CERP IMPLEMENTATION

UPDATE – 2ND QUARTER 2020

Wilmington, Carson, West Long Beach
May 13, 2020
AGENDA

- CERP and CAMP Implementation Timeline
- California Air Resources Board (CARB) Update
- Opening Remarks
- Community Emissions Reduction Plan (CERP) Updates
  - School Prioritization Results
  - Monitoring Updates
  - Oil Drilling and Production Input
- Agenda Items for Next Meeting
- CSC Member Updates
- Public Comment
CERP AND CAMP DEVELOPMENT AND IMPLEMENTATION

- Truck Idling Prioritization
- Monitoring Updates
- Incentives Updates
- Email updates
- CARB Board Meeting (postponed)
- COVID-19 Stay at Home orders
- School Prioritization Results
- Monitoring Updates
- Oil Drilling and Production Input

- Draft CAMP submitted to CARB
- South Coast AQMD Board adopted CERP
- Refinery Updates
- School Prioritization
- Ports Updates
- WNC Meeting
- Submitted CAP Incentive Fund request
Wilmington, Carson, West Long Beach
Community Emissions Reduction Program

May 13, 2020
CARB’s Commitment and Guidance

- Letter from CARB sent to SCAQMD and CSC Members
- Discusses CARB’s desire and intent to hold an in-person Board hearing within or very near to the community
- Recognizes all the work accomplished to-date and that SCAQMD and CSC have already begun Program implementation
- Reiterates CARB staff’s recommendations detailed in the staff report
CARB Meeting

• In the near-term, CARB staff intends to organize a meeting with CSC members
• Ideas for an effective meeting?
  • Topics
  • Format
• To discuss any ideas you have, please reach out to Terry Allen at Terry.Allen@arb.ca.gov
OPENING REMARKS

- CARB consideration of CERP approval
  - CARB Board meeting postponed (date TBD)

- CERP Implementation Timeline Adjustments due to COVID-19
  - Air Monitoring
  - Enforcement
  - Outreach
  - Rulemaking
CSC involvement and input is critical

Thank you for your continued commitment during this time!

Partnerships are key for a successful CERP implementation
LOOKING AHEAD…

- Continue implementing the CERP adopted by South Coast AQMD Board (September 2019)
- Virtual Quarterly CSC Meetings (until further notice)
  - CSC input to guide CERP implementation efforts
  - E-Newsletter Announcements
    - Provides CERP implementation updates to the CSC between quarterly meetings
- Track and record CERP and CAMP progress in annual reports (September 2020)
2020 CSC QUARTERLY UPDATE SCHEDULE

CSC Meeting:
- Refineries
- Ports
- School

January
- School Prioritization Results
- Monitoring Updates
- Oil Drilling and Production

May
- Newsletter Updates

July
- Newsletter Updates
- Annual Reports

August
- CSC Meeting:
  - Railyards*
  - Ports*
  - Refineries*
  - Truck Traffic*

October
- CSC Meeting:
  - Schools*
  - Oil Drilling and Production*
  - Railyards*

November

*Meeting topics subject to change based on CSC input
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PRIORITIZATION ACTIVITY FOR SCHOOL
AIR FILTRATION SYSTEMS – RESULTS

NICOLE SILVA
PROGRAM SUPERVISOR
At the January CSC meeting, staff gathered input from the CSC on criteria and its order of importance.

Based on CSC input staff assembled a list that:
- Prioritizes schools, and
- Estimates the cost to fund air filtration systems for schools

Staff has requested AB 617 funds to support school filtration systems.

Staff will continue work with the CSC to:
- Identify additional funding sources
- Provide outreach to schools
Criteria for Prioritizing Schools

1. School Characteristics (e.g., grade level, student population)

   The CSC prioritized schools based on:
   1. Grade level (i.e., Preschools, followed by elementary, middle, and high schools)
   2. Student population
   3. Percent of students enrolled in free or reduced-price meal program

