Chevron

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Division of Water
Anchorage
MAY - 3 2011
RECEIVED
SCANNED
SEP 5/5 2339.48.006

April 28, 2011

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

RETURN RECEIPT REQUESTED
CERTIFIED MAIL: 91 7199 9991 7030 0644 1012

Re: REVISED Discharge Monitoring Reports
NPDES Permit No. AKG-31-5000

Dear Mr. Park:

Union Oil Company of California ("UOCC") operates the Anna Platform (AKG-31-5004), Bruce Platform (AKG-31-5006), Baker Platform (AKG-31-5005), Dillon Platform (AKG-31-5007), Dolly Varden Platform (AKG-31-5009), Granite Point Platform (AKG-31-5015), Granite Point Tank Farm (AKG-31-5001), Grayling Platform (AKG-31-5016), King Salmon (AKG-31-5008), Monopod Platform (AKG-31-5017), Steelhead Platform (AKG-31-5019) and Trading Bay Production Facility (AKG-31-5002). As part of our efforts to comply with the Cook Inlet NPDES General Permit AKG-31-5000 and applicable laws and regulations, UOCC performed an internal audit of all the Discharge Monitoring Reports (DMRs) and WET Full Reports submitted for the year 2010 and identified those that require revision. None of the changes result in any violations of permit conditions.

A list of revised DMRs is presented below in Table 1. Also listed is a WET Full Report Revision presented below in Table 2. Photocopies of the unaltered DMRs and Full WET Report, and the corrected DMRs in the new format and Full WET Report are attached. Consistent with the

authorization in your e-mail of September 16, 2010, this letter certifies all of the 86 pages of revised DMRs and the one page of revised WET report attached to this letter.

If you have any questions regarding these reports, please contact 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.

Sincerely,

Dale Haines

Dale A. Haines

cc: ADEC / Certified Mail 91 7199 9991 7030 0644 1029

Table 1. DMR Revisions

January 2010

Facility	Parameter	Reason for Revision
Bruce Platform	Non-Contact Cooling Water flow rates 50050 1 1	Database did not transfer flow rate to the DMR form. The actual value is 0.000450 for monthly average, and 0.000600 for the daily max.
Grayling Platform	Average Deck Drainage Sent to Onshore Facility	Database calculation error. The actual value is 0.000777.
Grayling Platform	Waterflooding Discharge average flow rate 50050 1 1	Database calculation error. The actual value is 1.267244.
Monopod Platform	Waterflooding Discharge average flow rate 50050 1 1	Database calculation error. The actual value is 1.516513.

March 2010

Facility	Parameter	Reason for Revision
Bruce Platform	Non-Contact Cooling Water flow rates 50050 1 1	Operator did not enter data before the reporting date. The actual value is 0.000433 for monthly average, and 0.001200 for the daily max.
Trading Bay Production Facility	Produced Water average flow rate 50050 1 0	Database calculation error. The actual value is 3.759629.
Trading Bay Production Facility	Estimated Workover Fluid flow rate	Database calculation error. The actual value is 0.017855.
Trading Bay Production Facility	Zinc, Total Recoverable 01094 1 0	Formatting error in the database. NPDES format limits the value to the tenths place. We changed the format to the hundredths place in order to avoid a recording of 0. The actual value is 0.03.

April 2010

Facility	Parameter	Reason for Revision
Bruce Platform	Non-Contact Cooling Water flow rates 50050 1 1	Electronic error occurred during the printing of the DMR form. The actual value is 0.000388 for monthly average, and 0.000600 for the daily max.

May 2010

Facility	Parameter	Reason for Revision
Bruce Platform	Non-Contact Cooling Water flow rates 50050 1 1	Database did not transfer flow rate to the DMR form. The actual value is 0.000300 for the monthly average, and 0.000300 for the daily max.
Bruce Platform	Fire Control System Test Water average flow rate 50050 1 1	Database did not transfer flow rate to the DMR form. The actual value is 0.006000.
Dolly Varden Platform	Fire Control System Test Water average flow rate 50050 1 1	Database did not transfer flow rate to the DMR form. The actual value is 0.008985.
Granite Point Platform	BOD, 5-day, 20 deg. C 00310 O 1	BOD results were reported as M10 Biological Unit and should have been reported as M10 MSD.
Granite Point Tank Farm	Mercury, Total (as Hg) 71900 1 0	Typo error. Mercury result was reported in mg/L and should have been reported in µg/L. The actual value is 0.1 µg/L.
Trading Bay Production Facility	Mercury, Total (as Hg) 71900 1 0	Typo error. Mercury result was reported in mg/L and should have been reported in µg/L. The actual value is 0.2 µg/L.

June 2010

Facility	Parameter	Reason for Revision
Anna Platform	Fire Control System Test Water average flow rate 50050 1 1	Database did not transfer flow rate to the DMR form. The actual value is 0.020000.
Anna Platform	Non-Contact Cooling Water average flow rate 50050 1 1	Database did not transfer flow rate to the DMR form. The actual value is 0.000250.
Bruce Platform	Fire Control System Test Water average flow rate 50050 1 1	Database did not transfer flow rate to the DMR form. The actual value is 0.006000.
Bruce Platform	Non-Contact Cooling Water flow rates 50050 1 1	Database did not transfer flow rate to the DMR form. The actual value is 0.000300 for the monthly average, and 0.000300 for the daily max.
Granite Point Tank Farm	Mercury, Total (as Hq) 71900 1 0	Mercury result was reported in mg/L and should have been reported in µg/L. The actual value is 0.2 µg/L.
Trading Bay Production Facility	Mercury, Total (as Hq) 71900 1 0	Mercury result was reported in mg/L and should have been reported in µg/L. The actual value is 0.2 µg/L.

