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May 20, 2010

Mr. Keith Duval
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

**Re: Part 70 Annual Compliance Certification Report for Platform Grace -
Reporting Period of April 1, 2009 through March 31, 2010**

Dear Mr. Duval:

Pursuant to the requirements of the Title V Part 70 Federal Operating Permit No. 1493, Venoco, Inc. is submitting the Platform Grace Part 70 Annual Compliance Certification Report for the reporting period of April 1, 2009 through March 31, 2010.

If you have questions or need additional information, please call me at (805) 745-2264.

Sincerely,

Patrick T. Corcoran
Environmental Coordinator

Encl.

Cc: Gerardo Rios, U.S. EPA Region 9



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:

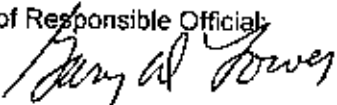
Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

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: OPERATIONS MANAGER	Date: May 20, 2010
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Time Period Covered by Compliance Certification <u>04/01/2009</u> (MM/DD/YY) to <u>03/31/2010</u> (MM/DD/YY)



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

A. Attachment # or Permit Condition #: 71.1N1	D. Frequency of monitoring: Quarterly
B. Description: Tanks that are equipped with vapor recovery	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Fugitive I&M Program under Rule 74.10 for the tank hatches and other inlet and outlet gas and liquid piping connections; storage tank vapor recovery system for each applicable tank is monitored on a quarterly basis. Annual compliance certification verifying tanks are equipped with vapor recovery.	F. Currently In Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 71.4N3	D. Frequency of monitoring: Annually
B. Description: Sumps, pits, or ponds exempt from being required to have a cover which is impermeable to ROC vapors, and covers at least 90% of the liquid surface area; Low ROC 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 laboratory analysis by EPA Method 8015 showing tank ROC content is < 5mg/l. See attached ROC analytical results for T-2 and T-13.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.9N3	D. Frequency of monitoring: Biennial Source Tests
B. Description: Stationary Natural Gas-Fired Rich-Burn I C Engines – NO _x , ROC, and CO emission limits after January 1, 1997.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable ARB Method 100, EPA Method 25
C. Method of monitoring: Biennial source test of the generator engines . Engine inspections per the Engine Operator Inspection Plan.	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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

<p>A. Attachment # or Permit Condition #: 74.9N7</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Emergency Standby Stationary Internal Combustion Engines Operated During Either an Emergency or Maintenance Operation</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Records of operating hours. Date, time, duration, and reason for emergency operation. Records of engine data. Compliance is determined by logged hours of annual operation to ensure less than 50 hours per year.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 74.9N8</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Stationary diesel-fired internal combustion engines with permitted capacity factor of 15% or less.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Records containing data for each engine verifying the manufacturer's specified maximum hourly fuel consumption, data specifying the actual annual usage (e.g., fuel consumption or operating hours), and data for each engine including the engine manufacturer, model no., operator identification no., and location of each engine.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 74.9N9</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Stationary diesel-fired internal combustion engines used to power cranes and welding equipment</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Records containing data for each engine including the function (usage) of the engine, manufacturer, model number, operator identification number, and location of each engine. Routine surveillance of the diesel-fired engine to ensure that compliance is being maintained.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

<p>A. Attachment # or Permit Condition #: ATCM ENG.N3</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: All stationary compression ignition engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual certification that monthly fuel consumption records and fuel type records are maintained. ATCM omission standards are not federally enforceable.</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 #: PO1493PC1-Condition No. 1</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Platform Grace 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.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>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.</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 #: PO1493PC1-Condition No. 2</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Platform Grace Additional Requirements - Generators shall only burn natural gas and no other fuel.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Routine surveillance to ensure only natural gas is used. Annual compliance that only natural gas was burned in generators.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

A. Attachment # or Permit Condition #: PO1493PC1-Condition No. 3	D. Frequency of monitoring: Periodic
B. Description: Platform Grace Additional Requirements - Maximum number of oil wells (16). Platform Grace currently has 11 oil well completions.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Authority to Construct will be obtained prior to drilling any wells, unless the activity is a redrill. Annual compliance certification that there was no increase in number of wells for this reporting period.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO1493PC1-Condition No. 4	D. Frequency of monitoring: Periodic
B. Description: Platform Grace Additional Requirements - Maximum sulfur content of diesel fuel consumed in the crane engines, G-5B turbine starter engines, Generators, backup generator engine, 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): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO1493PC1-Condition No. 5	D. Frequency of monitoring: Periodic
B. Description: Platform Grace Additional Requirements - Crew boat and work boat 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 rolling data.	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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

<p>A. Attachment # or Permit Condition #: PO1493PC1-Condition No. 6</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Platform Grace Additional Requirements - Crew boat permitted engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Only one crew boat 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.</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 #: PO1493PC1-Condition No. 7</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Platform Grace Additional Requirements - Work boat permitted engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Only one work boat 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.</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 #: PO1493PC1-Condition No. 8</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Platform Grace Additional Requirements - Solvent Recordkeeping</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>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.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

A. Attachment # or Permit Condition #: PO1493PC2-Conditions Nos. 1 and 4	D. Frequency of monitoring: Periodic
B. Description: Flare fuel consumption	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Each flare has individual fuel meter installed to record the amount of natural gas consumed. Monthly records of volume of gas combusted in flare are maintained in 12-month rolling records. Records also differentiate between emergency (unplanned) usage and non-emergency (planned) usage. Annual compliance certification that these records are maintained. See attached 12-month rolling data.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO1493PC2-Conditions Nos. 2 and 3	D. Frequency of monitoring: Monthly
B. Description: Flare ignition system operation – each flare is equipped and maintained with a continuous pilot or autoignition system to ensure combustion disposal of all excess produced or recovered gases.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Flare's ignition system is tested monthly and monthly records of the flare's ignition system tests and maintenance activities are maintained. Annual compliance certification that these records are maintained.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO1493PC3	D. Frequency of monitoring: Periodic
B. Description: Caterpillar Diesel Backup Generator operation.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual compliance certification that the backup generator G-02 is only operated during maintenance testing or when production generators mechanically malfunctioning. Records indicating reason for usage are maintained. Annual compliance certification that records are maintained.	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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

