Chevron

Dale Haines
Operations Manager

Chevron North America
Exploration and Production
3800 Centerpoint Drive
Suite 100
Anchorage, Alaska 99503
Tel 907 263 7951
Fax 907 263 7698
Email daleah@chevron.com

August 18, 2010

Mr. Chae Park
U.S. Environmental Protection Agency
Region 10, Water Compliance Section
1200 Sixth Avenue, OW-133
Seattle, WA 98101

RECEIVED
AUG 19 2010
DEC
Division of Water Quality
Wastewater Discharge Program

RETURN RECEIPT REQUESTED
CERTIFIED MAIL 91 7108 2133 3937 7382 8081

Re: NPDES Permit No. AKG-31-5002
Trading Bay Production Facility July 2010 Discharge Monitoring Reports (DMR)

Dear Mr. Park:

Union Oil Company of California operates the Trading Bay Production Facility that discharges regulated effluents in Cook Inlet, Alaska under NPDES Permit No. AKG-31-5002. Pursuant to condition VI.B of the Permit, Union Oil Company of California is hereby submitting the July 2010 NPDES Discharge Monitoring Reports (DMRs) for the Trading Bay Production Facility.

The format of the attached July DMRs is essentially the same as the format of the DMRs we submitted in June, except for the items that your Data Steward has agreed to exclude on his July 16 email. The pages eliminated were all discharge forms for Granite Point Tank Farm and Trading Bay Production Facility that are not required by the permit and all the non-aqueous based drilling fluids (NAF) forms for all 12 facilities. We are using the forms provided by EPA for all other discharge reporting. These forms still contain a number of errors that have not been resolved. Consequently, we have revised the forms to accommodate the reporting that is required by the permit. Your Data Steward in the compliance and enforcement department is aware of the errors, and our revisions to accommodate the errors. We are awaiting further guidance from them on EPA's preferred path forward and the preferred forms for future DMRs to be submitted by Union.

Using the new forms, the DMRs for our 12 facilities still contain nearly 250 pages. Signing each page to certify the DMRs is a substantial administrative burden. Ms. Hahn Shaw telephonically approved Union submitting this letter as certification of all the attached DMRs, in place of endorsing each of the attached DMRs. Thus, the certification below applies to all of the DMRs attached to this letter.

If you have any questions, please direct them to Ms. Marilu Moreno-Jones at 907-263-7305 or via e-mail at mmjones@chevron.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Best regards,

Dale Haines

Dale Haines

cc: ADEC / Certified Mail 91 7108 2133 3937 7382 8098

NATIONAL PALLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No 2040-0004

PERMITTEE NAME/ADDRESS *(Include Facility Name/Location if Different)*

NAME: UNION OIL COMPANY OF CALIFORNIA (UNOCAL)
ADDRESS: P.O. BOX 196247
ANCHORAGE, AK 99519-6247
FACILITY: TRADING BAY TREATMENT FACILITY
LOCATION: COOK INLET, Alaska
ATTN: JOHN ZAGER, GENERAL MANAGER

AKG315002	015-A
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD			
	MM/DD/YYYY		MM/DD/YYYY
FROM	07/01/2010	TO	07/31/2010

DMR Mailing ZIP CODE: 99519
MINOR
(SUBR 02)
PRODUCED WATER AND SAND
External Outfall

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Nitrogen, ammonia total (as N)	SAMPLE MEASUREMENT	******	******	******	******	7	7	mg/L	0	Quarterly	GRAB
00610 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	Req. Mon. MO AVG	Req. Mon. DAILY MX	mg/L		Quarterly	GRAB
Silver total recoverable	SAMPLE MEASUREMENT	******	******	******	******	5	5	ug/L	0	Monthly	GRAB
01079 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	23 MO AVG	47 DAILY MX	ug/L		Monthly	GRAB
Silver total recoverable	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
01079 P 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	23 MO AVG	47 DAILY MX	ug/L		Quarterly	CALCTD
Silver total recoverable	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
01079 Q 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	23 MO AVG	47 DAILY MX	ug/L		Weekly	GRAB
Zinc, total recoverable	SAMPLE MEASUREMENT	******	******	******	******	0.03	0.03	mg/L	0	Monthly	GRAB
01094 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	0.9 MO AVG	1.9 DAILY MX	mg/L		Monthly	GRAB
Zinc, total recoverable	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
01094 P 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	0.9 MO AVG	1.9 DAILY MX	mg/L		Monthly	GRAB
Zinc, total recoverable	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
01094 Q 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	0.9 MO AVG	1.9 DAILY MX	mg/L		Quarterly	GRAB

