Tin (Sn)	<1
Aluminium (Al)	2
Nickel (Ni)	<1
Silver (Ag)	<1
Titanium (Ti)	<1
Vanadium (V)	<1
Contaminants (ppm)	
Silicon (Si)	5
Sodium (Na)	2
Potassium (K)	3
Water (%)	<0.05
Coolant	No
Additives (ppm)	
Magnesium (Mg)	520
Calcium (Ca)	1461
Barium (Ba)	2
Phosphorus (P)	858
Zinc (Zn)	932
Molybdenum (Mo)	28
Boron (B)	98
Physical Tests	
Viscosity (cSt 100C)	13.7
Fuel (%)	<1
Soot (%) Infrared D7844	<0.1
Physical / Chemical	
Oxidation (Abs/0.1mm) E2412/D7414	13

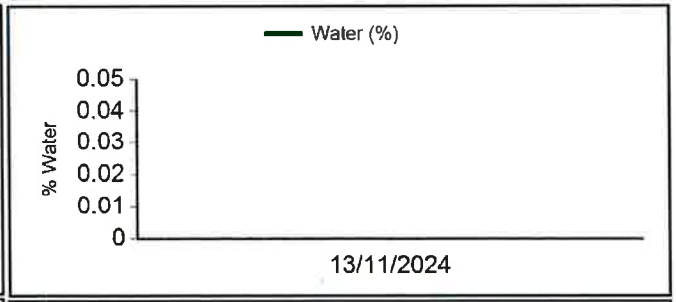
Chevron **LubeWatch®**

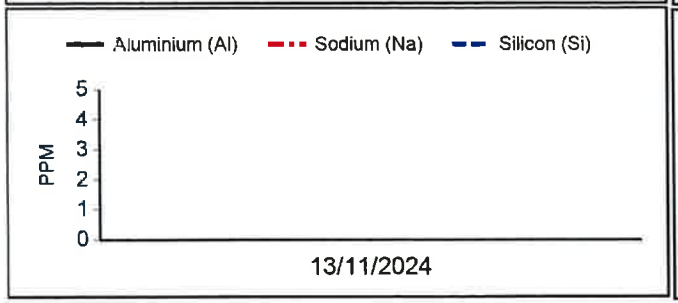
(800) LUBE-808











Filter Image

Filter patch test is not performed Contact laboratory for more information

Since services are based on samples and information supplied by others, and since corrective actions, if any, are necessarily taken by others, these services are rendered without any warranty or liability of any kind beyond the actual amount paid to ALS Tribology for the services. Reported recommendations are based on interpretations of the generated test results and historical data. Certain test results appearing in this report may have been tested at other ALS laboratories within the Tribology divisional network.

DCORLLC Cranes
Attn: Francisco Torres
5661 Carpinteria Ave
Carpinteria CA 93013
USA

0004 v1.8

UIN 0AF2311

U.S. Laboratories

Atlanta, Georgia - 420
5300 OakBrook Parkway
Building 200 Suite 245
Norcross, GA 30093
800.394.3669

Valley View, Ohio - 410
6180 Halle Dr. Suite D
Valley View, OH 44125
800.726.5400

Kansas City, Kansas - 430
935 Sunshine Road
Kansas City, KS 66115
800.332.8055

Phoenix, Arizona - 440
3319 West Earll Drive
Phoenix, AZ 85017
800.445.7930

Portland, Oregon - 401
4943 NW Front Avenue
Portland, OR 97210
800.770.4128

Canadian Laboratories

Burlington, Ontario - 450
5036 South Service Rd.
Burlington, ON L7L5Y7
905 332 9559

Edmonton, Alberta - 402
9450 17 Ave NW
Edmonton, AB T6N 1M9
+1 (780) 483-1036

Sales & Marketing

Houston, Texas
10450 Stancliff Road, Suite 210
Houston, TX 77099
877.835.8437

International Locations

Australia
Brisbane, Perth, Sydney, Muswellbrook

South America
Santiago de Chile, Belo Horizonte, Brazil

New Zealand
Wellington

Southeast Asia
Kuala Lumpur, Singapore

Europe
Prague

TEST METHODS:

