

## **Appendix K**

# **ELLWOOD ONSHORE FACILITY PERMIT HISTORY AND SAFETY AUDITS**

FINAL

District REEVALUATION PERMIT to OPERATE No. 7904-R9  
and  
PART 70 *Renewal* OPERATING PERMIT No. 7904-R9

VENOCO - ELLWOOD  
ELLWOOD ONSHORE FACILITY

7979 HOLLISTER AVENUE  
GOLETA, CA 93117

OPERATOR

Venoco, Inc.

OWNERSHIP

Venoco, Inc.

Santa Barbara County  
Air Pollution Control District

December, 2011

## **1.2 Facility Overview**

1.2.1 General: Venoco, Inc. (Venoco) is the sole owner and operator of the EOF. The EOF is located approximately 14 miles west of downtown Santa Barbara and south of US Highway 101. For District regulatory purposes, the facility is located in the Southern Zone 2 of Santa Barbara County. Figure 1.1 shows the relative location of the facility within the county.

The EOF was constructed by the Atlantic Richfield Oil Company (ARCO) in the early 1970s, was sold to the Mobil Oil Corporation in the early 1990s, and was then sold to Venoco Inc. in 1997.

The Ellwood Onshore Facility consists of the following primary emission systems and processes:

- Crude oil receiving system
- Crude oil processing system
- Crude oil and other HC liquid storage and transfer system
- Gas receiving system
- Gas processing/delivery system, sulfur removal including dehydration, sweetening and *COI* removal
- Gas compression/low temperature system including LPG/NGL recovery
- Loading rack for LPG and NGL and other HC liquid trucks
- Vapor/flare gas collection and incineration system
- Produced and waste water system
- Pipeline and equipment components with fugitive emissions
- Support system including process heater

The *Venoco- Ellwood* stationary source (SSID = 1063) consists of the following four facilities:

- Platform Holly (FIO= 3105)
- Ellwood Onshore Facility (FID= 0028)
- Beachfront Lease (FID= 3035)
- Seep Containment Device (FID= 1065)

1.2.2 Facility Operations Overview: The EOF is designed to receive oil, water and gas from Platform Holly and the Seep Containment Devices located on State Coastal Lease 3242. Crude oil emulsion and sour gas containing hydrogen sulfide (H<sub>2</sub>S) from Platform Holly and gas from the Seep Containment Devices are separately transported via sub-sea pipelines to the EOF. At the EOF, gas and water are separated from the crude oil and the sour gas is processed to sales gas quality.

Oil: Crude oil emulsion is heated in heat exchanger banks and heater treaters. The heating plus chemical and electrical treatment of the emulsion results in separation of entrained water. Dry crude from the heater treaters is stripped to reduce its hydrogen sulfide content and then piped to one of two stock tanks for storage. From the stock tanks, the crude is sent to a Lease Automated Custody Transfer (LACT) unit to be metered and sent to the Ellwood Marine Terminal, where it is shipped by ocean-going barge to refining facilities.

VENOCO has recently received an Authority to Construct a pipeline to a connection with the Plains Pipeline, L.P., pipeline near Corral Canyon. When this construction is completed, oil from the EOF will be shipped via this pipeline, rather than the Ellwood Marine Terminal. This will result in the shutdown of the marine terminal.

The water and residual oil separated from the crude emulsion in the heater treaters are piped to a wash tank to separate the water and the oil. In the tank, oil is skimmed from the top and recycled back into the oil processing system. Bottom water is pumped off and injected into an on-site disposal well.

*Gas:* Sour field gas from Platform Holly is combined with gas from the Seep devices. The combined stream is then chilled to separate entrained liquids, and scrubbed to reduce its hydrogen sulfide content to Public Utility Commission (PUC) natural gas standards. The resultant gas stream is compressed to about 1,000 psig and sent through a membrane separator to reduce the carbon dioxide content. The PUC quality natural gas is then metered into the sales gas pipeline via a sales gas handling system.

When the plant is not processing gas from Holly, the seep gas is rerouted to iron sponge vessels, which contain either iron sponge material or Sulfa-Treat to remove sulfur compounds. The sweetened seep gas is then incinerated.

The EOF also produces liquefied petroleum gas (LPG), natural gas liquids (NGLs) and elemental sulfur. The LPG and NGL are trucked out of the EOF via onsite loading racks. Elemental sulfur is removed from the site by trucks.

The EOF was permitted in 1982 (PTO 4970) to operate a Stretford unit to lower the high hydrogen sulfide levels in the field gas and to operate an odor abatement system (OAS). Installations at the EOF included a thermal oxidizer unit in 1982; also a Grace unit was installed in 1992 (ATC 8262) for COI removal that replaced the existing Fluor unit. In 1995, the heater treaters at the EOF were de-rated (ATC 9218) and the process heater modified (ATC9217); and, in 1997 (ATC 9473) the EOF was re-configured to remove the OAS and route organic sulfide gases to an existing thermal oxidizer (11-205) for incineration.

The design processing capacity of the EOF is 20,000 barrels/day (bpd) of crude oil-emulsion and 20 million standard cubic feet/day (MMSCFD) of incoming gas that includes up to 20% of COI. It is currently District-permitted to produce 13,000 bpd of dry oil, 13 MMSCFD of gas, 10 million gallons/yr of LPG and 5 million gallons/yr of NGL. Sulfur production is limited to 9.8 long tons/day (21,952 lbs/day). Current oil true vapor pressure (TVP) is 2.8 psia and API gravity is approximately 21.

1.2.3 Facility Permits Overview: The EOF operates under a combined Federal Part 70 Operating Permit No. 7904 and District Permit to Operate (PTO) 7904, both issued by the District.

1.2.3.1 *Prc-1979, Pre-District-NSR-Delegation Period* - ARCO Ellwood Onshore Facility submitted a number of permit (AIC and PTO) applications for equipment to the newly formed District during 1971 and 1972. These included ATCIPTO application #5 21122 (12128171), 171, 172, 173, 174, 175 and 176 (5/30172): all applications except # 171 were denied because of the listed high sulfur content in the in-plant fuel gas. As to ATCIPTO# 171, which listed a heater treater (10' dia. x 50' high), two 2,000-bbl crude oil storage tanks, a LACT unit and a sales and lift gas conditioning/compressing facility (these devices were in use at the EOF site), no action was taken on the application. Following this, ARCO obtained a long-term variance from the District Hearing Board to operate all

equipment listed in ATC/PTO's 1711172/174!175 until March 1977. ARCO submitted ATC/PTO applications 340/383 in mid-1973. The equipment items in #340 were subsequently de-activated; and, the other application was cancelled to facilitate a modified application for the same unit (Stretford unit). Application #982 to install an iron sponge unit (for removing H<sub>2</sub>S) and a GAC carbon canister (for removing ROCs) was submitted in 11176; PTO 2164 for the two equipment were issued in 11176. ARCO submitted applications J 194, 1195 and 1196 on July 11, 1977 addressing permits for increased production at the crude oil sweetening unit, the Stretford unit and the Fluor CO<sub>2</sub> removal unit respectively. An NSR Application 1196 was also submitted to the USEPA by AReO (Reference: Atlantic Richfield - NSR 01196] on 12/12/77 for increased sour crude processing (heater treater dehydration, sweetening and transport to marine terminal) from 4,000 to 20,000 barrels/day and increased gas stream processing (sweetening, compression, LPG recovery and CO<sub>2</sub> removal) from 4 to 20 MMSCFD. The District denied ATC 1195 application; but, issued ATC 1196 covering all the equipment and process rates listed above, on 1/23/78. Finally, ARCO submitted an ATCIPTO application 1198 for a flare gas incinerator (8' high x 20'dia.) in 8/77 and obtained District PTO #2166 for the device (H-205) in 8/77.

