



# South Coast Air Quality Management District

# **FREQUENTLY ASKED QUESTIONS**

## **SoCal Gas Aliso Canyon Facility Proposed Title V Permit Renewal**

### **Q. What is a Title V permit?**

Major sources of air emissions are required to obtain a federal operating permit, known as a Title V permit. Such operating permits are locally issued by South Coast AQMD. A Title V permit creates a single, facility-wide permit that covers equipment associated with operations at a facility and are under the permitting authority of the South Coast AQMD. In addition, the permit includes all applicable local, state, and federal air quality requirements as well as monitoring, recordkeeping and reporting requirements. New Title V permits, permit renewals and significant permit revisions are required to be made available to the public for review and comment. Once South Coast AQMD completes its review, the application and the proposed permit are submitted to the U.S. Environmental Protection Agency (EPA) for review before they are issued. Additional information on South Coast AQMD's Title V permit program can be found at: <http://www.aqmd.gov/home/permits/title-v>

### **Q. What is the Title V Permit renewal process?**

Most Title V permits are renewed every five years if the applicant applies for the permit renewal prior to the expiration of the five year term; the permit is updated with the latest applicable regulatory requirements; and the facility is in compliance with all applicable rules and regulations. An application for a Title V permit renewal requires the same review process as a new Title V permit. During the renewal process, South Coast AQMD reviews the permit application to ensure that the facility has been operating in compliance with its permit conditions and will update the permit, as necessary, by incorporating new conditions for any new regulatory requirements. The permit application is then opened for public comment. Once the public comment period is closed, South Coast AQMD reviews and responds to all comments received and makes any required changes to the permit. All public comments and responses will be included in the permit package submitted to EPA for review.

A facility may continue to operate beyond the expiration of its Title V permit as long as their application for renewal was submitted to South Coast AQMD on time, and is operating within the conditions of its expired permit.

### **Q. When will the Title V permit for the SoCalGas Aliso Canyon Facility be issued?**

The comment period for the Title V renewal application for the SoCalGas Aliso Canyon facility ended on November 8, 2018. South Coast AQMD is in the process of responding to all comments received. While the formal public comment period has ended, South Coast AQMD will consider any additional comments received at the May 29, 2019 Public Information Meeting. All written responses to the comments received will be made available on our website (<http://www.aqmd.gov/home/news-events/community-investigations/aliso-canyon-update/permitting-activities>).

Once South Coast AQMD reviews and responds to public comments, it will reevaluate the Title V renewal application. If the agency determines that the facility is in compliance with the applicable rules and regulations and permit conditions, the proposed Title V permit will then be submitted to EPA for its 45-day final review. If EPA does not object, then the proposed Title V permit will be renewed.

### **Q. Will the public be able to further comment on the Title V permit before it is issued and will that affect your decision to issue the permit?**

Although the formal public comment period has ended, South Coast AQMD will consider all comments received at the May 29, 2019 Public Information Meeting.

## FREQUENTLY ASKED QUESTIONS

### Q. What does the Title V permit cover and what would a violation entail?

The Title V permit covers only the stationary sources of air pollution at a facility. Equipment permitted by South Coast AQMD at the Aliso Canyon facility include non-emergency engines for backup power, storage tanks, gas odorization system, dehydration plant, water treatment, flares, boilers, bulk loading, and gasoline storage and dispensing. The Title V permit also contains specific conditions for the operation of the equipment listed in the permit to ensure compliance with all local, state and federal air quality requirements. Failure to operate the equipment in accordance with the permit requirements can result in a violation.

Please note that the structural integrity and operation of the wells are under the Division of Oil, Gas, and Geothermal Resources' (DOGGRs) regulatory authority. Although the wells are not permitted by the South Coast AQMD, the California Air Resources Board (CARB) has delegated authority to the agency to enforce some of its regulations for crude oil and gas production and storage facilities, including the Leak Detection and Repair program. Any non-compliance with regulations that CARB has given the agency authority to enforce could also result in a violation.

### Q. Is there any scenario where the Title V permit would not be re-issued?

The facility is required to be in compliance with all regulations and conditions included in the Title V permit. A Title V permit cannot be re-issued if there is any ongoing violation, unless the facility can demonstrate that it is on a path to compliance. Any violation of a Title V permit can lead to an enforcement action, termination, and/or denial of a permit renewal application.

### Q. When was the last time you inspected the facility?

The facility was last inspected on May 23, 2019.

### Q. Is South Coast AQMD continuing to monitor emissions from the facility? If so, what are you monitoring for? Whose data are you using?

South Coast AQMD does not currently have any ambient air monitors at the SoCalGas Aliso Canyon facility. However, South Coast AQMD and CARB did conduct extensive air monitoring in the Aliso Canyon neighborhood following the gas leak in 2015, and South Coast AQMD continued its monitoring efforts through August of 2017. For further information on monitoring conducted by South Coast AQMD, please visit

<http://www.aqmd.gov/home/news-events/community-investigations/aliso-canyon-update>.

Under CARB's new regulation for oil and gas production and storage facilities, SoCalGas must install additional monitors at their Aliso Canyon facility. South Coast AQMD, under a signed Memorandum of Agreement with CARB, now has been delegated the authority to enforce this regulation and conduct routine inspections to ensure the facility is in compliance CARB's new regulation requirements.

### Q. What is the status of South Coast AQMD's health study?

A Request for Proposal (RFP) to conduct the health study was issued on November 2, 2018. Only one application was received despite extensions to the deadline and additional outreach. South Coast AQMD is in the process of putting together a review panel to evaluate the application.

### Q. What are the different agencies involved at Aliso Canyon and what role do they play?

#### **Division of Oil, Gas, and Geothermal Resources (DOGGR)**

DOGGR provides oversight of the oil, natural gas, and geothermal industries and regulates the drilling, operation, and permanent closure of energy resource wells, including those at Aliso Canyon.

#### **California Public Utilities Commission (CPUC)**

CPUC regulates privately owned public utilities in California, including electric power, telecommunications, natural gas and water companies; regulates utilities' natural gas rates and natural gas services, including in-state transportation and distribution pipeline systems, storage, procurement, metering and billing.

Other Agencies involved include **CARB, EPA, the California Occupational Health and Safety Administration, and Los Angeles County Department of Public Health.**