

CERP IMPLEMENTATION

UPDATE – 2ND QUARTER 2020

Wilmington, Carson, West Long Beach
May 13, 2020

ASSEMBLY BILL (AB) 617
COMMUNITY AIR INITIATIVES

COMMUNITY EMISSIONS REDUCTION PLAN

WILMINGTON, CARSON,
WEST LONG BEACH

SEPTEMBER 2019
FINAL



SOUTH COAST
AIR QUALITY MANAGEMENT DISTRICT

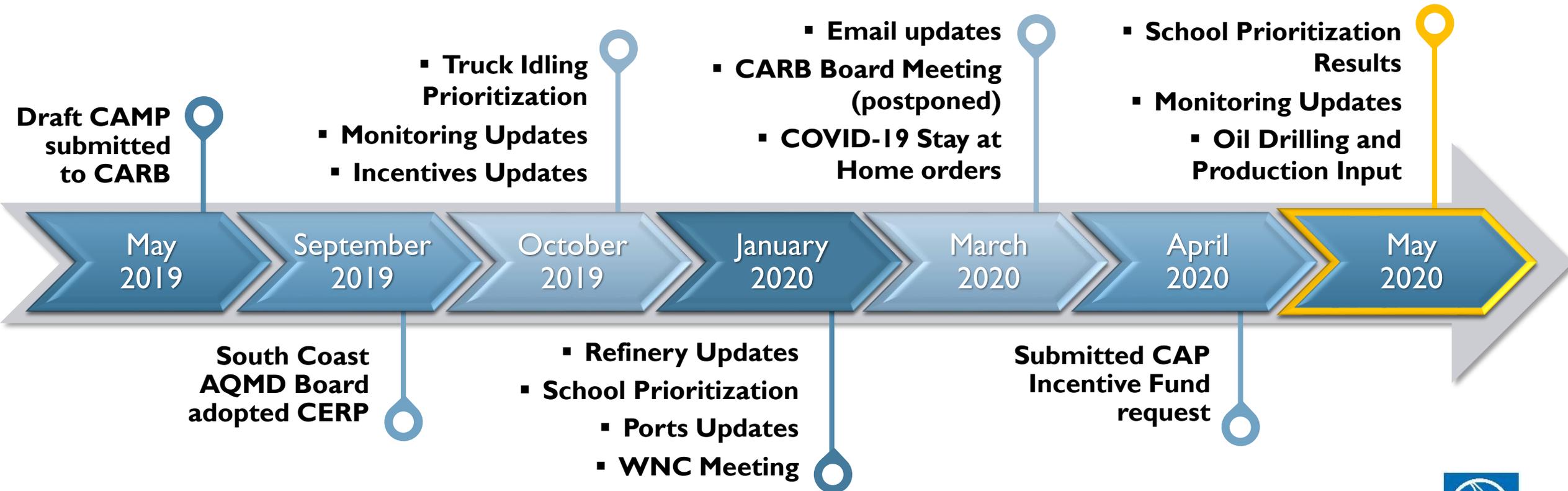


AGENDA



- 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





Wilmington, Carson, West Long Beach Community Emissions Reduction Program

May 13, 2020

CARB's Commitment and Guidance



Gavin Newsom, Governor
Jared Blumenfeld, CalEPA Secretary
Mary D. Nichols, Chair

April 24, 2020

Wayne Nastri, Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

34 Community Steering Committee Members

Dear Mr. Nastri and Community Steering Committee Members,

As you are aware, the California Air Resources Board (CARB or Board) has postponed consideration of the community emissions reduction program (Program) for the Wilmington, Carson, West Long Beach community, previously scheduled for March 16, 2020. The postponement is in recognition that community participation is a critical aspect of the Board hearing and that we are not able to hold meetings in person at this time. CARB will schedule a future meeting on an appropriate date that will allow for full, in-person community participation. This letter is intended to provide the South Coast Air Quality Management District (District) and the Community Steering Committee with recommended guidance on how to proceed in the interim, until the Board has an opportunity to hold such a meeting to consider the Program for this community. But, I first want to recognize the District, its staff, and the Steering Committee on developing the community emission reduction program. It is a key milestone reflecting the ongoing work with the community to develop and implement effective strategies to reduce emissions and exposure to air pollutants in our most impacted communities.

CARB applauds the District and the Community Steering Committee as they have already begun implementing the Program. Our goal is to ensure that we support your collective efforts to reduce air pollution and improve public health within this heavily impacted community. As such, we encourage the District and the Community Steering Committee to continue its implementation of the Program with consideration of the Recommended Actions to Strengthen Implementation included in CARB's Wilmington, Carson, West Long Beach Community Emissions Reduction Program Staff Report, released on February 24, 2020¹. These recommendations reflect community

¹ Staff Report located at: https://ww2.arb.ca.gov/capp_2018_ad_cerps.