*1.2.3.2 Post 1979, Post District-NSR-Delegation Period* - ARCO submitted ATC/PTO applications 4342 and 4450 for a vacuum truck exhaust scrubber and a vapor recovery unit (VRU) cooler in 8/81. The District issued an ATC for the VRU cooler in 8/81 and a PTO 4342 for the scrubber in 8/82. Later, in 11181, the District and ARCO reached a settlement on the Stretford unit, and a revised PTO 5076 was issued in 1982 addressing modified operations of this unit. Application 4578 for an incinerator (14.5' diameter x 30' high) was submitted on 1/82 and an ATCIPTO was issued for it (H-206) in 1/82. Other pre-construction permits issued are, as follows:

ATC 7234 (9/1988) - implemented a fugitive hydrocarbon inspection & maintenance (I&M) program; ATC 8262 (12/1991) - installed the Grace CO<sub>2</sub> removal unit to replace the existing 'Fluor' unit; ATC 9217 (9/1994) - modified the existing process heater (H-204) to reduce its NO emissions to District Rule 342 compliance limits; ATC 9218 (2/1996) - de-rated the three heater treaters (1-1-201, H-202 & H-203) by burner modifications and limiting fuel type and hourly fuel use; ATC 9473 (11/1997)- modified the existing odor abatement system (OAS) by modifying the existing thermal oxidizer H-205 and associated OAS process flow lines and odor abatement equipment. ATC 9218-01 (5/1996) modified all burners and further de-rated R-202.

The EOF operator proposed in October 1988, the modification of the 'Stretford' solution operation to a 'LO-Cat' solution operation for the sulfur recovery unit. In March 1989, the Stretford unit was modified to a 'LO-Cat' unit. This modification was considered 'de minimis' under the District rules. However, the OAS modification in 1997 described earlier (ATC 9473). required piping additions and increased fugitive gas emissions. The District concludes that the 1988 modification triggered the federal NSPS, 40 CFR Part 60, Subpart LLL. (Onshore Natural Gas Processing: SO<sub>2</sub> Emissions) promulgated in 1985. The facility also obtained an ATCIPTO 1537 to operate a gasoline-fueling pump in 1991. *Note: All conditions in (a) the NSR-01196 and (6) all post-1979 ATCs are federally enforceable.*

1.2.3.3 *Post Sept 1998 Part 70 Permit Issuance-* Since the issuance of the initial Part70 Operating Permit on September 25, 1998, there have been the following permit actions:

*ATC Mod 9473-06:* Minor modification to the permit conditions for H-205 to relax residence time and increase combustion temperature to reflect applicable BACT ROC control standards. This permit was issued on 5/24/1999.

*A TC/PTO 10022:* For conversion of an exempt Therminol storage tank into a ROC containing emulsion breaker storage tank. This permit was issued on 12/31/1998.

*PTO Mod 7904-01:* District and Minor Part 70 modification to incorporate ATC 9473-6 and *ATC/PTO 10022* requirements. This permit was issued on 12/16/1999.

*A TC/P TO Mod 7904-02:* Combined ATC/PTO to document Abatement Order 99-6(A) required installation of GSF Odor Station and Met, DAS, and H,S Fence line monitors at the EOF. Also includes Handheld H,S meter for District. This permit was issued on 4/21/2000.

*ATC 10749.* For addition of fugitive emissions components (valves and connections) in conjunction with upgrading the York Compressor. ATC 10749 was incorporated into PT70-District PTO 7904-R 7.

*ATC/PTO 10941:* ATC 10941 was issued on 27 January 2003 addressing the Grace Unit modification required to meet newer PUC specifications for CO1 content in the sales gas. The PTO was issued on 24 August 2004.

*ATC/PTO 11106:* The combined ATC/PTO 11106 was issued on 7 September 2004 to address the frequency changes in pigging events between EOr and Platform Holly.

*ATC/PTO I J 169:* ATC III 69 was issued on 2 September 2004 to address an annual increase of heat input to H-205 unit along with establishing a revised planned flaring volume limit excluding CO2 from gas streams flared in H-20S, H-206 and H-207. PTO 11169 was issued on 25 February 2005.

Since PT 70-District PTO 7904-R7 was issued in December 2005 the following permits have been issued:

*ATC/PTO 11579:* ATC 11579 was issued on September 15,2005 the addition of four permeate tubes to the "firststage of the grace CO, removal unit lind the installation of a two tube second stage. PTO 11579 was issued on May 27, 2008.

*PTO Mot17904 02:* PTO Mod 7904 02 was issued June 26,2008 to increase the permitted CO fraction of the gas entering the EOF and decrease the permitted flaring volume to ensure compliance with Rule 359.

*ATC/PTO 12839:* ATC/PTO 12839 was issued August II, 2008 to decrease the permitted NO, emission factor for H-205. The permitted emissions were reduced concurrently with the issuance of ATC 12804 [or a new crane engine on Platform Holly in order to keep the stationary source NEI below the offset thresholds.

ATCIPTO 12886: ATC/PTO 12886, was issued December 28, 2008 to add fugitive components from various small projects to the permit. This ATC/PTO was applied for in response to NOV 8814 for exceeding the de minimis limit of 24.00 lb/day. The addition of the fugitive components contributes to the NEI of the station's source.

PTO Mod 7904-03: PTO Mod 7904-03 was issued October 22, 2009 to increase the CO<sub>2</sub> content of the inlet gas to the Ellwood Onshore Facility and decrease volumetric flaring.

ATC Mod 13420-01: ATC Mod 13420-01 was issued November 4, 2010 to replace the existing burner and blower on H-205 with new units. This permit increased the permitted hourly and daily flaring rates of H-205 and decreased the NO<sub>x</sub> and CO emission factors. The permit decreased the allowed hourly, daily, and annual flaring rates for H-206. The permit also corrected the burner capacity listed for H-207 and authorized an increase in the hourly, daily, and annual flaring rates for H-207. The permit generated a "P2" term for the modifications to H-205 and H-206 and an "I" term for the modifications to H-207.

ATC 13689: ATC 13689 authorizes the construction of a pipeline from EOF to a connection with the Plains Pipeline, L.P. pipeline near Corral Canyon. When this construction is completed, oil from the EOF will be shipped via this pipeline, rather than the Ellwood Marine Terminal. This will result in the shutdown of the marine terminal.