Acid Number:	ASTM D974/D664 (*M)
Base Number:	ASTM D4739 (*M)
Base Number (Perchloric):	ASTM D2896B, back (*M)
Fuel Dilution by GC:	ASTM D7593
Fuel Dilution Visc/Setaflash	In House
Fuel Soot ATR/IR:	ASTM D7686 (*M)
Soot by FTIR:	ASTM D7844
Glycol:	In House
Metals by ICP AES:	ASTM D5185 (*M)
Ox, NOx, SOx, FTIR:	ASTM E2412/D7418/D7414 D7415
PQ Index:	ASTM D8120 (*M)
Particle Count:	ASTM D7647 (*M) / ISO 4406
Kinematic Viscosity:	ASTM D445 (*M) / D7279 (*M)
Water KF:	D6304 / E203 (*M)
Water Crackle:	In House

*M - Modified Method

Annual Diesel Engine Service and Inspection

Location **Platform Gail** Date **8/13/2024**

Equipment ID **K-13 Sullair air compressor**

1	X	Change engine oil — If sampled, recerence # N/A
2	S	FILL DIESEL TANK TO REUCE CONDENDATION. **(CARB DIESEL ONLY)**
3	S	CHECK COOLANT LEVELS.
4	N/A	CHECK ENGINE BLOCK HEATER FOR WARMTH (IF EQUIPED)
5	S	CHECK BATTERY CONDITION, POST, LEVEL. — RECORD VOLTS _____
6	N/A	LUBRICATE FAN BEARINGS (IF EQUIPED)
7	S	INSPECT ALL HOSES AND BELTS FOR WEAR
8	X	CHANGE OIL FILTER(S)
9	X	CHANGE FUEL FILTER(S)
10	X	INSPECT AIRFILTER AND CLEAN, CHANGE IF REQUIRED
11	N/A	CHECK VALVE ADJUSTMENTS, INTAKE AND EXHAUST (IF REQUIRED)
12	S	LUBRICATE THE TACHOMETER DRIVE (IF EQUIPED)
13	S	CHECK ENGINE COOLANT, IF ACIDIC, SCHEDULE CHANGE
14	S	INSPECT RADIATOR CORE, CAP, AND OVERFLOW TANK FOR LEAKAGE
15	S	RUN ENGINE HALF HOUR, CHECK FILTERS, RADIATOR, AND FUEL SYSTEM FOR LEAKS
16	S	RECORD ENGINE HOURS — START 111.6 — END 112.2

S= SATIFSACTORY N/A= NPT APPLICABLE X=RCV;D ATTENTION O=NEEDS ATTENION

SERVICED PREFORMED BY Chad Highland

SEND COPY OF COMPLETED FORM TO: hcollins@dcorllc.com

Annual Diesel Engine Service and Inspection

Location Plt. Gail Date 10/15/2024

Equipment ID Generator

1	S	Change engine oil — If sampled, recerence # 704715642
2	S	FILL DIESEL TANK TO REUCE CONDENDATION. **(CARB DIESEL ONLY)**
3	S	CHECK COOLANT LEVELS.
4	N/A	CHECK ENGINE BLOCK HEATER FOR WARMTH (IF EQUIPED)
5	S	CHECK BATTERY CONDITION, POST, LEVEL. — RECORD VOLTS 12.8
6	N/A	LUBRICATE FAN BEARINGS (IF EQUIPED)
7	S	INSPECT ALL HOSES AND BELTS FOR WEAR
8	X	CHANGE OIL FILTER(S)
9	X	CHANGE FUEL FILTER(S)
10	S	INSPECT AIRFILTER AND CLEAN, CHANGE IF REQUIRED
11	N/A	CHECK VALVE ADJUSTMENTS, INTAKE AND EXHAUST (IF REQUIRED)
12	N/A	LUBRICATE THE TACHOMETER DRIVE (IF EQUIPED)
13	S	CHECK ENGINE COOLANT, IF ACIDIC, SCHEDULE CHANGE
14	S	INSPECT RADIATOR CORE, CAP, AND OVERFLOW TANK FOR LEAKAGE
15	S	RUN ENGINE HALF HOUR, CHECK FILTERS, RADIATOR, AND FUEL SYSTEM FOR LEAKS
16		RECORD ENGINE HOURS — START 11:45 END 11:55