A. Attachment # or Permit Condition #: PO1493PC4	D. Frequency of monitoring: Periodic
B. Description: Tanks designated as out of service on the permit are shut down and cannot be operated.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual compliance certification that Tanks T-4, T-6, T-10, T-21A, T-21B, T-23, T-25, and T-22 have been shut down and had not been operated during this compliance period.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO1493PC5	D. Frequency of monitoring: Biennial
B. Description: Stationary Natural Gas-Fired Rich-Burn I C Engines – BACT NO _x , ROC, and CO emission limits. CAM Requirements	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable ARB Method 100, EPA Method 25
C. Method of monitoring: Biennial source test of the G-03 generator using: ARB Method 100 for NO _x , ARB Method 100 for CO, EPA Method 25 or EPA Method 18 for ROC, ARB Method 100 for oxygen content, and ASTM Method 1826-77 for gaseous fuel heating value. Annual compliance certification that daily NO _x measurements utilizing a portable analyzer are being recorded. Daily portable analyzer readings are attached.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO1493PC6	D. Frequency of monitoring: Annual
B. Description: Crane fuel consumption	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Monthly records of crane fuel consumption are maintained in 12-month rolling records. Annual compliance certification that these records are maintained. See attached rolling 12-month data.	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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

<p>A. Attachment # or Permit Condition #: 50</p>	<p>D. Frequency of monitoring: Annually</p>
<p>B. Description: Opacity requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>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.</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 #: 52</p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: Particulate Matter – Concentration requirements (grain loading)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual compliance certification that particulate matter was not discharged into the atmosphere from any source at the facility in excess of the concentration listed in the table shown in Rule 52. Periodic monitoring is not necessary to certify compliance.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

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

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

A. Attachment # or Permit Condition #: 64.B.1	D. Frequency of monitoring: Annually
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 fuel analysis of the total sulfur content measured as hydrogen sulfide using SCAQMD Method 307-94.	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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

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

A. Attachment # or Permit Condition #: 71.1.C	D. Frequency of monitoring: Quarterly
B. Description: Emissions of produced gas must be controlled at all times using a gas collection system that directs all gas to a fuel or sales gas system, or to a flare that combusts ROCs.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Fugitive I&M Program under Rule 74.10 for the gas collection system's gas and liquid piping connections; Annual compliance certification that the produced gas collection system is a closed system through a visual inspection. Flare is inspected on a quarterly basis. Records of visual and flare inspections are maintained at the facility.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 71.4.B.1	D. Frequency of monitoring: None
B. Description: First stage sump prohibition	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual certification that there are no first stage production sumps at the facility.	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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

<p>A. Attachment # or Permit Condition #: 71.4.B.3</p>	<p>D. Frequency of monitoring:</p> <p>None</p>
<p>B. Description:</p> <p>Well cellar storage prohibition</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>Annual certification including routine surveillance and visual inspections that no crude oil or petroleum material was stored in a well cellar except during periods of equipment maintenance or well workover, and in no case, no storage for more than 5 days. No well cellars are on Platform Grace.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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

<p>A. Attachment # or Permit Condition #: 74.10</p>	<p>D. Frequency of monitoring:</p> <p>Daily, Weekly, Quarterly, Annually</p>
<p>B. Description:</p> <p>Fugitive leak and leak inspection requirements for components at crude oil production and processing facilities.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p> <p>Weekly visual inspections of pumps, Daily, Weekly, Quarterly monitoring of specified components. All other components not exempt are monitored annually. Detected leaks are visibly tagged. Annual update to Operator Management Plan. Notification of major leaks and repeat leaks.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

<p>A. Attachment # or Permit Condition #: <u>74.11.1</u></p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: Large Water Heaters and Small Boilers</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual certification that Platform Grace does not have any applicable units.</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 #: <u>74.22</u></p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: Natural gas-fired, fan-type central furnaces – NO_x limits and certification requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual certification that Platform Grace does not have any applicable units.</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 #: <u>74.1</u></p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Abrasive blasting requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Routine surveillance including assuring that visual inspections, operation, equipment and recordkeeping requirements are being met,.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 09 to 03 / 31 / 10

A. Attachment # or Permit Condition #: 74.2	D. Frequency of monitoring: Periodic
B. Description: Architectural coating 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): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.16	D. Frequency of monitoring: None
B. Description: Oilfield Drilling Operations	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual compliance certification to ensure the use of electric power or that drilling engines have valid APCD PTO. Annual source tests or manufacturer certification.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 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): <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

Engine DATA

- CAM
- Maintenance
- ST DATA



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 09 (MM/DD/YY) to 03 / 31 / 10 (MM/DD/YY)

A. Emission Unit Description: Generator G-1A			B. Pollutant: NOX
C. Measured Emission Rate: 1.6 ppmv @ 15% O ₂	D. Limited Emission Rate: 5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012	F. Test Date: 01/13/2010

A. Emission Unit Description: Generator G-1A			B. Pollutant: CO
C. Measured Emission Rate: 13 ppmv @ 15% O ₂	D. Limited Emission Rate: 71 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012	F. Test Date: 01/13/2010

