

Southern California Gas, Aliso Canyon Facility
Proposed Title V Permit Renewal
Public Information Meeting
Wednesday, May 29, 2019
California State University, Northridge

Summary of Comments Received at the Public Information Meeting and South Coast AQMD's Responses to the Comments

The South Coast Air Quality Management District (South Coast AQMD) on May 29, 2019 held a public information meeting at California State University, Northridge campus, to inform the public about the status of the proposed Title V permit renewal (application no. 604230) for Southern California Gas (SoCalGas) Aliso Canyon facility (facility ID 800128) and to solicit public comments. More than 18 individuals commented during the public meeting, while three commenters submitted comments via email. Because of the commonality among the subjects covered during the meeting, South Coast AQMD staff grouped all the public comments in seven broad categories. Summary of the comments received and South Coast AQMD staff's responses to the comments are provided below:

Group 1 Comments

South Coast AQMD's notification system for the public meeting is inadequate. Several public members complained that the public and the neighborhood close to the facility were not informed of meeting ahead of time and did not have time to review the proposed Title V permit and the related documents. Some claimed that they got the notice only a day before the meeting.

South Coast AQMD's Response:

The South Coast AQMD conducted extensive outreach for the May 29 Public Information Meeting. This included:

1. Emails and mailings to community stakeholders (neighborhood council & community organizations), to staff of 13 elected officials who represent the area, email blasts to over 30,000 addresses in the zip codes surrounding the facility, and mailing to 583 addresses of complainants.
2. Meeting and conference calls including announcement at Porter Ranch Neighborhood Council meeting (notice was included in their e-newsletter), and conference call briefing for staff of local, state and federal elected officials who represent the area,.
3. Other notifications included posting flyers at two Starbucks in the community, providing 100 copies of flyer to Save Porter Ranch, posting on South Coast AQMD web page and calendar, and posting on South Coast AQMD social media.

Most of the South Coast AQMD outreach was conducted several weeks in advance of the meeting, however the final batch of mailing was done 1-week prior to the meeting, which may have resulted in a short notice for a few community members.

It is important to note that no request for public hearing was received when the proposed Title V permit renewal was issued for public comments on October 9, 2018. Typically, the South Coast AQMD holds public hearing on Title V permits when there is a valid request for public hearing made within the time frame indicated in the public notice. However, for the Aliso Canyon proposed Title V permit renewal, although there was no request for public hearing, the South Coast AQMD voluntarily decided to hold the public information meeting because several commenters requested such a meeting.

Group 2 Comments

SoCal Gas should install safety shutoff valves at the base of the wells to prevent another blow out in the future, and concerns about the safety of the wells particularly during earthquakes.

South Coast AQMD's Response:

The installation of safety valves at the bottom of the wells is not within the regulatory purview of the South Coast AQMD and therefore, cannot be included in the proposed Title V permit renewal. The proposed Title V permit issued by the South Coast AQMD covers above ground equipment, the operation of which may result in issuance of air contaminants. Additionally, the proposed Title V permit includes various monitoring devices to ensure the proper operation of such equipment. It also requires the facility to employ a Leak Detection and Repair program to minimize fugitive emissions from above ground well components such as valves, flanges, etc. The gas wells and the associated safety system are regulated by Division of Oil, Gas and Geothermal Resources (DOGGR). Therefore, comments regarding the installation of safety valves at the bottom of the wells has been conveyed to DOGGR for their consideration.

Group 3 Comments

South Coast AQMD stopped monitoring methane and benzene emissions. Residents commented that they believe the Aliso Canyon facility is still emitting pollutants and are frustrated with the lack of monitoring in the area. Test information should be shared and made available online. Some commenters asserted that the South Coast AQMD is hiding monitoring data from the public.

South Coast AQMD's Response:

The South Coast AQMD and California Air Resources Board (CARB) conducted extensive monitoring at the Aliso Canyon facility and in the Porter Ranch community both during the gas leak and after the well was sealed. Data collected by both agencies

continues to be available on their respective websites (South Coast AQMD <http://www.aqmd.gov/home/news-events/community-investigations/aliso-canyon-update/air-sampling>; CARB https://ww3.arb.ca.gov/research/aliso_canyon/community_methane_monitoring.htm). The South Coast AQMD's air sampling and monitoring activities included air sample collection during complaint investigations, air monitoring activities at fixed sites in the community, continuous Hydrogen Sulfide monitoring, mobile methane measurement surveys, as well as monitoring of other toxic air contaminants.

South Coast AQMD and CARB staff jointly developed a set of criteria to determine when air quality in the communities surrounding the Aliso Canyon facility returned to typical conditions. This criteria has been available on South Coast AQMD's website at <http://www.aqmd.gov/home/news-events/community-investigations/aliso-canyon-update/air-quality-criteria>.

