DCOR, LLC
290 Maple Court, Suite 290
Ventura, Ca 93003

February 27, 2015

EPA, Region 9
NPDES Permit Office (WTR–5)
75 Hawthorne Street
San Francisco
CA94105-3901

Sub: On-Line Oil and Grease Monitoring

Dear Mr. Eugene Bromley,

Please find attached the action that DCOR has taken, as required by the terms of National Pollutant Discharge Elimination System (NPDES) General Permit No. CAG280000 to monitor:

- Oil and Grease every one hour for platforms with an average daily Produced Water discharge greater than 100,000gallons/day in the year prior to the permit effective day
- Oil and Grease every four hour for platforms with an average daily Produced Water discharge less than or equal to100,000gallons/day in the year prior to the permit effective day

If you have any question, please let me know.

Sincerely,

Jay Rao
DCOR, LLC

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DCOR has the following Platforms that discharge produced water into the Pacific Ocean

1. Platform A
2. Platform B
3. Platform Hillhouse
4. Platform Gina
5. Platform Gilda
6. Platform Edith

Year prior to the permit effective date, the following volume of produced water was discharged per day:

1. At Platform A: 266,432 Gallons
2. At Platform B: 204,382 Gallons
3. Platform Hillhouse: 327,352 Gallons
4. Platform Gina: 55,818 Gallons
5. Gilda: 226,856 Gallons
6. Edith: 19,649 Gallons

Actions taken:

1. Platform A: The existing On-Line HACH Turbidity Meter Surface Scatter 7 has been calibrated and a co-relation between Oil and Grease and Turbidity (NTU) has been established. The Alarm set point is at 25 NTU. As per the manufacture's instruction, the unit would be maintained and calibrated once every 3 months with the standard FORMAZIN. Whenever the alarm goes off, the operator would immediately take the corrective measure/s and document it in their log book. All the maintenance and calibration records would be saved in DCOR's main server-s-drive.

2. Platform B: The existing On-Line HACH Turbidity Meter Surface Scatter 6 has been calibrated and a co-relation between Oil and Grease and Turbidity (NTU) has been established. The Alarm set point is at 20 NTU. As per the manufacture's instruction, the unit would be maintained, and would be calibrated once every 3 months with the standard FORMAZIN. Whenever the alarm goes off, the operator would immediately take the

corrective measure/s and document it in their log book. All the calibration and maintenance records would be saved in DCOR's server- s-drive.

3. Platform Hillhouse: The existing On-Line HACH Turbidity Meter Surface Scatter 6 has been calibrated and a co-relation between Oil and Grease and Turbidity (NTU) has been established. The Alarm set point is at 22 NTU.As per the manufacture's instruction, the unit would be maintained, and would be calibrated once every 3 months with the standard FORMAZIN. Whenever the alarm goes off, the operator would immediately take the corrective measure/s and document it in their log book. All the calibration and maintenance records would be saved in DCOR's main server- s-drive.
4. Platform Gina: It would monitor its produced water every 4 hours with potable HACH Turbidity Meter 2100P. Whenever it reads more than 25NTU, the operator would immediately take the corrective action and document it. As per the manufacturer's instruction, the unit would be maintained, and would be calibrated once every 3 months. All the NTU readings, maintenance and calibration record would be saved in DCOR's server- s-drive.
5. Platform Gilda: Its produced water would be monitored every hour at its on-shore processing facility-Mandalay on-Shore Separation facility (MOSF)- with HACH Photo Spectrometer DR1900. Perchlor Ethylene is used as solvent to extract oil and grease from the produced water. DR1900 reads the oil and grease in the extracted sample in PPM. This unit is calibrated with the standard solution prepared by the certified lab. Whenever it reads more than 20 PPM, the operator would immediately take corrective action/s to address the problem. All the hourly readings, calibration and maintenance record would be maintained in DCOR's share-drive.
6. Platform Edith: It would monitor its produced water every 4 hours with potable HACH Turbidity Meter 2100Q. Whenever it reads more than 25NTU, the operator would immediately take the corrective action and document it. As per the manufacturer's instruction, the unit would be maintained, and would be calibrated once every 3 months. All the NTU readings, maintenance and calibration record would be saved in DCOR's server- s-drive.

Note: Platform Habitat has not been discharging any produced water since September, 2013. Whenever it starts doing so, DCOR would provide them with HACH Turbidity Meter 2100Q.