A. Emission Unit Description: Generator G-1A			B. Pollutant: ROC
C. Measured Emission Rate: <0.5 ppmv @ 15% O ₂	D. Limited Emission Rate: 14 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012	F. Test Date: 01/13/2010

A. Emission Unit Description: Generator G-1B			B. Pollutant: NOX
C. Measured Emission Rate: 0.9 ppmv @ 15% O ₂	D. Limited Emission Rate: 5 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012	F. Test Date: 01/13/2010

A. Emission Unit Description: Generator G-1B			B. Pollutant: CO
C. Measured Emission Rate: 8.7 ppmv @ 15% O ₂	D. Limited Emission Rate: 71 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012	F. Test Date: 01/13/2010



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 09 (MM/DD/YY) to 03 / 31 / 10 (MM/DD/YY)

A. Emission Unit Description: Generator G-1B		B. Pollutant: ROC	
C. Measured Emission Rate: <0.5 ppmv @ 15% O ₂	D. Limited Emission Rate: 14 ppmv @ 15% O ₂	E. Specific Source Test or Monitoring Record Citation: AIR-X Job # 22012	F. Test Date: 01/13/2010

ENGINE DATA FOR THE CATERPILLAR ENGINE (G-1A)

Engine Manufacturer: Caterpillar

Model No.: G-399 SI-TA HCR

Serial No.: SVA0058

Engine Location: Turbine room, southwest corner of platform, production deck

Summary of Maintenance and Testing Reports are Included for the Following:

- Service records are attached.

Source Test Report: Please refer to the last source test conducted on 01/13/2010. This report was previously submitted to the District. Enclosed are summary of results.

Service Report



3500 Sheppard St., Whittier, CA 90601

562-463-6000

Customer	VENOCO PLATFORM "GRACE"		
Site	Carpentaria work Pier		
Date	12-7 & 8-09	Job Number	WX25386
Engine MFG	CAT	Generator MFG	CAT
Engine M/N	G399S1	Generator M/N	1200RPM
Engine S/N	49C0102 & 0128	Generator S/N	
Engine AR#		Generator AR#	4160VAC
Unit Hours	5223/5255	Technician	Jim Magnuson 8194

Part Number	Part Name	Qty	Desc Code	Group Number	Group Name	Product Inoperable?	Descriptive Comments (20 Spaces Max)
						Y N	
						Y N	
						Y N	
Description Codes	A-Structural B-Surface	C-Leaks D-Factory Assembly	E-System Malfunction F-Factory Shipping	G-General Repair H-Adjustment	K-Servicability M-Abuse	X-Operation Complaint	

- T/S as needed to get units 1a and 1b back on line

- 1) 12-7-09 Left for customer jobsite and was turned around approximately 1/2 way to pier for lack of shore boat availability.
- 2) 12-8-09 Traveled to customer jobsite, offloaded equipment to pier and checked in with security. Watched required safety video and boarded shore boat. Off loaded at platform and checked in with platform manager. Completed required platform orientation and safety procedures. Reviewed customer complaints with operations engineer.
- 3) GE489 power quality monitor had locked out unit 1B at the switchgear for a "phase differential fault". Reviewed platform load demands and noted in less than 1 hour of observation that phase "B" load imbalance varied from 5%-25% and at one point caused a voltage dip which effected power on the entire platform. Was able to verify that the high current in phase "B" was not being cause thru the emergency circuits as they have there own monitoring and the anomaly was not noted on that panel. To keep the platform on line it was decided that the parameters with in the switchgear needed to be opened up to prevent nuisance shut downs until the platform can be properly repaired. Changed the phase differential shut down value from 10% to 25%, although this unit runs thru a primary transformer it only shut down as it was programmed to do to protect the platform. These parameters should be

Customer

Technician

Service Report

OLIMPI CAT

3500 Shepherd St., Whittier, CA 90601

562-263-6000

- returned to 10% ASAP after the load imbalance is located and corrected. Put unit on line and monitored, all OK.
- 4) Unit 1A- Found this unit partially disassembled. Completed MEGGAR testing of windings and noted all windings were within specs of 1 mega ohm or higher. Testing of PMG stator removed by customer showed a failed coil. Found PMG wiring connections were wrong. Corrected after testing, secured all wiring as needed. Found unit would not start after reassembly, traced to AFCR control parameters had been zeroed during repairs. Re-installed base parameters and started unit, all output values were within normal specs. After unit came to normal operating temps unit was paralleled with 1B and put on line, all OK. Placed platform loads onto unit 1A and took 1B offline. Reviewed all repairs with onsite personnel.
- 5) Loaded equipment to next available shore boat and off loaded at pier. Return travel and complete reports

Customer

Technician

**PLATFORM GRACE
GENERATOR SERVICE**

DATE; 12/17/09 UNIT; G-1A

HOURS; 5392

MECHANIC: J. Payne

1500 HOUR SERVICE

REPLACE SPARK PLUGS: YES NO
COMMENTS: _____

CHANGE & CLEAN OIL FILTERS: YES NO
COMMENTS: _____

CHANGE CRANK CASE OIL: YES NO
COMMENTS: _____

REPLACE AIR FILTER: YES NO
COMMENTS: _____

REMOVE, BLOW OUT AND TURN CATALYST ELEMENTS: YES NO
COMMENTS: _____ Replaced elements

3000 HOUR SERVICE

ACID CLEAN CATALYST ELEMENT: YES NO
COMMENTS: _____

REPLACE O2 SENSOR YES NO
COMMENTS: _____

ADDITIONAL MAINTENANCE

DATE: 12/17/09 HOURS: 5392 MECHANIC : J. Payne
COMMENTS: installed air filter pre-cleaners

Per APCD rules & regulation, 74.9, Stationary Internal Combustion Engine.