### 1.3 Emission Sources

The emissions from the Ellwood Onshore Facility come from combustion sources (process heater, heater treaters, and thermal oxidizers), oil storage tanks, a reject oil tank, LPGINGI- and emulsion breaker loading racks, vacuum truck exhaust, oil/gas separators and process sumps, pig receivers and a launcher, gas sweetening unit, Glycol dehydration unit, diesel fuel pump and fugitive emission components such as valves and flanges. Section 4 of the permit provides the District's engineering analysis of these emission sources. Section 5 of the permit describes the allowable emissions from each permitted emissions unit and also lists the potential emissions from non-permitted emission units.

Specifically, the emission sources include:

- One (1) diesel-fired IC engine used to drive an emergency firewater pump.
- One (1) diesel-fired IC engine emergency backup electrical generator to power the VRU compressors, and other essential equipment (e.g., general lighting, computers, alarms, and shutdown systems, etc.).
- Three (3) in-plant fuel gas-fired heater treaters;
- One (1) gas-fired process heater unit, using in-plant fuel gas plus permeate gas;
- Two (2) older thermal oxidizers, one (1) modified thermal oxidizer;
- Three (3) crude oil storage tanks (two stock tanks and one LACT tank), one (1) emulsion breaker liquid tank;
- One (1) oil pipeline pig receiver, one (1) gas pipeline pig receiver, one (1) gas pipeline launcher, one (1) utility gas pipeline pig receiver;



**2013 VENOCO EOF SIMQAP AUDIT MATRIX**

Audit Dates: 11-12 & 12-3, 2013			Revision Date: May 23, 2014					
Item #	Audit Findings	Dept.	Priority #	Recommendations	Due	Done	Status	Accepted by SSRRC
1	NDT inspections reports have number of outstanding items still not addressed. Last year's Audit Item #54	B&S	3	Address and close out the outstanding items in a timely manner.	12/12/13		A Major milestone is achieved. Venoco is now current with its NDT inspection program @ EOF.	5/21/14
2	Tool storage container does not open/close properly. (located near gate entrance.)	APCD	4	Repair or replace lid on tool storage container.	1/31/14	12/5/13	Tool Box replaced.	12/16/13
3	Surface coating failure and corrosion on two overhead sour gas lines (approximately 1/2-inch) going to a total flow meter (pre-LoCat).	APCD	3	Replace both sour gas lines with stainless steel lines.	1/31/14	3/15/14	The lines are replaced with Stainless steel tubing.	4/9/14
4	Corrosion on top-deck support brackets (LoCat area).	APCD	3	Assess integrity of support brackets. If deemed necessary, take appropriate measures to either repair or replace brackets. Actions to be taken also to include surface coating to prevent future corrosion.	1/31/14	4/27/14	Installed shims and cleaned up the supports.	5/1/14
5	Air cooler (bypassed off the Hoffman Blowers) is not labeled "Out Of Service".	APCD/B&S	4	Label the Air Cooler Out of Service.	1/31/14	11/13/13	The Air Cooler is labeled OOS.	12/16/13

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6	By the Firewater Tanks, jockey pump is missing a car seal on the discharge side.	APCD	4	Install car seal (or equivalent).	1/31/14	11/13/13	Car seals are installed.	12/16/13
7	Equipment and tool storage shelves inside the Operations Storage Container ("C-Train") are not earthquake strapped.	APCD	4	Earthquake strap the storage shelves.	1/31/14	12/13/13	All shelves in the "C Train" are now bolted to the wall.	1/22/14
8	Electrical outlet inside the Operations Storage Container ("C-Train"), near the door, does not have GFI protection.	APCD	3	Replace with GFI outlet.	1/31/14	3/15/14	GFI outlet is installed.	4/9/14
9	V-224 (Hybon Scrubber): Horizontal piping on level controller cracked (approximately 3/4 to 1-inch wide) and leaking sweet gas.	APCD	2	Isolate and block in the field.	ASAP	11/12/13	Isolated and blocked in the field.	11/12/13
10	V-224 (Hybon Scrubber): Horizontal piping on level controller cracked (approximately 3/4 to 1-inch wide) and leaking sweet gas.	APCD	3	Repair the cracked pipe.	1/31/14	11/15/13	The controller is removed and the set of blind flanges installed. The controller is no longer needed.	12/16/13

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11	Fluor cellar (S/E corner): Wind sock is not on the metal sleeve.	APCD/B&S	4	Re-attach and secure the wind sock.	1/31/14	11/12/13	The windsock is re-attached and secured.	12/16/13
12	1-1/2 inch discharge line from pump (P-201-C) near T-201 going into the ground was improperly wrapped for corrosion control. (Documented corroded metal flaking off.)	APCD	3	Assess integrity of the pipe. If deemed necessary, replace the pipe. Take measures to prevent future corrosion of the discharge line going underground.	1/31/14	11/12/13	Cleaned and re-wrapped the piping.	11/16/13
13	TK-204: Surface coating failure and corrosion on VRU line overhead (header running North and South).	APCD	3	Assess integrity of the pipe. Take appropriate actions, including surface coating to prevent corrosion.	1/31/14		The overhead VRU line has been cleaned and recoated.	5/1/14
14	Tote Storage Area: 5-gallon plastic container of "UCAR HTF-Inhibitor-268" was cracked-open along the side of the container. Five gallon white containers are not labeled.	APCD/B&S	3	A. Properly dispose or store material. B. Label the white containers.	1/31/14	12/9/13	The cracked container is removed and all containers are labeled.	12/16/13
15	Fire Extinguishers are missing annual inspection-#11 and the one located near V-1203.	Fire		Conduct the annual Fire Extinguishers inspection.		11/14/13	Annual inspection completed.	1/10/14
16	SCBA containers (#3 and #8) are difficult to open.	OEM	3	Repair the mechanism to open the containers.	1/31/14	12/30/13	SCBA containers were repaired.	1/10/14

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17	Sump near TK-1905 is clogged up and overflowing.	OEM	3	Unclog, clean and drain the sump.	1/31/14	11/12/13	The sump was drained and cleaned on the audit day.	1/10/14
18	SCBA are due for hydrotest or replacement: DG978091, DG126125, T65026, T64761 and T64698. Verify DG41976.	OEM	3	Hydrotest or replace the SCBAs.	1/31/14	11/21/13	SCBA hydrotests are now current and the paperwork now matches the bottles.	1/10/14
19	At F-2203, at ground level, 1" piping is installed horizontally without adequate support.	B&S	3	Provide support every 8 feet as per 2010 CPC Section 314.1, Section 314.5 and Table 3-2.	1/31/14	11/20/13	1" piping is now supported.	1/22/14
20	At LoCat Unit, between V-1201 and V-1202, Second level, plastic tie wrap is supporting stainless steel tubing.	B&S	3	Replace the plastic tie wrap with a durable means of support as per 2010 CPC Table 3-2.	1/31/14	12/17/13	The tubing is now properly supported.	1/22/14
21	At LoCat Unit, Second level, southeast of V-1201, overhead, vertical pipe clamp is loose.	B&S	3	Secure the pipe as per 2010 CPC Section 314.1, Section 314.1 and table 3-2.	1/31/14	11/20/13	The clamp is tightened.	12/16/13
22	At LoCat Unit, second level, south east of V-1201, overhead, flange bolt is not tight and appears to have a 1/4" gap between the flange and the nut.	B&S	3	Re-torque the fasteners at this flange.	1/31/14	11/16/13	The bolt is tightened.	12/16/13