Air monitoring by South Coast AQMD and CARB started in October 2015 when the ruptured well was actively leaking, and ambient methane levels were significantly higher than basin wide average methane concentrations. Air monitoring continued even after the gas leak was sealed in February 2016 and the methane levels were significantly reduced and gradually reached near background levels. It was only after the ambient air monitoring showed that the emissions were consistently within South Coast AQMD's and CARB's air quality criteria over an extended period of time that the South Coast AQMD began to gradually scale down and eventually terminate its monitoring activity in June 2017. A document summarizing the air monitoring results from all fixed site and mobile measurements conducted by CARB and the South Coast AQMD between October 2015 and June 2017 can be found at <http://www.aqmd.gov/docs/default-source/compliance/aliso-cyn/report/executive-summary.pdf?sfvrsn=4>.

The mobile air monitoring surveys were conducted throughout the Porter Ranch community for more than one year after the leaking well was sealed and indicated methane concentrations were similar to the background levels. While some fixed monitoring sites were removed in late July 2016, South Coast AQMD continued its stationary and mobile air monitoring efforts until June 2017. Further, SoCalGas has installed eight permanent infrared monitors on the southern perimeter of the Aliso Canyon Facility and will continue monitoring methane concentrations in real-time. The data from these fence-line monitors are displayed on a publicly-available website (<https://socalgas.esriemcs.com/MethaneMonitoring>).

The South Coast AQMD will continue to review data from existing continuous methane monitors, respond to any air quality concerns, conduct periodic on-site inspections, and re-deploy monitoring efforts, if warranted. **In response to comments received at the Public Information Meeting on May 29, 2019, South Coast AQMD conducted mobile methane measurements on June 5, 2019 in the Porter Ranch community. The results (shown below) indicate methane levels remain at background levels (~2 ppm) throughout the Porter Ranch community.** The results from all mobile methane monitoring are available at <http://www.aqmd.gov/docs/default-source/compliance/aliso->

[cyn/mobile-methane-maps/porter-ranch---all-maps-\(06052019\)_v2.pdf?sfvrsn=6](https://www.southcoastairquality.org/cyn/mobile-methane-maps/porter-ranch---all-maps-(06052019)_v2.pdf?sfvrsn=6) (the June 5, 2019 methane monitoring results are on page 118, and also shown below).



It is important to note that in March 2017, CARB adopted new regulations for crude oil and natural gas facilities. Under the new regulations, the SoCalGas Aliso Canyon facility must implement a monitoring program which includes leak detection and repair, ambient air monitoring and daily or continuous leak monitoring at injection/withdrawal wellheads. South Coast AQMD, under a signed Memorandum of Agreement with CARB, has been delegated the authority to enforce this regulation and conduct routine inspections of permitted and non-permitted equipment with focus on leak detection and repair program to ensure the facility is operating in compliance with the regulation. The requirement for the SoCalGas Aliso Canyon facility to comply with the aforementioned CARB regulations is now reflected in the proposed Title V permit renewal.

Group 4 Comments

Residents are concerned about the health effects of exposure to natural gas and want to know about the status of the health study on the impacts of the Aliso Canyon gas leak.

South Coast AQMD's Response:

In 2017, the South Coast AQMD reached a settlement agreement with SoCalGas that allocated \$1 million toward a health study of the impacts of the well rupture at Aliso Canyon and the resulting emissions. In August 2018, the California Attorney General, the County of Los Angeles, and the City of Los Angeles reached a settlement agreement with SoCalGas that allocated \$25 million toward an extensive health study of the impacts of

this incident, to be administered by the LA County Department of Public Health (LAC-DPH). South Coast AQMD staff are working closely with LAC-DPH staff to ensure that efforts are complementary. Because data integration and exposure modeling is the necessary first step for any health study effort of this type, the \$1 million allocated through South Coast AQMD's settlement agreement is proposed to be used toward developing a more thorough and robust exposure model that would serve as the foundation for the LAC-DPH health study, or any other health study of this incident. For latest information on the health effects study, please visit South Coast AQMD's Aliso Canyon Update page at <http://www.aqmd.gov/home/news-events/community-investigations/aliso-canyon-update>.

Group 5 Comments

Residents complained about continued methane gas odors from the facility.

South Coast AQMD's Response:

South Coast AQMD responded to over 2,340 odor complaints received during the gas leak (<http://www.aqmd.gov/home/news-events/community-investigations/aliso-canyon-update/compliance-enforcement-actions-new/odor-complaints>) and took enforcement actions against SoCalGas in 2015 (<http://www.aqmd.gov/home/news-events/community-investigations/aliso-canyon-update/compliance-enforcement-actions-new/notice-of-violation>). South Coast AQMD's enforcement staff continues to respond to all odor complaints and have responded to over 50 complaints this year. Additionally, the South Coast AQMD's enforcement staff periodically conducts unannounced inspections of the facility to ensure compliance with air quality rules and regulations.