Service Report



3500 Shepherd St., Whittier, CA 90601

562-483-6000

Customer	VENOCO		
Site	VENTURA CA, PLATFORM GRACE		
Date	12/29/09	Job Number	W25386
Engine M/N	G399SITA	Generator M/N	SR4
Engine S/N	UNIT G1B 49C01028	Generator S/N	4160VOLT
Hours	5267	Technicians	David Jackson

Part Number	Part Name	Qty	Desc Code	Group Number	Group Name	Product Inoperable?	Descriptive Comments (20 Spaces Max)
						Y N	
						Y N	
						Y N	

Description Codes	A-Structural B-Surface	C-Leaks D-Factory Assembly	E-System Malfunction F-Factory Shipping	G-General Repair H-Adjustment	X-Serviceability N-Abuse	X-Operation Complaint
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- 1) Arrived on platform on 12/29/09 and met with representatives from Venoco Corp. Discussed nature of job with customer and was informed that the G1B unit had been shutting down on phase differential current.
- 2) I accessed the GE489 relay and inspected the trip points for the differential current and found that they were @ 25%xCT with slope 1 @ 10% and slope 2 @ 20% and time delay @ 0 cycles. This is what it was set at back on 12/8/09 by another technician that was out for high B phase current.
- 3) After accessing the GE489 recorded events I found that unit had incurred 170 events and the last 10 events dating from 12/6/09 through current were all related to phase differential trips. Found that the last event indicated that the (A or load) A phase current was at 47amps the B phase was at 50 amps and the C phase was at 50 Amps. Then found that the (NA or generator current) indicated A phase current @ 46 Amps the B phase was at 50 Amps and the C phase was at 0 Amps. This was a 50 differential at C phase.
- 4) I secured unit to off position and depressed the emergency stop button and installed a lock out tag out on the control panel assembly.
- 5) I then removed the covers from the generator housing to gain access to the CT'S and wire connections. I found that the wire connection on the C phase CT on X1 was broken at the terminal connection and no longer making connection.
- 6) I removed the broken wire connection from the C phase CT and repaired with new wire terminal I also replaced the connection terminal on the X2 connection with new.

Page 1 of 2

Customer

Technician

Service Report



3500 Shepherd St., Whittier, CA 90601

562-483-6000

- 7) I reinstalled the covers back on the generator assembly and removed the lock out tag out assembly from unit.
- 8) Had operator start unit allowing the G1B unit to reach operating temperature. Once unit achieved operating temperature operator placed the unit in parallel with the G1A unit. Found unit operation was normal with amps at A phase @ 12 B phase @14 and C phase @14. Operator then placed the G1A unit in cool-down stop mode and the remaining load shifted to the G1B unit. Found unit operation normal with load at 26 Amps on A phase 28 Amps on B phase and 27 Amps on C phase.
- 9) Operator cycled the fire pump on platform to add additional load to unit and found all three legs were @ 42 44 & 45 Amps. Operator left unit on line and I monitored system for the remainder of the day on site.
- 10) It appears that the customer has been incurring two problems on site one for phase differential on unit G1B that was a power generation issue and the other a load issue on the platform due to high current draw at times and not specific to any unit. Customer is working with an electrical engineering firm on the intermittent load issue.
- 11) Customer will continue to monitor the G1B unit for the remainder of the week to insure that the differential issue is resolved.

Complete 12/29/09

Page 2 of 2

Customer

Technician

**PLATFORM GRACE
GENERATOR SERVICE**

DATE; 1-31-09 UNIT: G-1A

HOURS; 3634

MECHANIC: Rickman

1500 HOUR SERVICE

REPLACE SPARK PLUGS: YES__ NO__
COMMENTS: _____

CHANGE & CLEAN OIL FILTERS: YES__ NO__
COMMENTS: _____

CHANGE CRANK CASE OIL: YES__ NO__
COMMENTS: _____

REPLACE AIR FILTER: YES__ NO__
COMMENTS: _____

REMOVE, BLOW OUT AND TURN CATALYST ELEMENTS: YES__ NO__
COMMENTS: _____

3000 HOUR SERVICE

ACID CLEAN CATALYST ELEMENT: YES__ NO__
COMMENTS: _____

REPLACE O2 SENSOR YES__ NO__
COMMENTS: _____

ADDITIONAL MAINTENANCE

DATE: HOURS: MECHANIC : Rickman

COMMENTS: Changed valve cover gasket #2 left side, stopped leak.

Per APCD rules & regulation, 74.9, Stationary Internal Combustion Engine.

G-1A

SERVICE

DATE: 2/17/10

HOURS: 6169

MECHANIC: Jeff Payne

WORK PERFORMED: Replaced both carburetors with new assemblies. Adjusted carburetors and MEC-R to comply with rule 74.9.