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23	At the north side of west entrance to LoCat Unit, a damaged stainless steel tubing appears to have been previously been installed to a tee at a PI gage.	B&S	3	Reconnect the tubing or remove if not needed.	1/31/14	1/22/14	The damaged tubing is now removed.	1/22/14
24	Below "PLC-1808" control panel, the western most conduit installed in the bottom of the CP is not bonded and two conduits are missing supports (strut straps).	B&S	3	Bond and provide supports for the conduits as per 2010 CEC 34.30(A).	1/31/14	11/20/13	The supports are installed and the conduit is bonded.	1/22/14
25	At the second level platform, above the blower, located below E-1302, the northwest light fixture's guard is damaged with only half of the guard remains.	B&S	3	Replace the guard as per 2010 CEC 110.3(7).	1/31/14	1/29/14	The guard is replaced.	4/22/14
26	At the Eyewash Station #6, the tie wraps are supporting 3/4" steel conduit.	B&S	3	Replace the tie wraps with a durable means of support as per 2010 CPC Table 3-2.	1/31/14	11/20/13	The brackets are installed for the support.	1/22/14
27	Above Eyewash Station #6, Zone 8, the electrical enclosure is corroded at the bottom back side of the enclosure. A flat washer is installed to	B&S	3	Replace or repair the enclosure as per 2010 CEC 110.3(2) & 110.11.	1/31/14		Cleaned And recoated the enclosure.	4/22/14

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	replace the OEM arched retainer clip.							
28	In the area east of V-229, at the bottom of the vertical 8" pipe, a valve wheel is half buried in the ground.	B&S	3	Due to location at the level of the ground, the valve may need to be relocated or maintained or excavate around the wheel to provide clearance for operation as per 2010 CMC 309.0, 310.1 and 310.4.	1/31/14	11/13/13	The soil underneath the valve handle is excavated for the clearance to open/close the valve.	12/11/13
29	At V-229 overhead piping on a horizontal pipe, a valve handle is not properly installed with the handle obstructing operation of the valve. The valve will not fully open due to a vertical pipe at this location.	B&S	3	Install the valve handle properly as per 2010 CMC 309.0, 310.1 and 310.4.	1/31/14	11/13/13	The valve is car sealed open	12/16/13

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30	Grounding installed at various locations (Fire Water Tanks, Motors, etc.) appear to have utilized ground lugs that are not listed for exterior use. Also, at the Fire Water Tank, the grounding lug was removed for painting and the lug then reinstalled over the paint obstructing the positive connection by the paint coating. The Aluminum lugs and the set screws are corroded.	B&S	3	A. Verify that the lugs are code compliant or replace the lugs with listed for exterior use as per 2010 CEC 110.3(B). B. Normally, the lugs listed for exterior use have stainless steel set screws.	1/31/14		The Firewater tanks grounding areas were cleaned up with new grounding wires installed. Need to locate the motors that have the grounding lugs not listed for exterior use. Curtis Jensen to follow up.	
31	Broken glass on PI gage at K-202 Compressor.	B&S	3	Replace the PI gage.	1/31/14	12/30/13	PI gage is replaced.	1/22/14
32	At "Seep Gas" and "Crude Oil" pit, south wall, a damaged light fixture with a outlet box installed to cover the opening where part of the light fixture has been removed. The "GRS" box outlet box is not listed for the use.	B&S	3	Remove the fixture arm from the existing fixture box and install weather proof cover on the fixture box complying with 2010 CEC 110.3(B).	1/31/14	11/20/13	The fixture arm removed and a weather proof cover on the fixture box is installed.	1/22/14

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33	Below "6780 Analyzer" enclosure, there is an open conduit and a fitting with a lo-volt cable.	B&S	3	Install a grommet fitting on lo-volt cable to prevent gas migration into the conduit.	1/31/14		Disconnected to run through GCB seal.	4/22/14
34	South of "6780 analyzer", on a railing, a pressurized five gallon tank is installed. The mounting brackets on this tank are loose.	B&S	3	Tighten the mounting brackets.	1/31/14	3/15/14	The tank is properly secured.	4/9/14
35	The Air Compressors, K-204A/B/C do not have a service disconnect located within the sight of the compressors.	B&S	3	Locate the disconnect within the sight of these compressors as per 2010 CEC 430.75, 430.101, 430.102(A)&(B) and 430.103.	1/31/14		Existing service disconnects are located on the right side of the compressors. K-204 is currently out of service.	5/8/14
36	At 1012-SS, stainless steel tubing installed in gravel is bumped out of the location. This tubing is attached to the equipment structural support (vertical) via tie wraps.	B&S	3	Secure the tubing by permanent means to prevent dislocation in the future.	1/31/14		Unable to locate unsecured tubing. Curtis to follow up	
37	At the loading rack area, signage for the fire extinguisher is faded and illegible.	B&S	3	Remove and replace the faded sign.	1/31/14	12/30/13	A new sign is installed.	1/22/14
38	Sign on the safety locker in the LoCat Unit is faded.	B&S	3	Replace the faded sign.	1/31/14	12/5/13	The safety locker is removed.	12/16/13



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39	Broken PI gage @ Sales Gas control valve.	B&S	3	Replace the broken gage.	1/31/14	12/28/13	PI gage is replaced.	1/22/14
40	The Eductor inlet lines are corroded at V-1201 and V-1202.	B&S	3	Evaluate and coat the corroded lines.	1/31/14	1/22/14	These lines are included in the plant wide coating program.	1/22/14
41	Surface corrosion @ the pipe support between V-1201 and V-1202.	B&S	3	Evaluate and coat the corroded area.	1/31/14	1/22/14	These lines are included in the plant wide coating program.	1/22/14
42	Unsupported electrical conduit near the pipe support between V-1201 and V-1202.	B&S	3	Provide support for the electrical conduit.	1/31/14		Supports are installed now.	4/22/14
43	"Caution" sign is faded on a line across from TK-1901.	B&S	3	Replace the faded sign.	1/31/14	12/30/13	The sign has been upgraded.	1/22/14
44	Leak (liquid puddle) @ Wildon Pump near TK-1903.	B&S	3	Repair the leak.	1/31/14	12/28/13	The leak is repaired.	1/22/14
45	"Caustic" leak on top of the Caustic Tank. Also, the "Danger" sign is faded.	B&S	3	A. Evaluate the cause and clean top of the tank. B. Replace the faded sign.	1/31/14	12/30/13	The Danger sign is upgraded. The lid is cleaned and re-painted. There was no leak, the condensed caustic vapor turned the lid white. Initiated a PM to keep the lid clean.	1/22/14
46	Drain sump is full underneath the Sulfur Tower.	B&S	3	Drain the sump and keep the sump empty.	1/31/14	11/12/13	The sump was drained on the audit day.	12/16/13
47	Car seals are missing on PSV-345 and PSV-516 block valves.	B&S	3	Install the car seals.	1/31/14	11/12/13	Car seals installed on the audit day.	11/12/13

