Chevron

**Dale Haines**
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Division of Water
Anchorage
MAY - 3 2011
RECEIVED
SCANNED
SD 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)**

Form Approved
OMB No. 2040-0004

REVISED
04/28/2011

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 | 06/01/2010 | TO 06/30/2010 |

**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 | | | |
| 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 Hg) | SAMPLE MEASUREMENT | ****** | ****** | ****** | ****** | 0.2 | 0.2 | ug/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 |

| NAME/TITLE PRINCIPAL EXECUTIVE OFFICER | | | TELEPHONE | | DATE |
|---|---|---|---|---|---|
| John Zager, General Manager<br>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 | | 04/28/2011 |
| TYPED OR PRINTED | | | AREA Code | NUMBER | MM/DD/YYYY |

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

04/28/2011 Revision: Mercury result was reported in mg/L and should have been reported in ug/L.

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)**

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 | 06/01/2010 | TO 06/30/2010 |

**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 | | | |
| 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 Hg) | 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 |

| NAME/TITLE PRINCIPAL EXECUTIVE OFFICER | | | TELEPHONE | | DATE |
|---|---|---|---|---|---|
| John Zager, General Manager<br>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 | | 07/20/2010 |
| TYPED OR PRINTED | | | AREA Code | NUMBER | MM/DD/YYYY |

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

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