PARTS USED: 9Y-5306 RIGHT CARBURETOR

9Y-5307 LEFT CARBURETOR

Condition PQ11493PCS

**PLATFORM GRACE
399 CATERPILLAR GENERATOR ENGINE (G-1A)
DAILY CAM/RULE 74.9 MONITORING**

G-1A

Month: MAY

Year: 2009

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST		
Initial Reading (ppmv @ 15% O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)		Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
NOX	CO				NOX	CO	
1			Not in Service				
2			Not in Service				
3			Not in Service				
4			Not in Service				
5			Not in Service				
6			Not in Service				
7			Not in Service				
8			Not in Service				
9			Not in Service				
10			Not in Service				
11			Not in Service				
12			Not in Service				
13			Not in Service				
14			Not in Service				
15			Not in Service				
16			Not in Service				
17			Not in Service				
18			Not in Service				
19			Not in Service				
20			Not in Service				
21			Not in Service				
22			Not in Service				
23			Not in Service				
24			Not in Service				
25			Not in Service				
26			Not in Service				
27			Not in Service				
28			Not in Service				
29			Not in Service				
30			Not in Service				
31			Not in Service				

Condition PQ11493PC5

**PLATFORM GRACE
399 CATERPILLAR GENERATOR ENGINE (G-1A)
DAILY CAM/RULE 74.9 MONITORING**

G-1A

MONTH: July

YEAR: 2009

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Nox	CO	Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	CO	Time	Tester's Initials
1				Not in Service				
2				Not in Service				
3				Not in Service				
4				Not in Service				
5				Not in Service				
6				Not in Service				
7				Not in Service				
8				Not in Service				
9				Not in Service				
10				Not in Service				
11				Not in Service				
12				Not in Service				
13				Not in Service				
14				Not in Service				
15				Not in Service				
16				Not in Service				
17				Not in Service				
18				Not in Service				
19				Not in Service				
20				Not in Service				
21				Not in Service				
22				Not in Service				
23				Not in Service				
24				Not in Service				
25				Not in Service				
26				Not in Service				
27				Not in Service				
28				Not in Service				
29				Not in Service				
30				Not in Service				
31				Not in Service				

Condition FQ11493FC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1A)
 DAILY CAM/RULE 74.9 MONITORING

G-1A

Month: AUGUST

Year: 2009

G1-A

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS	SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15% O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	NOx	CO				CO	Time	
1	1	30	4:26					WC
2	1	44	6:03					WC
3	1	34	5:44					WC
4	0	18	5:06					WC
6	1	43	6:12					WC
8	4	38	6:07					WC
7	1	33	5:16					WC
8				Not In Service				
9				Not In Service				
10				Not In Service				
11				Not In Service				
12				Not In Service				
13				Not In Service				
14				Not In Service				
15				Not In Service				
16				Not In Service				
17				Not In Service				
18				Not In Service				
19				Not In Service				
20				Not In Service				
21				Not In Service				
22				Not In Service				
23				Not In Service				
24				Not In Service				
25				Not In Service				
26				Not In Service				
27				Not In Service				
28				Not In Service				
29				Not In Service				
30				Not In Service				
31				Not In Service				

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1A)
 DAILY CAM/RULE 74.9 MONITORING

G-1A

Month: SEPTEMBER

Year: 2008

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST		
Initial Reading (ppmv @ 15% O2)		Time	Corrective Actions Taken (in the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
Day	CO				CO	Time	
1	1	30	4:28				SM
2	1	44	6:03				WC
3	1	34	5:44				WC
4				Not in Service			WC
6	1	43	8:12				WC
8	4	38	5:07				WC
7	1	33	5:16				WC
8	1	31	5:50				WC
9	1	42	1:38				JP
10	1	16	2:04				JP
11	1	7	1:35				JP
12	1	9	2:44				JP
13	1	8	2:45				JP
14	1	14	1:41				JP
16	1	8	2:23				JP
16	1	73	4:59				WC
17	1	47	4:36				WC
18	1	81	4:59				WC
19	1	67	17:18				DA
20	1	63	8:13				WC
21	1	64	4:47				WC
22	1	75	6:01				WC
23	1	53	5:45				DG
24	1	50	2:50				DG
25	1	48	2:49				DG
26				Not in Service			
27				Not in Service			
28				Not in Service			
29				Not in Service			
30				Not in Service			
31				Not in Service			

**PLATFORM GRACE
773 WAUKESHA GENERATOR ENGINE (G-1A)
DAILY CAM/RULE 74.9 MONITORING**

G-1A

Month: MARCH

Year: 2010

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS			SECONDARY NOX/CO TEST		
Day	Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1				Stand By				
2				Stand By				
3				Stand By				
4				Stand By				
5				Stand By				
6				Stand By				
7				Stand By				
8				Stand By				
9				Stand By				
10				Stand By				
11				Stand By				
12	1	24	6:06	G-1A Online 3-12-10				JP
13	4	14	6:08	G-1A Online 3-13-10				JP
14	1	42	2:08	G-1A Online 3-14-10				WC
15	1	62	4:42	G-1A Online 3-15-10				WC
16	1	58	1:00	G-1A Online 3-16-10				WC
17	1	45	1:20	G1A Online 3-17-10				DG
18	1	60	1:00	G1A Online 3-18-10				DG
19	1	6	7:00	G1A Online 3-19-10				JB
20	2	12	3:04	G-1A Online 2-20-10				DG
21	0	12	2:16	G-1A Online 2-21-10				DG
22				Stand By				
23				Stand By				
24				Stand By				
25				Stand By				
26				Stand By				
27				Stand By				
28				Stand By				
29	1	10	0:14	On line				JT
30	1	6	2:06	On line				JT
31	0	35	2:09	On line				DG