**2013 VENOCO EOF SIMQAP AUDIT MATRIX**

Audit Dates: 11-12 & 12-3, 2013			Revision Date: May 23, 2014					
Item #	Audit Findings	Dept.	Priority #	Recommendations	Due	Done	Status	Accepted by SSRRC
48	A bottle full of liquid is not labeled in the Methanol Drum containment area.	B&S	3	Label the bottle or discard if not needed.	1/31/14	11/13/13	The bottle is removed from the Methanol Drum Containment Area.	12/16/13
49	TK-205 is not grounded and the grounding base is corroded.	B&S	3	Clean the grounding base and ground the tank.	1/31/14	11/13/13	The ground base cleaned and the grounding wire attached to the tank.	12/16/13
50	Pi gage at Glycol Pump (east) is "fogged" up and is not legible.	B&S	3	Replace the PI gage.	1/31/14	12/16/13	The PI gage is removed and plugged, not deemed necessary by the operations.	12/16/13
51	The Shipping Pump, P-203 and Pumps, P-201A/B/C are not grounded.	B&S	3	Ground the P-203 and P-201A/B/C pumps and ensure that all other pumps in the facility are grounded.	1/31/14		Pump P-203 is grounded. P-201 A/B/C are not grounded. Venoco is asking for these pumps they are in Produce Water Service. These pumps are located in the Class Division 2 Area. Curtis Jensen to follow up.	
52	Pump P-201C is not anchored.	B&S	3	Anchor the pump.	1/31/14		Motor shim is bolted now and the pump is bolted to the skid.	4/22/14
53	"H <sub>2</sub> S" type odor on a walkway near the Tank T-204.	B&S	3	Investigate the source of the odor and remediate.	1/31/14	12/30/13	Checked the area for a week. Could not pick-up any H <sub>2</sub> S smell.	1/22/14

**2013 VENOCO EOF SIMQAP AUDIT MATRIX**

Audit Dates: 11-12 & 12-3, 2013			Revision Date: May 23, 2014					
Item #	Audit Findings	Dept.	Priority #	Recommendations	Due	Done	Status	Accepted by SSRRC
54	Broken PI gage @ H-207 on a pilot gas line.	B&S	3	Replace the broken PI.	1/31/14	12/16/13	The PI gage is replaced.	12/16/13
55	"No Smoking" sign at the Loading Rack is faded.	B&S	3	Replace the faded sign.	1/31/14	12/30/13	Removed the "No Smoking" sign since EOF is a "No Smoking" Facility.	1/22/14
56	Faded "Danger" signs on all 12.4 kV Transformers.	B&S	3	Replace the faded signs.	1/31/14		The "Danger" signs are replaced.	4/22/14
57	Two Incident Reports are still open.	B&S	3	Close out all Incident Reports in a timely manner.	1/31/14	1/22/14	Both incidents have been closed.	1/22/14
58	Annual Farwest Inspection & Testing Cathodic Protection Report, dated June 2013 has recommendations that are not addressed.	B&S	3	Address the Farwest recommendations for the Cathodic Protection System.	1/31/14		All EOF recommendations have been addressed.	4/22/14
59	Safety devices inspection and testing records review comments were provided and discussed with J. Dimizio.	B&S	3	Address the comments provided during the audit.	1/31/14	5/1/14	The comments provided during the audit have been addressed.	5/1/14
60	QA/QC documents were reviewed with Bob Van Nostrand. Comments were provided and discussed with Bob Van Nostrand. Number of MTRs for the sour service have higher Sulfur Content than the	B&S	3	Ensure that the sour service equipment (Vessels, piping, etc.) comply with the current (latest edition) NACE MR-01-75 requirements including the Hardness and the Sulfur Content. The NACE MR-01-75, Section 8 requires less than	1/31/14	1/22/14	The QA/QC program is in place to ensure that all future sour service equipment will be in compliance with the current NACE-MR-02-75 requirements.	1/22/14

**2013 VENOCO EOF SIMQAP AUDIT MATRIX**

Audit Dates: 11-12 & 12-3, 2013			Revision Date: May 23, 2014					
Item #	Audit Findings	Dept.	Priority #	Recommendations	Due	Done	Status	Accepted by SSRRC
	allowed by the NACE MR-01-75.			0.003% Sulfur for Flat Rolled Products; 0.01% Sulfur for Seamless Products and 0.025% Sulfur for the Forged Products.				
61	DOT Manuals are not re-validated for the Hazardous Liquid and Gas Pipelines.	B&S	3	Re-validate the manuals and provide copies of the manuals for review.	1/31/14	4/25/14	The manuals have been submitted for review. Review comments will be followed up with C.Fox	5/23/14
62	John Dimizio is deficient in the Refresher Training for the DOT Procedures.	B&S	3	Provide Refresher Training to John Dimizio to comply with the DOT requirements.	1/31/14	4/16/14	John Dimizio's Refresher Training is current now.	4/22/14
63	Provided and discussed the updates for the Driver/Operator Checklist with Walt McCarty for the LPG/NGL Truck loading, reflecting the current requirements.	B&S	3	Update the Venoco's Driver/Operator Checklist reflecting the current codes.	1/31/14	2/11/14	The Checklist has been updated	4/9/14
64	Monthly Inspection Reports were reviewed and discussed with Walt McCarty. There are number of action Items still	B&S	3	Address the open Action Items and close them in a timely manner.	1/31/14			

**2013 VENOCO EOF SIMQAP AUDIT MATRIX**

Audit Dates: 11-12 & 12-3, 2013			Revision Date: May 23, 2014					
Item #	Audit Findings	Dept.	Priority #	Recommendations	Due	Done	Status	Accepted by SSRRC
	open.							

**\* Priority Legend:**

- 1- Significant potential for serious: personal injury, negative environmental impact, property damage or hazardous material release.
- 2- Moderate potential for serious: personal injury, negative environmental impact, property damage or hazardous material release.
- 3- Low potential for serious: personal injury, negative environmental impact, property damage or hazardous material release.
- 4- Housekeeping and other maintenance items.

**2012 VENOCO EOF SIMQAP SAFETY AUDIT MATRIX**

#	Audit Finding	Depart .	Priority *	Recommendation s	Venoco Status	Due	Done	Accept SSRRC
1	Four unlabeled compressed air canisters (white color) located next to a sign that read "Breathing Air".	APCD B&S	4	Label compressed air canisters.	Done	2/14/13	12/10/12	1/9/13
2	No emergency or spill response instructions posted next to the diesel fuel pump.	APCD	4	Post instructions in the event of a diesel spill.	Instructions in Oil spill / EAP; complete per 1/17/13 site inspection	2/14/13	11/27/12	1/17/13
3	Spill kit materials are stored in a white trailer (#2) that does not have any signage identifying its contents or purpose.	APCD	4	Post signage on the outside of the trailer to identify that it contains spill kit materials.	Done	2/14/13	12/9/12	1/9/13
4	A 5/8" (or 3/4"?) stainless steel water line located next to V-1201 in the LoCat Area was vibrating against the support structure.	APCD	4	Fasten the water line with a plastic tie-down.	Done	2/14/13	12/7/12	1/9/13
5	A loose bolt (or stud) was observed next to the LoCat Eductor.	APCD	3	Actions taken in the field (nuts tightened to secure the bolt).	Done	1/10/13	11/27/12	1/9/13
6	In the LoCat Area, a number of bolts (studs) were not secured past the nut. This is also the case, throughout in the facility.	APCD OEM B&S	3	Properly secure the bolts at least two threads past the nut.	Procedure written. Will address as flanges are worked on during shutdown and maintenance.	1/10/13	12/14/12	1/9/13
7	Metal piping located next to E-210B requires coating.	APCD	4	Apply surface coating to prevent corrosion.	Done	2/14/13	12/7/12	1/9/13
8	Car seal came off the PSV block valve near V-210A.	APCD	3	Properly fasten car seal to the valve.	Done	1/10/13	12/11/12	1/9/13
9	Metal piping located next to Suction scrubber V-235 requires coating.	APCD	4	Apply surface coating to prevent corrosion.	Done	2/14/13	12/7/12	1/9/13