2. Schools Near Sources of Air Pollution (e.g., freeways, refineries)

3. Multiple Air Toxics Exposure Study (MATES) IV

4. Traffic Data (for nearby freeways and highways)

5. CalEnviroScreen3.0 (i.e., pollution burden and population data)
**Schools Prioritized**

These 10 schools have been prioritized for air filtration system installation

<table>
<thead>
<tr>
<th>School Name</th>
<th>Type of School</th>
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<tbody>
<tr>
<td>Chavez Elementary &amp; Head Start Preschool</td>
<td>Elementary and Early Education Center</td>
</tr>
<tr>
<td>Spectrum Center Schools- Long Beach Jordan Plus High School &amp; Head Start Preschool</td>
<td>High School and Early Education Center</td>
</tr>
<tr>
<td>St. Anthony Elementary &amp; Preschool</td>
<td>Elementary and Early Education Center</td>
</tr>
<tr>
<td>Childtime Children's Center-Infant Program</td>
<td>Early Education Center</td>
</tr>
<tr>
<td>Stephen M. White Middle School</td>
<td>Middle School</td>
</tr>
<tr>
<td>YMCA Of Metropolitan of L.A. Gardena/Carson</td>
<td>Early Education Center</td>
</tr>
<tr>
<td>Edison Elementary &amp; Head Start Preschool</td>
<td>Elementary and Early Education Center</td>
</tr>
<tr>
<td>Hudson K-8 &amp; Head Start Preschool</td>
<td>Elementary and Early Education Center</td>
</tr>
<tr>
<td>Andrew Carnegie Middle School</td>
<td>Middle School</td>
</tr>
<tr>
<td>Rancho Dominguez Preparatory</td>
<td>Middle and High School</td>
</tr>
</tbody>
</table>

The entire prioritized list is available online at: [www.aqmd.gov/ab617/wcwlb](http://www.aqmd.gov/ab617/wcwlb)

*Installation at schools further down the list will be dependent on the availability of additional funding*
April 2020, staff requested CARB allocate ~ $2.4 million in CAP funds for school air filtration system projects in Wilmington, Carson, West Long Beach.

Staff will focus on schools in order of priority established by the CSC.

Next steps require:

- Allocation of CAP funds by CARB, and
- Staff to work with schools to initiate the installation of air filtration systems.
ONGOING AB 617 AIR MONITORING ACTIVITIES

Fixed Monitoring
- Hudson Monitoring Station
- Near-Road (I-710) Monitoring Station

Mobile Monitoring
- Wide-Area and Targeted Surveys
- Leak Detection

Refinery Monitoring
- Baseline VOC monitoring
- Fenceline Air Monitoring at Refineries*
- Community Air Monitoring Stations Near Refineries*

*Conducted as part of South Coast AQMD Rule 1180
Air monitoring updates for the period of June 2019 to March 2020 is now available online:

http://www.aqmd.gov/ab-617/CAMP/infographics/WCWLB
AIR QUALITY PRIORITY: OIL DRILLING AND PRODUCTION

DR. PAYAM PAKBIN AND NICOLE SILVA
PROGRAM SUPERVISORS
## CERP COMMITMENTS

<table>
<thead>
<tr>
<th>Chapter 5e, Action 1</th>
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- Use data from Geologic Energy Management Division to identify active, idle, and abandoned wells
- Work with CSC to prioritize locations for air measurements
- Begin mobile air measurements and make air measurement data available online; conduct follow-up inspections
OIL WELL AIR MONITORING ACTIVITIES

Summary of air monitoring and enforcement activities presented to the CSC in October meeting

Area Surveys

• Area wide mobile monitoring was performed
• Pollution hotspots were identified

Source Identification

• Investigative monitoring led to identification of emission sources

Enforcement

• Leaks were confirmed with FLIR cameras
• Leaks were fixed by facilities and verified by staff

AQ Priority: Oil Drilling and Production
CRITERIA FOR PRIORITIZING AREAS FOR AIR MONITORING

- Characteristics of the well (Active, idle, new, plugged)
- Proximity to sensitive receptors (Schools, daycares, hospitals)
- Oil wells in residential areas
- Working with community members for area surveys using low-cost sensors

AQ Priority: Oil Drilling and Production
Considering active, idle and new wells

Higher priority to residential areas

Wells categorized based on proximity to sensitive receptors

AQ Priority: Oil Drilling and Production
DISCUSSION

- What other factors should be considered in selection of areas for air monitoring?
- What types of oil wells should be prioritized for air monitoring?
- Comments, Questions, Concerns?

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## CERP COMMITMENTS

- **Chapter 5e, Action 2**
  - Work with all stakeholders to identify improvements for Rule 1148.2 notifications (i.e., add mapping location)
  - Work with local public health departments to develop outreach material and messaging for notifications

- **Chapter 5e, Action 3**
  - Evaluate potential for amending Rule 1148 series and Rule 1173 (i.e., annual reporting)
What should staff consider during evaluation of existing South Coast AQMD rules that address oil and gas production?

What improvements to 1148.2 notifications would you like?

What oil and gas activity (e.g., drilling, well rework) are you most concerned about?