Condition PQ11493PC5

**PLATFORM GRACE
399 CATERPILLAR GENERATOR ENGINE (G-1A)
DAILY CAM/RULE 74.9 MONITORING**

G-1A

Month: October

Year: 2009

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15% O ₂)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O ₂)	Nox	Secondary Reading (ppmv @ 15% O ₂) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1				STAND BY				
2				STAND BY				
3				STAND BY				
4				STAND BY				
5				STAND BY				
6				STAND BY				
7				STAND BY				
8				STAND BY				
9				STAND BY				
10				STAND BY				
11				STAND BY				
12				STAND BY				
13				STAND BY				
14				Maintenance Goes down on under voltage & frequency				
15				Maintenance Goes down on under voltage & frequency				
16				Maintenance Goes down on under voltage & frequency				
17				Maintenance Goes down on under voltage & frequency				
18				Maintenance Goes down on under voltage & frequency				
19				Maintenance Goes down on under voltage & frequency				
20				Maintenance Goes down on under voltage & frequency				
21				Maintenance Goes down on under voltage & frequency				
22				Maintenance Goes down on under voltage & frequency				
23				Maintenance Goes down on under voltage & frequency				
24				Maintenance Goes down on under voltage & frequency				
25				Maintenance Goes down on under voltage & frequency				
26				Maintenance Goes down on under voltage & frequency				
27				Maintenance Goes down on under voltage & frequency				
28				Maintenance Goes down on under voltage & frequency				
29				Maintenance Goes down on under voltage & frequency				
30				Maintenance Goes down on under voltage & frequency				
31				Maintenance Goes down on under voltage & frequency				

Condition PQ11493PCS

**PLATFORM GRACE
399 CATERPILLAR GENERATOR ENGINE (G-1A)
DAILY CAM/RULE 74.9 MONITORING**

G-1A

Month: December

Year: 2009

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS	SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15%O ₂)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O ₂)	Nox	Secondary Reading (ppmv @ 15% O ₂) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1				MAINTENANCE				
2				MAINTENANCE				
3				MAINTENANCE				
4				MAINTENANCE				
5				MAINTENANCE				
6				MAINTENANCE				
7				MAINTENANCE				
8	1	111	20:24					JT
9	1	118	3:10					JT
10	1	83	2:40					JT
11	1	87	2:33					JT
12	1	97	1:35					JT
13	1	89	2:26					JT
14	1	91	2:26					JT
15	1	88	1:24	AFR CONTROLLER ADJUSTMENTS	3	13	7:30	JT/JP
16				MAINTENANCE				
17				MAINTENANCE				
18				MAINTENANCE				
19				MAINTENANCE				
20				MAINTENANCE				
21	1	42	14:47					JR
22	1	17	4:00					DG
23	4	2	1:29					WC
24	2	1	4:24					WC
25	1	1	6:15					WC
26	2	2	17:18					WC
27	1	2	5:30					WC
28	2	3	2:00					WC
29	2	1	4:48					WC
30				STANDBY				
31				STANDBY				

Condition PQ11493PC5

**PLATFORM GRACE
399 CATERPILLAR GENERATOR ENGINE (G-1A)
DAILY CAM/RULE 74.9 MONITORING**

G-1A

Month: Jan

Year: 2010

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS	SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15% O2)		Time	Corrective Actions Taken (In the event that Initial test result is greater than 5 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 15% O2) (If needed)	Time	Tester's Initials
	Nox	CO						
1				STANDBY				
2				STANDBY				
3				STANDBY				
4				STANDBY				
5	3	1	2:04	ON LINE				JP
6	1	5	2:58					JT
7	2	1	2:59					JT
8	1	7	1:11					JT
9	1	1	2:35					JT
10				STANDBY				
11				STANDBY				
12	3	1	8:50	Source testing				JP
13	2	1	8:26	Source testing				JP
14				STANDBY				
15				STANDBY				
16				STANDBY				
17				STANDBY				
18	2	5	7:34	Swapped from G-1B @ 5:45				JP
19	1	20	2:58					DG
20	1	23	2:18	G-1A				JT
21	3	2	5:27	G-1A				WC
22	1	2	5:30	G-1A				WC
23	1	4	5:37	G-1A				WC
24	2	10	6:43	G-1A, (Swapped to G-1B @ 15:30 today)				WC
25				STANDBY				
26				STANDBY				
27				STANDBY				
28				STANDBY				
29	1	22	21:46	STANDBY / on line @ 20:00				JP
30	2	11	1:54	ON LINE				JP
31	3	23	1:59	ON LINE				JP

Condition PQI1493PC5

PLATFORM GRACE
 773 WAUKESHA GENERATOR ENGINE (G-1A)
 DAILY CAM/RULE 74.9 MONITORING

G-1A

Month: FEBRUARY

Year: 2010

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS	SECONDARY NOX/CO TEST		
Initial Reading (ppmv @ 15%O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 6 ppmv @ 15% O2)	Nox	Secondary Reading (ppmv @ 16% O2) (if needed)	Time	Tester's Initials
Day	CO						
1	2	32	1:52	On line			JP
2	1	11	1:02	On line			JP
3	4	9	1:38	On line			JT
4	2	24	2:28	On line			JT
5	2	6	1:13	On line			JT
6	2	6	1:51	On line			JT
7	2	25	1:51	On line for 19 hours			JT
8	2	1	3:02	On line			JT
9	1	2	1:27	On line			JT
10				Standby			
11				Standby			
12				Standby			
13				Standby			
14				Standby			
15				Standby			
16				Standby			
17	1	2	21:25	swap from G-1B @ 20:00hrs			JP
18	1	7	1:25	On line			JP
19	2	1	1:58	On line			JP
20	2	4	1:35	On line			JP
21	1	10	1:36	On line			JP
22	1	2	1:52	On line			JP
23	0	5	1:57	On line			JP
24	1	8	1:51	On Line			JT
25	1	10	2:15	On Line			JT
26	1	2	1:47	On Line			JT
27	0	5	1:58	On Line			JT
28	3	4	1:08	On Line			JT
29							
30							
31							

ENGINE DATA FOR THE CATERPILLAR (G-1B)

Engine Manufacturer: Caterpillar

Model No.: G-399 SI-TA HCR

Serial No.: 5VA00572

Engine Location: Turbine room, southwest corner of platform, production deck

Summary of Maintenance and Testing Reports are Included for the Following:

- Service records are attached.