**2012 VENOCO EOF SIMQAP SAFETY AUDIT MATRIX**

#	Audit Finding	Depart .	Priority *	Recommendations	Venoco Status	Due	Done	Accept SSRRC
10	Improperly labeled red container in the hazardous waste area. (Read: Gasoline) (Contained: Lube Oil)	APCD B&S	4	Labels the containers with proper commodity in the Hazmat storage area.	Container removed.	2/14/13	Done	1/9/13
11	Unsecured flammable storage cabinets near H-207.	APCD	4	Recommend securing the cabinets to the fence to prevent them from falling over in the event of seismic event.	The cabinets are now secured.	2/14/13	12/11/12	1/9/13
12	Hearing Protection Sign missing by TK-3103.	OEM	4	Install a sign.	Done	2/14/13	12/5/12	1/9/13
13	5 minutes SCBA bottle by parking area in front of LoCat was last hydro tested 08/01.	OEM	3	Conduct Hydro Test.	Seacorp has removed the bottle for Hydro. Bottle is not in plant.	1/10/13	Done	1/9/13
14	First Aid Kit contained expired ointment.	OEM	3	Ensure that all ointments, eye wash and other liquids are current to prevent possible injury and place inspection of kits on maintenance schedule.	The First Aid Kit contents are all current. Need maintenance schedule; all 1st aid items with expiration dates removed from satellite first aid kits.	3/14/13	3/1/13	3/28/13
15	Anchor bolt missing by filter/separator in LoCat area.	OEM	3	Replace Anchor Bolt.	The anchor bolt is replaced.	3/14/13	3/12/13	3/28/13
16	Vessel V-210 is missing label.	OEM	4	Label with commodity and NFPA.	Done	2/14/13	12/7/12	1/9/13
17	Second Stage Grace unit is Out of Service.	OEM	4	Label OOS so that it can be seen from the road.	Done	2/14/13	12/7/12	1/9/13
18	HazMat waste overflowing and cover is not secure.	OEM COG	4	Dispose and properly store oil filters.	The waste can cover is secured and labeled.	3/14/13	3/1/13	3/28/13

**2012 VENOCO EOF SIMQAP SAFETY AUDIT MATRIX**

#	Audit Finding	Depart .	Priority *	Recommendation s	Venoco Status	Due	Done	Accept SSRRC
19	Protective chain around Iron Sponge pit was on the ground and not secured.	OEM	3	Repair posts and secure chain to prevent entry into pit.	The chain is secured around the pit.	3/14/13	3/7/13	3/28/13
20	One gallon buckets in LoCat area on concrete is not properly labeled and stored	COG	4	Label and store gallon buckets in a storage locker.	They belonged to contractor from the Shut Down, all removed.	2/14/13	12/17/12	1/9/13
21	Inadequate spill containment at the "Proving Trough". Oil spilling onto ground during sampling.	COG	3	Provide secondary containment or liner on the grounds at the "Proving Trough".	Done. Containment is adequate, again just came off Shut Down. Area is cleaned up	1/10/13	12/14/12	1/9/13
22	Improper storage of florescent tubes on gravel.	COG	4	Properly store and dispose of florescent tubes.	Removed	2/14/13		1/9/13
23	Vessel V-214 has conflicting NFPA identification placards	FIRE B&S	3	Remove placard that does not apply to vessel.	Done; complete per Fire inspection on 12/19/12	1/10/13	12/6/12	12/19/12
24	Conduit not properly supported/secured: A) Vertical riser at P-1512 (> 10') (Lo-Cat) B) Overhead beside stairway near TK-1905 (east of Lo-Cat) C) 3/4" vertical at York skid (near controller) D) 3/4" vertical to fire eye/flame sensor of H-205 incinerator E) Horizontal PVC (water piping) by 1901 (Lo-Cat north wall).	B&S	3	Repair/reinstall clamp/etc.; support/secure conduit per CEC 344.30 (Item E, PVC pipe securing is required at 4' maximum spacing, CPC Table 3-2).	Done	1/10/13	C 3/1/13	A 1/9/13 B 1/9/13 C 3/28/13 D 1/9/13
25	At Inlet Sour Gas Vessel, K-TEK flex conduit fittings are "finger-loose".	B&S	3	Make fittings securely tight, CEC 110.3, 110.12, 300.11.	The fittings are tightly secured.	3/14/13	3/1/13	3/28/13



**2012 VENOCO EOF SIMQAP SAFETY AUDIT MATRIX**

#	Audit Finding	Depart .	Priority *	Recommendation s	Venoco Status	Due	Done	Accept SSRRC
26	Unused opening at "peckerhead"/J-box of removed P-1512, Sump Pump (Lo-Cat).	B&S	3	Cap/plug all unused electrical equipment openings, remove j-box/cap conduit, CEC 110.12, 501.15.	Done	1/10/13	12/10/12	1/9/13
27	Stop/slow/start switch sign at E-225 is removed from switch cover.	B&S	4	Reinstall switch identifier, CEC 110.22.	Done	2/14/13	12/8/12	1/9/13
28	12"x12" J-box is supported only by raceways at York Skid (by controller).	B&S	3	Install independent J-box support, CEC 314.23.	Done	1/10/13	12/8/12	1/9/13
29	Exterior receptacle cover stays open (broken) at C-train storage container (north side near V-209).	B&S	4	Repair or replace with weatherproof "bubble cover", CEC 406.8(B), 110.3.	Done	2/14/13	12/11/12	1/9/13
30	Fire Eye devices are installed without conduit seal fitting.	B&S	3	Verify devices are arcing style & verify location is "unclassified" or install conduit seal, CEC 501.15.	The Fire Eye is installed with conduit sealing.	1/10/13	12/11/12	3/28/13
31	Rear Gate ESD installed with "site fabricated" cover/guard.	B&S	3	Verify plunger style ESD switch is rated for exterior wet location, replace or provide weatherproof enclosure if necessary, CEC 110.3, 404.4.	The exterior cover is weatherproof.	1/10/13	12/12/12	3/28/13