What additional reporting would you like to see?
EXAMPLES OF OIL AND GAS EMISSIONS SOURCES

- Wellheads
- Well Cellar
- Separator
- Workover Rig
- Storage Tanks

AQ Priority: Oil Drilling and Production
# Overview of Rule 1148 – Thermally Enhanced Oil Recovery Wells

## Purpose
- To establish Volatile Organic Compound (VOC) limits for the operation of steam drive wells

## Core Requirements
- VOC emission limits for wells with and without vapor control systems
- Annual compliance testing of vapor control systems

## Exemptions
- Well servicing or maintenance
- Wells that meet other criteria (e.g., wells that operate other approved gas gathering systems)

## Enforcement Approach
- Inspect records for daily emissions checks
- Verify records for annual compliance testing of vapor control systems
OVERVIEW OF RULE 1148.1 – OIL AND GAS PRODUCTION WELLS

Purpose

▪ To reduce emissions (VOCs, TACs and TOCs) from the operation and maintenance of wellheads, well cellars, and handling of produced gas
▪ To reduce ozone levels and prevent exposure

Core Requirements

▪ Operational and maintenance standards (e.g., operators are required to contain organic liquids that could spill into well cellars or onto the ground when valves are opened)
▪ Best practices to mitigate odors
▪ Specific cause analyses required for confirmed odor or oil deposition events at facilities within 1,500 feet of a sensitive receptor
▪ Implementation of an approved odor mitigation plan for facilities with continuing odor issues
OVERVIEW OF RULE 1148.1 – OIL AND GAS PRODUCTION WELLS (CONTINUED)

Exemptions

▪ Exemptions from certain rule provisions for:
  ☐ Maintenance and repair of wells, gas handling systems, or portable enclosed storage vessels and associated air pollution control equipment
  ☐ Well drilling or abandonment operations

▪ Exemptions from rule for:
  ☐ Idle and out of operation (more than six months) wells
  ☐ Wells certified to be abandoned by CalGEM
  ☐ Low production wells (e.g., less than one barrel per day) that are 100 meters or more from sensitive receptors
  ☐ Well cellars used for emergencies

Enforcement Approach

▪ Verify registration of wellheads
▪ Inspectors review recordkeeping and maintenance logs
▪ Verify that monitoring is conducted and compliant with rules and regulations
▪ Conduct inspections of oil and gas sites for leaks and rule compliance
OVERVIEW OF RULE 1148.2 – NOTIFICATION & REPORTING REQUIREMENTS FOR OIL & GAS WELLS & CHEMICAL SUPPLIERS

Purpose
- To gather air quality-related information on well activities

Core Requirements
- Requires onshore oil or gas well operators to notify South Coast AQMD at least 48 hours before the start of well drilling, completion, or rework activities
- Requires operators to provide well information, if trade secret is not claimed, including:
  - Contact information of owner and operator
  - Location (geographic coordinates)
  - Projected date and time, and type of activity to be conducted (e.g., drilling, well completion, and reworking)
- Additional notification requirements for modified activity dates
- Information posted to South Coast AQMD website (http://www.aqmd.gov/home/rules-compliance/compliance/1148-2)

Enforcement Approach
- Inspectors verify facility submitted proper reports and notifications
- Inspectors check timeliness notification submittals
- Conduct complaint investigations to verify sources of odors and require mitigations plans, if applicable
OVERVIEW OF RULE 1173 – CONTROL OF VOC LEAKS & RELEASES FROM COMPONENTS AT PETROLEUM FACILITIES & CHEMICAL PLANTS

Purpose
- Control volatile organic compound (VOC) leaks from components and releases pressure relief devices (PRDs)

Core Requirements
- Sets operator inspection and maintenance requirements, leak standards, recordkeeping and reporting requirements

Exemptions
- Components that meet other criteria (e.g., components that present a safety hazard and that are being repaired and replaced)
- Atmospheric PRD releases due to natural disasters, etc.

Enforcement Approach
- Use FLIR camera and Toxic Vapor Analyzer (TVA) to identify leaks/sources of odors (active and abandoned oil fields)
- Inspectors review recordkeeping and maintenance logs, verify quarterly leak inspections
DISCUSSION

- What should staff consider during evaluation of existing South Coast AQMD rules that address oil and gas production?

- Comments, Questions, Concerns?

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AQ Priority: Oil Drilling and Production
**ONGOING EFFORTS**

- South Coast AQMD staff to initiate evaluation of potential amendments to:
  - Rules 1148.1, 1148.2, 1173, 1178
- City of Los Angeles July 2019 Oil and Gas Health Report
  - City Council requested analysis of recommendations provided in report
  - Potential ordinance may be created depending on analysis
- CalGEM (previously DOGGR)
  - Pre-rulemaking stage to update public health and safety protections for communities near oil and gas production operations
  - In-person April community meeting postponed; comment period extended to June 10, 2020; three telephone town halls scheduled
  - Working with South Coast AQMD to evaluate opportunities to address public input
NEXT STEPS

Future Announcements
- Newsletters
- Continue CERP implementation

Future Meeting
- Tentatively August 2020 (virtual)
- AQ Priority Updates & Agenda Topics
  - What would you like to hear about? (i.e., ISR updates)
- Other topics?
CSC Member Update
Public Comment