Furthermore, beginning in March 2019, South Coast AQMD inspectors have started enforcing CARB GHG regulation for natural gas storage facilities, including the Aliso Canyon facility, with emphasis on the facility's leak detection and repair program. This CARB regulation requires on site monitoring, leak inspection and repair to minimize any potential odor complaints. The implementation of these new regulations can be expected to help alleviate future odors from the operation of gas wells at all gas storage facilities, including Aliso Canyon.

Group 6 Comments

Residents were concerned about exposure to methane gas and benzene during the gas leak and illnesses experienced during blow out, and believe the gas leak should be South Coast AQMD's responsibility.

South Coast AQMD's Response:

Preliminary evaluation for potential health impacts were published by South Coast AQMD on its website on April 26, 2016 at <http://www.aqmd.gov/home/news-events/community-investigations/aliso-canyon-update/health-impacts-estimates>. This preliminary analysis of the potential health risks due to benzene and other air toxics found that any increase in overall health risks from either short-term or long-term exposure to air toxic pollutants is likely to be relatively small. While additional exposures to air toxics can have effects on health, most measurements in the community showed benzene levels were similar to typical outdoor air in Southern California. Some higher short-term benzene levels were measured in the Porter Ranch community following the gas leak, although none exceeded the Acute Reference Exposure Level, meaning that acute health effects are not expected to result from exposure to these levels. While this analysis was based on information available at the time, additional efforts to conduct the health study described under Group 4 comments will result in additional information regarding health impacts.

The state Office of Environmental Health Hazard Assessment (OEHHA) has also conducted health analysis from the monitoring data collected by others, including SoCal Gas. Their analysis is available at http://www.oehha.ca.gov/public_info/emergency/alisocanyon.html. The OEHHA analysis concludes that "Overall, the available air sampling data does not indicate that an acute health hazard exists from any of the volatile organic chemicals measured, including benzene, in the Porter Ranch neighborhood as a result of the Aliso Canyon natural gas leak." The analysis also concluded that "measured exposures to benzene are below the level of concern for chronic health effects" and "Any increase in cancer risk to people in the area due to benzene emissions from the natural gas leak is likely very small." According to OEHHA, "Nearly all measured benzene concentrations in the Porter Ranch community during the leak are similar to background levels generally found in the Los Angeles area, including the nearest long-term monitoring station in Burbank."

Group 7 Comments

SoCal Gas has been negligent in maintaining the gas wells and there is still a risk for another gas leak. South Coast AQMD should not renew the Title V permit (or issue a temporary permit).

South Coast AQMD's Response:

The SoCalGas' proposed Title V Permit renewal only covers equipment that require permits from South Coast AQMD. The gas wells and associated equipment are not permitted by South Coast AQMD and therefore not part of the proposed Title V permit renewal. The proposed Title V permit renewal does not include any new equipment or permits; rather, this proposed permitting action merely updates and renews the permit that has been in place since 2013.

SoCalGas submitted timely Title V permit renewal applications and South Coast AQMD's staff's engineering evaluation shows that the facility is in compliance, and is expected to continue to be in compliance, with all applicable local, state and federal air quality rules and regulations for the equipment covered by the proposed Title V permit renewal. Therefore, South Coast AQMD is not in a position to deny the renewal of the Title V operating permit for the Aliso Canyon facility. It is important to note that the South Coast AQMD does not have any authority to issue a temporary Title V permit under the federal regulations governing the Title V permits.

Next Steps

The South Coast AQMD has carefully considered all comments received at the public information meeting and submitted otherwise. The comments received have not identify any deficiencies in the proposed Title V permit, nor have they demonstrated how the continued operation of the Aliso Canyon facility could result in the violation of the permit. As shown in responses above, the data supports the South Coast AQMD staff's conclusion that the facility can operate in compliance with the proposed Title V permit. As a result, the South Coast AQMD will recommend to the EPA that the proposed Title V permit for SoCalGas' Aliso Canyon facility be renewed after the conclusion of their second review period.

The South Coast AQMD will submit to EPA all comments received pertaining to the SoCalGas Aliso Canyon proposed Title V permit renewal, as well as South Coast AQMD's responses to these comments, as part of their 45-day review. Upon completion of EPA's review, and if no objections are raised by EPA, the South Coast AQMD will issue the final Title V permit renewal for SoCalGas Aliso Canyon facility. The public has the right to petition the EPA to object to the proposed Title V permit within 60 days of expiration of EPA's review period if EPA has not provided an objection during its review period.