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE		DATE
John Zager, General Manager Mid Continent/Alaska Business Unit	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	(907) 276-7600		08/18/2010
TYPED OR PRINTED			AREA Code	NUMBER	MM/DD/YYYY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

P=MONT. REDUCE (II.G.6.a.1.)
Q=MONT INCREASE (II.G.6.a.2.)
R=ACCELERATED TESTING (III.A.7)

NATIONAL PALLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No 2040-0004

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		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Copper, total recoverable	SAMPLE MEASUREMENT	******	******	******	******	6	6	ug/L	0	Monthly	GRAB
01119 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	47 MO AVG	117 DAILY MX	ug/L		Monthly	GRAB
Copper, total recoverable	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
01119 P 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	47 MO AVG	117 DAILY MX	ug/L		Quarterly	GRAB
Copper, total recoverable	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
01119 Q 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	47 MO AVG	117 DAILY MX	ug/L		Weekly	GRAB
Manganese, total recoverable	SAMPLE MEASUREMENT	******	******	******	******	2	2	mg/L	0	Monthly	GRAB
11123 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	25 MO AVG	50 DAILY MX	mg/L		Monthly	GRAB
Manganese, total recoverable	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
11123 P 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	25 MO AVG	50 DAILY MX	mg/L		Quarterly	GRAB
Manganese, total recoverable	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
11123 Q 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	25 MO AVG	50 DAILY MX	mg/L		Weekly	GRAB
Hydrocarbons, aromatic	SAMPLE MEASUREMENT	******	******	******	******	9	9	mg/L	0	Monthly	GRAB
39942 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	18 MO AVG	27 DAILY MX	mg/L		Monthly	GRAB

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Hydrocarbons, aromatic	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
39942 P 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	18 MO AVG	27 DAILY MX	mg/L		Quarterly	GRAB
Hydrocarbons, aromatic	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
39942 Q 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	18 MO AVG	27 DAILY MX	mg/L		Weekly	GRAB
Hydrocarbons, aqueous	SAMPLE MEASUREMENT	******	******	******	******	10	10	mg/L	0	Monthly	GRAB
50259 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	Req. Mon. MO AVG	Req. Mon. DAILY MX	mg/L		Monthly	GRAB
Hydrocarbons, aqueous	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
50259 P 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	Req. Mon. MO AVG	Req. Mon. DAILY MX	mg/L		Quarterly	GRAB
Hydrocarbons, aqueous	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
50259 Q 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	Req. Mon. MO AVG	Req. Mon. DAILY MX	mg/L		Weekly	GRAB
Mercury, total (as Hq)	SAMPLE MEASUREMENT	******	******	******	******	0.2	0.2	mg/L	0	Monthly	GRAB
71900 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	0.6 MO AVG	1.0 DAILY MX	ug/L		Monthly	GRAB
Mercury, total (as Hg)	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
71900 P 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	0.6 MO AVG	1.0 DAILY MX	ug/L		Quarterly	GRAB

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		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Mercury, total (as Hg)	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
71900 Q 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	0.6 MO AVG	1.0 DAILY MX	ug/L		Weekly	GRAB
Toxicity, Chronic	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
TT000 1 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	283 MO AVG	568 DAILY MX	toxic		Weekly	GRAB
Toxicity, Chronic	SAMPLE MEASUREMENT	******	******	******	******	No Sample	No Sample	toxic	NA	Quarterly	GRAB
TT000 P 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	283 MO AVG	568 DAILY MX	toxic		Quarterly	GRAB
Toxicity, Chronic	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
TT000 R 0 Effluent Gross	PERMIT REQUIREMENT	******	******	******	******	283 MO AVG	568 DAILY MX	toxic		See Permit	GRAB

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