S= SATIFSACTORY N/A= NPT APPLICABLE X=RCV;D ATTENTION O=NEEDS ATTENION

SERVICED PREFORMED BY Chad Highland

SEND COPY OF COMPLETED FORM TO: hcollins@dcorllc.com

Gail 2024 Vessel Fuel Usage (with Crew Boat and Supply/Work Boat Allocations)

Gail
Vessel Fuel Usage

	Crew	Supply	
Jan-24	73	18	Ledger T
Feb-24	0	8	Danny C
Mar-24	73	18	Ledger T
Apr-24	47	12	Capt T Le
May-24	19	5	Ledger T
Jun-24	47	12	Alan T
Jul-24	87	17	Alan T
Aug-24	49	0	Ledger T
Sep-24	123	31	Ledger T
Oct-24	80	20	Nicholas L
Nov-24	380	112	Nicholas L
Dec-24	1,091	234	Nicholas L

Fuel (Diesel) Consumption and Emissions

	2024														
Equipment/Emission Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	12-month total	Permit Limit	12-Month and Permit Limit Units
North Crane	0	0	0	32	32	32	32	3	0	3	12	15	161		Gallons
South Crane	0.5	0	0	0	0	12	12	1	0	1	1	2	29.5		Gallons
Monthly Crane Sub-Total	0.5	0	0	32	32	44	44	4	0	4	13	17	190.5	21339	Gallons
Crane rolling 12-month total	18378.5	16414.5	14373.5	13008.5	10878.5	8316.5	5039.5	2525.5	1487.5	771.5	200.5	190.5			Gallons
Crane Emissions															
ROC	0.000008	0.000000	0.000000	0.000530	0.000530	0.000729	0.000729	0.000066	0.000000	0.000056	0.000215	0.000282	**0.003158**	**0.35**	Tons/yr at 33.15 lbs/Mgal
NOx	0.000140	0.000000	0.000000	0.008976	0.008976	0.012342	0.012342	0.001122	0.000000	0.001122	0.003647	0.004769	**0.053435**	**4.99**	Tons/yr at 561.00 lbs/Mgal
PM	0.000008	0.000000	0.000000	0.000536	0.000536	0.000737	0.000737	0.000067	0.000000	0.000067	0.000216	0.000285	**0.003191**	**0.36**	Tons/yr at 33.50 lbs/Mgal
SOx	0.000002	0.000000	0.000000	0.000120	0.000120	0.000165	0.000165	0.000015	0.000000	0.000015	0.000049	0.000064	**0.000714**	**0.08**	Tons/yr at 7.50 lbs/Mgal
CO	0.000026	0.000000	0.000000	0.001632	0.001632	0.002244	0.002244	0.000204	0.000000	0.000204	0.000663	0.000867	**0.009716**	**1.09**	Tons/yr at 102.00lbs/Mgal
Crew Boat Fuel	73	0	73	47	19	47	87	49	123	80	380	1091	2069		Gallons
Work Boat Fuel	18	8	18	12	5	12	17	0	31	20	112	234	487		Gallons
Monthly Boat Sub-Total	91	8	91	59	24	59	104	49	154	100	492	1325	2556	353100	Gallons
Boat rolling 12-month total	24732	22010	18032	14659	14664	12264	10476	8192	4852	2378	253	487			Gallons
Crew Boat Emissions															
ROC	0.001210	0.000000	0.001210	0.000779	0.000315	0.000779	0.001442	0.000812	0.002039	0.001326	0.006299	0.018083	**0.034294**	**0.34**	Tons/yr at 33.15 lbs/Mgal
NOx	0.020477	0.000000	0.020477	0.013184	0.005330	0.013184	0.024404	0.013745	0.034502	0.022440	0.106590	0.306026	**0.580355**	**6.42**	Tons/yr at 561.00 lbs/Mgal