Source Test Report: Please refer to the last source test conducted on 01/13/2010. This report was previously submitted to the District. Enclosed are summary of results.

G-1B

REPAIRS

2/9/2010

5753hrs

JEFF PAYNE

Oil leak

Filled crankcase with oil (was approximately 50 gallons low).

Ran and found accessory drive gear oil supply line on rear of front structure leaking and oil cooler supply line leaking at coupling. Remove accessory drive gear oil line and replaced mounting gasket and both nylon seal rings (nylon seal rings were washed out and broken). Removed and replaced oil cooler coupling assembly and elbow o-ring. Ran and checked for leaks. Ok. Replaced broken alternator drive belts. Replaced alternator belt guard with guard off G-1C do to broken mounting tab. Replaced all 4 ECM mounting pads (isolators) 3 out of 4 were broken and replaced ECM ground strap.

PARTS USED

3N-1322 COUPLING ASSEMBLY (1) 3P-6051 O-RING (1) oil cooler line

4L-3375 GASKET (1) 5N-4687 GASKET (16mm I.D. nylon) (1)

5N-4688 (13mm I.D. nylon) (1) accessory drive gear oil line

5L-3979 BELT (2) alternator belts

AI610125 MOUNTS (4) ECM isolators

**PLATFORM GRACE
GENERATOR SERVICE**

DATE; 3/13/2010

UNIT; G-1B

HOURS; 6225

MECHANIC: Jeff Payne

1500 HOUR SERVICE

REPLACE SPARK PLUGS: YES X NO
COMMENTS: _____

CHANGE & CLEAN OIL FILTERS: YES X NO
COMMENTS: _____

CHANGE CRANK CASE OIL: YES X NO
COMMENTS: _____

REPLACE AIR FILTER: YES X NO
COMMENTS: _____

REMOVE, BLOW OUT AND TURN CATALYST ELEMENTS: YES X NO
COMMENTS: _____

3000 HOUR SERVICE

ACID CLEAN CATALYST ELEMENT: YES NO X
COMMENTS: _____

REPLACE O2 SENSOR YES X NO
COMMENTS: _____

ADDITIONAL MAINTENANCE

DATE:3/13/2010

HOURS: 6225

MECHANIC : Jeff Payne

COMMENTS: changed SPINNER base out with base from G-1C, valve in old base
won't allow oil flow.

Per APCD rules & regulation, 74.9, Stationary Internal Combustion Engine.

Condition PQ11493PC5

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1B)
 DAILY CAM/RULE 74.9 MONITORING

G-1B

Month: APRIL

Year: 2008

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS			SECONDARY NOX/CO TEST		
Initial Reading (ppmv @ 16% O2)			Time	Corrective Actions Taken (in the event that initial test result is greater than 8 ppmv @ 16% O2)	Nox	Secondary Reading (ppmv @ 16% O2) (if needed)		Tester's Initials
Day	Nox	CO				Nox	CO	
1				G-1A				
2				Stand by				
3				Stand by				
4				Stand by				
6				Stand by				
8	2	1	20:52	G-1B AT 20:52				JT
7	0	15	2:44	G-1B				JT
8	0	3	5:25	G-1B				SM
9	0	2	5:45					SM
10	0	5	8:07					SM
11	0	2	5:14					SM
12	0	2	20:48					JP
13	0	8	5:11	G-1B				SM
14								
15								
16								
17								
18								
19								
20								
21				Stand by				
22				Stand by				
23				Stand by				
24				Stand by				
25				Stand by				
26				Stand by				
27				Stand by				
28				Stand by				
29				Stand by				
30				Stand by				

Condition FQ11493PCS

PLATFORM GRACE
 399 CATERPILLAR GENERATOR ENGINE (G-1B)
 DAILY CAM/RULE 74.9 MONITORING

G-1B

Month: MAY

Year: 2008

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST		
Initial Reading (ppmv @ 15% O ₂)		Time	Corrective Actions Taken (In the event that initial test results are greater than 8 ppmv @ 15% O ₂)		Secondary Reading (ppmv @ 15% O ₂) (If needed)	Time	Tester's Initials
Day	Nox	CO	Nox	CO	Nox	CO	
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
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19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							

Condition FQ11493PC5

PLATFORM GRACE
773 WAUKESHA GENERATOR ENGINE (G-1B)
DAILY CAM/RULE 74.9 MONITORING

G-1B

MONTH: JUNE

YEAR: 2009

INITIAL NOX/CO TEST				CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST		
Day	Initial Reading (ppmv @ 15% O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 6 ppmv @ 15% O2)		Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
	Nox	CO				Nox	CO	
1				Not in Service				
2				Not in Service				
3				Not in Service				
4				Not in Service				
5				Not in Service				
6				Not in Service				
7				Not in Service				
8				Not in Service				
9				Not in Service				
10				Not in Service				
11				Not in Service				
12				Not in Service				
13				Not in Service				
14				Not in Service				
15				Not in Service				
16				Not in Service				
17				Not in Service				
18				Not in Service				
19				Not in Service				
20	3	4	22:22					JP
21	0	6	2:02					JP
22	1	6	1:49					JP
23	1	3	1:23					JP
24	0	2	3:40					JT
25	0	0	3:01					JT
26				Not in Service				
27				Not in Service				
28				Not in Service				
29				Not in Service				
30				Not in Service				
31				Not in Service				