**2012 VENOCO EOF SIMQAP SAFETY AUDIT MATRIX**

#	Audit Finding	Depart .	Priority *	Recommendations	Venoco Status	Due	Done	Accept SSRRC
32	Lab has a mixture of explosion-proof wiring methods/devices and standard electrical wiring/devices/equipment.	B&S	3	Verify lab electrical classification and that operations are consistent with CEC Article 500; modify use, conditions, electrical equipment as necessary. Provide Lab Area Classification for review.	Venoco is currently addressing this new issue, and needs additional time to design and implement any required modifications. We suggest a new due date.	6/13/13		
33	Coat the Solution Overflow Line (4") with a corroded Tee and severe surface corrosion. If it is Out of Service, it is not marked OOS.	B&S	4	Coat the line and if it is Out Of Service with the associated equipment, mark them OOS.	Line marked OOS.	2/14/13	Done	1/9/13
34	Car seals are not installed on number of PSV block valves on the K-201 Compressor System (V-205, v-206, V-207, etc.)	B&S	3	Install missing car seals on all PSV block valves in the K-201 system.		1/10/13	12/12/12	1/9/13
35	NFPA label on V-241 is faded.	B&S	4	Replace the faded label.	Done	2/14/13	12/6/12	1/9/13
36	Standing liquids present underneath E-208 and H-202 blower (York Skid).	B&S	4	Remove the standing liquids.		2/14/13	12/12/12	1/9/13
37	Failed coating on V-214.	B&S	4	Coat V-214.	Done	2/14/13	12/6/12	1/9/13
38	The line labeled "Liquids Off NGL-178" from V-214 is missing insulation at two locations. The open spots show chipped insulation.	B&S	4	Repair and replace the insulation on the line.		2/14/13	12/13/12	1/9/13
39	Sump S-201 is Out of Service.	B&S	4	Label the sump OOS.	The Sump is labeled OOS	3/14/13	3/1/13	3/28/13
40	A blue colored drum is not labeled and a rust colored drum has a faded label in the Hazmat storage area.	B&S	4	Label the drum and replace the faded label.	Done	3/14/13	5/13/13	

**2012 VENOCO EOF SIMQAP SAFETY AUDIT MATRIX**

#	Audit Finding	Depart .	Priority *	Recommendation s	Venoco Status	Due	Done	Accept SSRRC
4 1	The solvent cans (3 gals) are not labeled in the lab.	B&S	4	Label the chemical solvent cans in the lab.	Done	2/14/13	12/6/12	1/9/13
4 2	The incident reports are not closed out and complete.	B&S	3	Close out complete the Incident Reports.	Done	1/10/13	12/10/12	
4 3	The checklists provided under General Work Permit and Hot Work Permit are generic in nature and not project specific.	B&S	3	A project specific Job Safety Analysis (JSA) should be conducted that may include the generic checklist. OSHA 3071 2002 (Revised) provides details and guidelines for the JSA (or JHA- Job Hazard Analysis).	Our existing permit system is sufficient per applicable codes. City letter dated 3/11/13 recommends Venoco institute a JSA program.	1/10/13	12/18/12	3/14/13
4 4	The five operators are due for the Operator Refresher Training	B&S	3	Provide Operator Refresher Training to the operators.	The training records are up to date for the Operators Refresher Training.	1/10/13	12/17/12	3/28/13
4 5	3" isolation block valve on PSV-150 is inoperable.	B&S	3	Replace or repair the block valve.	Need to wait till next S/D for 2013. Include it in the Shut Down list.	1/10/13	11/27/12	1/9/13
4 6	PSV-325 has a leaky isolation block valve.	B&S	3	Repair or replace the leaky block valve.	Venoco will have the block valve changed out when they will put K-201 back in service. K-201 is currently not being used.	1/10/13	11/27/12	1/9/13

**2012 VENOCO EOF SIMQAP SAFETY AUDIT MATRIX**

#	Audit Finding	Depart .	Priority *	Recommendation s	Venoco Status	Due	Done	Accept SSRRC
47	The current checklist (revised in 2011) is not used for the Tank Truck Loading of NGL & LPG.	B&S	3	Replace the check list with the revised (current) checklist and train the operators. Also, update the SIMQAP binder.	Done	1/10/13	12/18/12	1/9/13
48	EOF Refresher Operator Training Record Form does not include the Line 96 operation.	B&S	3	Update the Operator Refresher Training Record Form to include the Line 96 operation. Update the SIMQAP binder.	Completed	2/14/13	1/10/13	1/10/13
49	The safety devices testing records were reviewed and the comments were provided and discussed with J. Dimizio.	B&S	3	Address the safety devices records review comments.	Completed	2/14/13	1/10/13	1/10/13
50	Semiannual Cathodic protection Survey has not been conducted.	B&S	3	Conduct the survey which is due now and provide copy for review.	Cathodic protection survey is due to be done annually. The 2012 annual survey was conducted in May 2012, and is still current. This finding should be removed.	3/14/13	11/27/12	3/14/13
51	DOT Oil & Gas Pipelines Manuals including the PSOM have not been updated and revalidated.	B&S	3	Update and revalidate the manuals and provide copies for review.	In progress, with new pipeline coordinator.	6/13/13		

**2012 VENOCO EOF SIMQAP SAFETY AUDIT MATRIX**

#	Audit Finding	Depart .	Priority *	Recommendation s	Venoco Status	Due	Done	Accept SSRRC
5 2	<p>QA/QC review of the projects identified the following deficiencies:</p> <p>A. Sulfur contents of the materials do not comply with the NACE-MR-0175 requirements for the sour service</p> <p>B. Welder Qualification Records do not show current validity as required by the code</p> <p>C. Missing charts for the hydrostatic tests.</p>	B&S	3	<p>A. Comply with the NACE-MR-0175 requirements for the Sulfur Content for Flat Rolled 0.003% max, for Seamless 0.01% max and for Forging &amp; Casting 0.025% max.</p> <p>B. Require contractors to provide the proper welding documents complying to the requirements.</p> <p>C. Require contractors to use and provide the charts for the hydrostatic tests.</p>	<p>A. Venoco has sent letters to the contractors to comply to this requirement.</p> <p>B. Only one contractor is deficient . Venoco is working with this contract or to correct errors. In the meantime, this contract or is barred from working at EOF.</p> <p>C. One QA/QC was missing hydrostatic test charts. Contract or has been advised and agreed to provide charts in future work.</p>	1/10/13	<p>A. 12/11/12</p> <p>B. 1/9/13</p> <p>C. 1/9/13</p> <p>A. 12/12/12</p> <p>B. 1/9/13</p> <p>C. 12/14/12</p>	<p>A. 12/11/12</p> <p>B. 1/9/13</p> <p>C. 1/9/13</p>

**2012 VENOCO EOF SIMQAP SAFETY AUDIT MATRIX**

#	Audit Finding	Depart .	Priority *	Recommendation s	Venoco Status	Due	Done	Accept SSRRC
53	Monthly facility inspections have outstanding open items since January 2012.	B&S	3	Follow up and close out the open items in a timely manner.	Old open items closed out.	3/14/13	3/12/13	3/28/13
54	NDT inspections reports have number of outstanding items still not addressed.	B&S	3	Address and close out the outstanding items in a timely manner.	Venoco has made a significant progress in addressing the action items.	6/13/13		