PM	0.001223	0.000000	0.001223	0.000787	0.000318	0.000787	0.001457	0.000821	0.002060	0.001340	0.006365	0.018274	**0.034656**	**0.31**	Tons/yr at 33.50 lbs/Mgal
SOx	0.000274	0.000000	0.000274	0.000176	0.000071	0.000176	0.000326	0.000184	0.000461	0.000300	0.001425	0.004091	**0.007759**	**0.2**	Tons/yr at 7.50 lbs/Mgal
CO	0.003723	0.000000	0.003723	0.002397	0.000969	0.002397	0.004437	0.002499	0.006273	0.004080	0.019380	0.055641	**0.105519**	**3.05**	Tons/yr at 102.00lbs/Mgal
Work Boat Emissions															
ROC	0.000298	0.000133	0.000298	0.000189	0.000083	0.000199	0.000282	0.000000	0.000514	0.000332	0.001856	0.003879	**0.008072**	**1.91**	Tons/yr at 33.15 lbs/Mgal
NOx	0.005049	0.002244	0.005049	0.003366	0.001403	0.003366	0.004769	0.000000	0.008695	0.005610	0.031416	0.065637	**0.136604**	**36.29**	Tons/yr at 561.00 lbs/Mgal
PM	0.000302	0.000134	0.000302	0.000201	0.000084	0.000201	0.000285	0.000000	0.000519	0.000335	0.001876	0.003920	**0.008157**	**1.72**	Tons/yr at 33.50 lbs/Mgal
SOx	0.000068	0.000030	0.000068	0.000045	0.000019	0.000045	0.000064	0.000000	0.000116	0.000075	0.000420	0.000878	**0.001826**	**1.13**	Tons/yr at 7.50 lbs/Mgal
CO	0.000918	0.000408	0.000918	0.000612	0.000255	0.000612	0.000867	0.000000	0.001581	0.001020	0.005712	0.011934	**0.024837**	**17.24**	Tons/yr at 102.00lbs/Mgal
Total Emissions															
ROC	0.001517	0.000133	0.001508	0.001508	0.000928	0.001707	0.002453	0.000878	0.002553	0.001724	0.008370	0.022244	**0.045523**	**2.6**	Tons/yr at 33.15 lbs/Mgal
NOx	0.025666	0.002244	0.025526	0.025526	0.015708	0.028892	0.041514	0.014867	0.043197	0.029172	0.141653	0.376431	**0.770393**	**47.7**	Tons/yr at 561.00 lbs/Mgal
PM	0.001533	0.000134	0.001524	0.001524	0.000938	0.001725	0.002479	0.000888	0.002580	0.001742	0.008459	0.022479	**0.046004**	**2.39**	Tons/yr at 33.50 lbs/Mgal
SOx	0.000343	0.000030	0.000341	0.000341	0.000210	0.000386	0.000555	0.000199	0.000578	0.000390	0.001894	0.005033	**0.010299**	**1.41**	Tons/yr at 7.50 lbs/Mgal
CO	0.004667	0.000408	0.004641	0.004641	0.002856	0.005253	0.007548	0.002703	0.007854	0.005304	0.025755	0.068442	**0.140072**	**21.38**	Tons/yr at 102.00lbs/Mgal

Letter of Conformance

January 1, 2025

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, 2024 to December 31, 2024

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,

Kayla Torres

Kayla Torres
Business Development Manager
(714) 493-1005
torresk@scfuels.com

Opacity:

No occurrences of visible emissions not meeting rule 50 opacity requirements in 2024 (Jan. 1 – Dec. 31).

Solvent Use:

No solvents used at Gail in 2024 (Jan. 1 – Dec. 31).

Abrasive Blasting:

No abrasive blasting performed at Gail in 2024 (Jan. 1 – Dec. 31).