Condition PQ11493PCS

**PLATFORM GRACE
773 WAUKESHA GENERATOR ENGINE (G-1B)
DAILY CAM/RULE 74.9 MONITORING**

G-1B

Month: JULY

Year: 2009

INITIAL NOX/CO-TEST			CORRECTIVE ACTIONS			SECONDARY NOX/CO-TEST		
Day	Initial Reading (ppmv @ 15% O ₂)		Time	Corrective Actions Taken <small>(In the event that initial test result is greater than 5 ppmv @ 15% O₂)</small>	Nox	Secondary Reading (ppmv @ 15% O ₂) (if needed)		Tester's Initials
	Nox	CO				CO	Time	
1				Not In Service				
2				Not In Service				
3				Not In Service				
4				Not In Service				
5				Not In Service				
6				Not In Service				
7				Not In Service				
8				Not In Service				
9				Not In Service				
10				Not In Service				
11				Not In Service				
12				Not In Service				
13				Not In Service				
14				Not In Service				
15				Not In Service				
16				Not In Service				
17				Not In Service				
18				Not In Service				
19				Not In Service				
20				Not In Service				
21				Not In Service				
22				Not In Service				
23				Not In Service				
24				Not In Service				
25				Not In Service				
26				Not In Service				
27				Not In Service				
28				Not In Service				
29				Not In Service				
30				Not In Service				
31				Not In Service				

Condition PQ11493PC5

PLATFORM GRACE
 773 WAUKESHA GENERATOR ENGINE (G-1B)
 DAILY CAM/RULE 74.9 MONITORING

G-1B INITIAL NOX/CO TEST				Month: AUGUST	Year: 2009	G1-B			
Initial Reading (ppmv @ 15% O2)				CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
				Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 15% O2)					
Day	Nox	CO	Time			Nox	CO	Time	Tester's Initials
1				Not in Service					
2				Not in Service					
3	0	38	17:00						
4	0	18	5:09						
5				Not in Service					
6				Not in Service					
7				Not in Service					
8				Not in Service					
9				Not in Service					
10				Not in Service					
11				Not in Service					
12				Not in Service					
13				Not in Service					
14				Not in Service					
15				Not in Service					
16				Not in Service					
17				Not in Service					
18				Not in Service					
19				Not in Service					
20				Not in Service					
21				Not in Service					
22				Not in Service					
23				Not in Service					
24				Not in Service					
25				Not in Service					
26				Not in Service					
27				Not in Service					
28				Not in Service					
29				Not in Service					
29				Not in Service					
30				Not in Service					
31				Not in Service					

Condition PQ11493PCS

PLATFORM GRACE
773 WAUKESHA GENERATOR ENGINE (G-1B)
DAILY CAM/RULE 74.9 MONITORING

G-1B Month: SEPTEMBER Year: 2009

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST		
Initial Reading (ppmv @ 15% O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 16% O2)		Secondary Reading (ppmv @ 16% O2) (if needed)	Time	Tester's Initials
Day	Nox	CO	Nox	CO			
1							
2							
3	0	38					WC
4	0	18					WC
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
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27							
28							
29							
30							
31							

Condition PQ11493PC5

**PLATFORM GRACE
773 WAUKESHA GENERATOR ENGINE (G-1B)
DAILY CAM/RULE 74.9 MONITORING**

G-1B

Month: OCTOBER

Year: 2009

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST		
Initial Reading (ppmv @ 15% O2)		Time	Corrective Actions Taken (In the event that initial test result is greater than 5 ppmv @ 18% O2)		Secondary Reading (ppmv @ 15% O2) (if needed)		Tester's Initials
Day	Nox	CO			Nox	CO	
1				STAND BY			
2				STAND BY			
3				STAND BY			
4				STAND BY			
5				STAND BY			
6				STAND BY			
7				STAND BY			
8				STAND BY			
9				STAND BY			
10				STAND BY			
11				STAND BY			
12				STAND BY			
13				STAND BY			
14				STAND BY			
15				STAND BY			
16				STAND BY			
17				STAND BY			
18				STAND BY			
19				STAND BY			
20				STAND BY			
21				STAND BY			
22				STAND BY			
23				STAND BY			
24				STAND BY			
25				STAND BY			
26				STAND BY			
27				STAND BY			
28				STAND BY			
29				STAND BY			
30				STAND BY			
31				STAND BY			

Condition PQ11493PC5

**PLATFORM GRACE
773 WAUKESHA GENERATOR ENGINE (G-1B)
DAILY CAM/RULE 74.9 MONITORING**

G-1B

Month: November

Year: 2009

INITIAL NOX/CO TEST			CORRECTIVE ACTIONS		SECONDARY NOX/CO TEST			
Day	Initial Reading (ppmv @ 15% O ₂)		Time	Corrective Actions Taken (In the event that Initial test result is greater than 5 ppmv @ 15% O ₂)	Nox	Secondary Reading (ppmv @ 15% O ₂) (If needed)		Tester's Initials
	Nox	CO				CO	Time	
1				STAND BY				
2				STAND BY				
3				STAND BY				
4				STAND BY				
5				STAND BY				
6				STAND BY				
7				STAND BY				
8				STAND BY				
9				STAND BY				
10				STAND BY				
11				STAND BY				
12				STAND BY				
13				STAND BY				
14				STAND BY				
15				STAND BY				
16				STAND BY				
17				STAND BY				
18				STAND BY				
19				STAND BY				
20				STAND BY				
21				STAND BY				
22				STAND BY				
23				STAND BY				
24				STAND BY				
25				STAND BY				
26				STAND BY				
27				STAND BY				
28				STAND BY				
29				STAND BY				
30				STAND BY				