**2011 VENOCO EOF SIMQAP Audit Matrix**

#	Audit Finding	Dept.	Priority*	Recommendations	Status	Due	Done	Accepted SSRRC
<b>Ellwood Onshore Facility (EOF)</b>								
1	Diesel Fire Pump not operating to standard per "Annual Fire Pump Acceptance Test"	FIRE	2	Repair or replace engine or entire pump & engine unit as noted on Joy Equipment Protection Inc. Invoice	Completed	11/1/11	11/1/11	11/3/11
2	Signage for entering a hazardous area not visible	OEM	3	Move so that sign is visible before entering area	Completed	1/12/12	3/8/12	3/8/12
3	V-1203 Missing Name Plates	OEM	3	Replace Name Plates	Deleted	1/12/12	Deleted	Deleted
4	NFPA label faded or missing in the following areas: OOS in LoCat area, E225, E210B, TK 207, TK8265	OEM	3	Replace labels	Completed	1/12/12	12/7/11	12/7/11
5	HazWaste container on Chemical Storage dock has label which is not completed	OEM	3	Fill out label	Completed	1/12/12	12/7/11	12/7/11
6	Chemical Storage dock contains flammable wood railroad tie	OEM	3	Replace wood railroad tie in Chemical Storage dock with non-flammable material		1/12/12		2/9/12
7	SCBA #6 missing current inspection information	OEM	3	Include current inspection information		1/12/12		2/9/12
8	Cable Gland doesn't seal to cable at Total Flow Meter by V-1203.	B&S	3	Replace with proper cable gland, CEC 110.3, 314.17(A).	Completed	1/12/12	11/29/11	11/29/11
9	Opening to conduit body due to broken gasket at Pump M-2402.	B&S	3	Replace gasket to seal fitting, CEC 110.3,	Completed	1/12/12	5/10/12	5/10/12
10	Lo-cat corrosion: raceways, supports, bonding conductors & lugs.	B&S	3	Visual survey to identify potential maintenance needs, CEC 500.8, 300.6. Repair/replace as necessary.	Completed	1/12/12	11/29/11	11/29/11
11	PVC conduit jacket deteriorated, ½" FMLC for 5 HP oil pump at K-206 gas compressor.	B&S	3	Replace, CEC 501.10, 350.10, 110.12.	Completed	1/12/12	11/29/11	11/29/11

**2011 VENOCO EOF SIMQAP Audit Matrix**

#	Audit Finding	Dept.	Priority*	Recommendations	Status	Due	Done	Accepted SSRRC
12	Conduit seal fitting at K-206 Cooling Fan Switch is not identified as being poured/sealed.	B&S	3	Confirm requirement for conduit seal, CEC 501.15	Completed	1/12/12	11/29/11	11/29/11
13	Conduit seal fitting is missing at V-231 Temperature instrument.	B&S	3	Install required seal as specified on the instrument, CEC 501.15.	Completed	1/12/12	11/29/11	11/29/11
14	Open/exposed wiring connections are in the classified hazardous area at V-209, Amtek temp. gauge	B&S	3	Correct with a hazardous location approved wiring method, CEC 501.10.	Completed	1/12/12	11/29/11	11/29/11
15	Open 2" conduit, at overhead above TK-3101	B&S	3	Cap/plug opening, CEC 501.10, 500.7.	Completed	1/12/12	11/29/11	11/29/11
16	PSV-365 block valve is not Car Sealed Open (CSO).	B&S	3	CSO the block valve.	Completed	1/12/12	12/7/11	12/7/11
17	Tank, T-206 is not grounded.	B&S	3	Ground T-206.	Completed	1/12/12	7/10/12	7/10/12
18	York skid has standing liquids.	B&S	3	Remove the standing liquids.	Completed	1/12/12	12/7/11	12/7/11
19	Sump(S-201) near the loading rack is full with liquids and is on the verge of overflowing.	B&S	3	Remove liquids from the sump.	Completed	1/12/12	12/7/11	12/7/11
20	Conduct biennial motor carrier survey.	B&S	3	Ellwood Flammable Liquids Transportation Safety Program (EFLTSP) Risk Prevention Plan requires biennial survey. The past surveys have not been submitted to the county for review.	Under Review	1/12/12	12/3/12	12/3/12
21	The fence H2S detector calibration gas expiration date could not be verified.	B&S	3	Confirm the validity of the calibration gas.	Completed	1/12/12	3/8/12	3/8/12
22	PSV-150 isolation valve does not close.	B&S	3	Replace/repair the isolation valve.	Deleted	1/12/12	Deleted	Deleted
23	PSV-325 is leaking.	B&S	3	Repair the PSV.	Completed	1/12/12	3/8/12	3/8/12



**2011 VENOCO EOF SIMQAP Audit Matrix**

#	Audit Finding	Dept.	Priority*	Recommendations	Status	Due	Done	Accepted SSRRC
24	The MOC document does not include detail description including the reason(s) why the change is warranted.	B&S	3	Provide detail description for the MOCs.	Deleted	1/12/12	Deleted	Deleted
25	All QA/QC Packages –  The Welding Procedure Specifications, (WPSs), Procedure Qualification Records (PQRs) and Welder Qualification Records do not show current code compliance. Number of MTRs do not meet the Sulfur requirements for flat rolled, seamless and forged materials.	B&S	3	Some of the specifications show compliance with 1995 ASME Section IX. Verify and update all specifications and records confirming that they comply with the current codes. Ensure that the MTRs meet the NACE requirements of 0.003% Sulfur for Flat Rolled, 0.01% Sulfur for Seamless and 0.025% Sulfur for Forged materials.	Completed	1/12/12	5/10/12	5/10/12
26	QA/QC: V-1201 Repair-Overlay weld metal build up  The welding overlay maps are not legible. WQR for Efrain Carbajal is not signed. Also, It references 1995 ASME Section IX and not the current code. .	B&S	3	Include legible overlay maps (from IESCO) in the QA/QC package. Update WQR.	Completed	1/12/12	5/10/12	5/10/12
27	QA/QC: V-1203 Repair-Overlay weld metal build up  The welding overlay maps are not legible. WQR for Napoleon Barber references 1995 ASME Section IX and not the current code.	B&S	3	Include legible overlay maps (from IESCO) in the QA/QC package. Update WQR.	Completed	1/12/12	5/10/12	5/10/12

**2011 VENOCO EOF SIMQAP Audit Matrix**

<b>#</b>	<b>Audit Finding</b>	<b>Dept.</b>	<b>Priority*</b>	<b>Recommendations</b>	<b>Status</b>	<b>Due</b>	<b>Done</b>	<b>Accepted SSRRC</b>
28	The DOT and PSOM Oil & Gas Pipeline manuals are not revalidated for 2011.	B&S	3	Revalidate the DOT and PSOM manuals and submit the revisions for review.	Completed	1/12/12	5/10/12	5/10/12
29	The NDT inspections recommendations need to be prioritize and implemented.	B&S	3	Provide prioritization and implementation schedule matrix for review.	Completed	1/12/12	5/10/12	5/10/12

Ellwood Marine Terminal Facility (EMT)

No audit items were noted for the EMT