July 2010

Facility	Parameter	Reason for Revision
Granite Point Platform	BOD, 5-day, 20 deg. C 00310 O 1	BOD results were reported as M10 Biological Unit and should have been reported as M10 MSD.

December 2010

Facility	Parameter	Reason for Revision
Trading Bay Production Facility	Estimated Completion Fluid Flow Rate	Database calculation error. The actual value is 0.033222.

May-December 2010

Facility	Parameter	Reason for Revision
Anna, Baker, Bruce, Dillon, and Grayling Platforms	Produced Water and Sand form 0-15A	New DMR requirements include additional forms with no discharges. This PW form was not included on the original request from EPA but was added later after collaboration with the EPA data steward. We are providing these forms to be consistent with the current DMR reporting requirements.

Table 2. 2010 WET Full Report Revision

Facility	Quarter	Parameter	Reason for Revision
King Salmon Platform	3 Qtr. 2010	Waterflood Flow Rate at time of sample collection	The flow rate reported was for the 31st of July and not the 30th. The actual value is 0.367088.

NATIONAL PALLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

REVISED 04/28/2011

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	12/01/2010	TO	12/31/2010

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			
pH	SAMPLE MEASUREMENT	******	******	******	NA	******	NA	NA	NA	NA	NA
00400 V 0 See Comments	PERMIT REQUIREMENT	******	******	******	6 MINIMUM	******	9 MAXIMUM	SU		Monthly	GRAB
pH	SAMPLE MEASUREMENT	******	******	******	7.2	******	7.5	SU	0	Weekly	GRAB
00400 W 0 See Comments	PERMIT REQUIREMENT	******	******	******	6 MINIMUM	******	9 MAXIMUM	SU		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
03582 T 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	29 MO AVG	42 DAILY MX	ug/L		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	******	******	******	******	25	34	ug/L	0	Weekly	COMP24
03582 U 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	29 MO AVG	42 DAILY MX	ug/L		Weekly	COMP24
Flow, in conduit or thru treatment plant*	SAMPLE MEASUREMENT	3.124457	3.571680	Mgal/d	******	******	******	******	NA	Monthly	ESTIMA
50050 1 0 Effluent Gross	PERMIT REQUIREMENT	Req. Mon. MO AVG	Req. Mon. DAILY MX	Mgal/d	******	******	******	******		Monthly	ESTIMA
Produced water, free oil	SAMPLE MEASUREMENT	******	NA	NA	******	******	******	******	NA	NA	NA
79834 1 0 Effluent Gross	PERMIT REQUIREMENT	******	Req. Mon. MO TOTAL	occur/mo	******	******	******	******		Daily	VISUAL

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 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.		(907) 276-7600		04/28/2011
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA Code	NUMBER	MM/DD/YYYY

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

NO DISCHARGE OF PRODUCED SAND IS ALLOWED
T = GRAB SAMPLE
U = COMPOSIT SAMPLE
V = DISCHARGE < 1 MGD (PREVIOUS MONTHS AVG RATE)
W = DISCHARGE > 1 MGD (PREVIOUS MONTH'S AVG RATE)

* Flow rates include deck drainage from Dolly Varden, Grayling, King Salmon, Monopod, and Steelhead Platforms.
Estimated completion fluid flow rate: 0.033222 MGD

Revision 04/28/2011: Estimated completion fluid flow rate was miscalculated.

NATIONAL PALLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

COPY

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	12/01/2010	TO 12/31/2010

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			
pH	SAMPLE MEASUREMENT	******	******	******	NA	******	NA	NA	NA	NA	NA
00400 V 0 See Comments	PERMIT REQUIREMENT	******	******	******	6 MINIMUM	******	9 MAXIMUM	SU		Monthly	GRAB
pH	SAMPLE MEASUREMENT	******	******	******	7.2	******	7.5	SU	0	Weekly	GRAB
00400 W 0 See Comments	PERMIT REQUIREMENT	******	******	******	6 MINIMUM	******	9 MAXIMUM	SU		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	******	******	******	******	NA	NA	NA	NA	NA	NA
03582 T 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	29 MO AVG	42 DAILY MX	ug/L		Weekly	GRAB
Oil and grease	SAMPLE MEASUREMENT	******	******	******	******	25	34	ug/L	0	Weekly	COMP24
03582 U 0 See Comments	PERMIT REQUIREMENT	******	******	******	******	29 MO AVG	42 DAILY MX	ug/L		Weekly	COMP24
Flow, in conduit or thru treatment plant*	SAMPLE MEASUREMENT	3.124457	3.571680	Mgal/d	******	******	******	******	NA	Monthly	ESTIMA
50050 1 0 Effluent Gross	PERMIT REQUIREMENT	Req. Mon. MO AVG	Req. Mon. DAILY MX	Mgal/d	******	******	******	******		Monthly	ESTIMA
Produced water, free oil	SAMPLE MEASUREMENT	******	NA	NA	******	******	******	******	NA	NA	NA
79834 1 0 Effluent Gross	PERMIT REQUIREMENT	******	Req. Mon. MO TOTAL	occur/mo	******	******	******	******		Daily	VISUAL

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 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.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	(907) 276-7600		01/14/2011
TYPED OR PRINTED			AREA Code	NUMBER	MM/DD/YYYY

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

NO DISCHARGE OF PRODUCED SAND IS ALLOWED
T = GRAB SAMPLE
U = COMPOSIT SAMPLE
V = DISCHARGE < 1 MGD (PREVIOUS MONTHS AVG RATE)
W = DISCHARGE > 1 MGD (PREVIOUS MONTH'S AVG RATE)

* Flow rates include deck drainage from Dolly Varden, Grayling, King Salmon, Monopod, and Steelhead Platforms.
Estimated completion fluid flow rate: **0.022148 MGD**