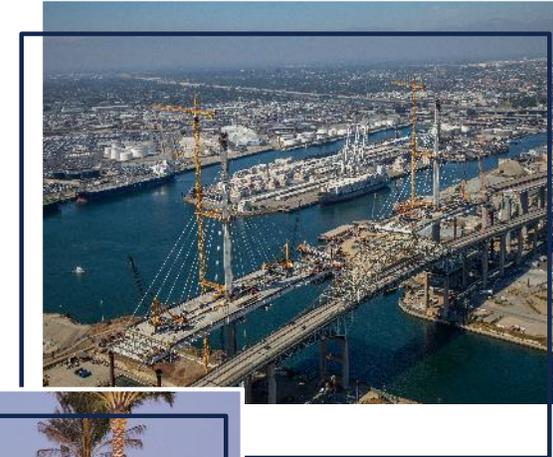
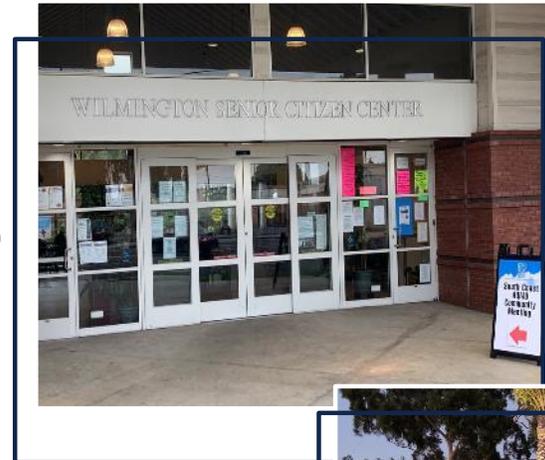
- Letter from CARB sent to SCAQMD and CSC Members
- Discusses CARB's desire and intent to hold an in-person Board hearing within or very near to the community
- Recognizes all the work accomplished to-date and that SCAQMD and CSC have already begun Program implementation
- Reiterates CARB staff's recommendations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



CERP IMPLEMENTATION - UPDATES

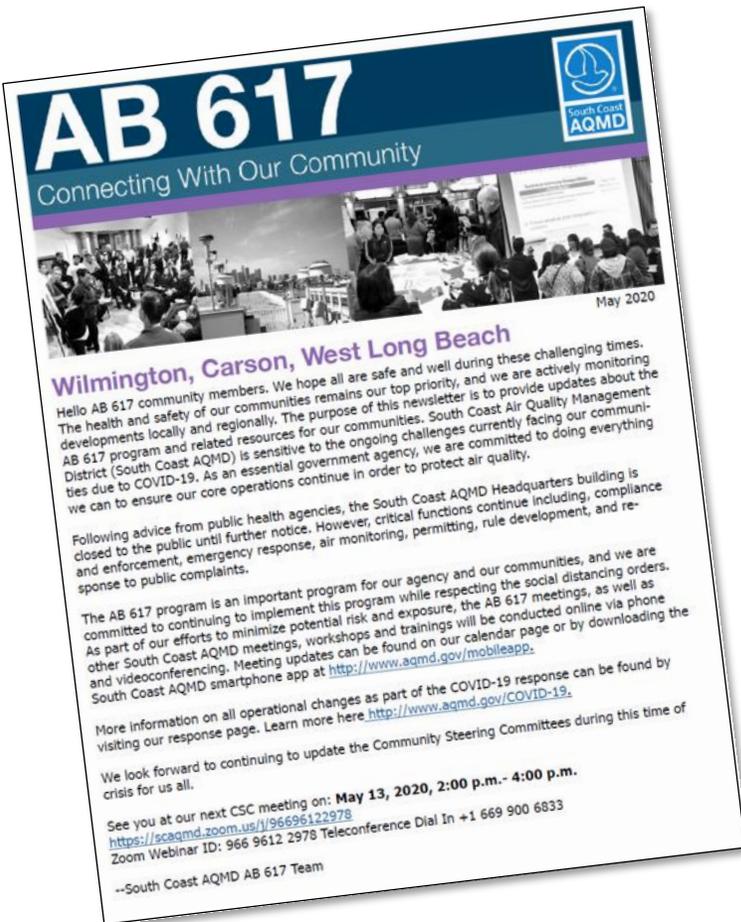
Partnerships are key for a successful CERP implementation

CSC involvement and input is critical

Thank you for your continued commitment during this time!



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

Newsletter Updates

- Newsletter Updates
- Annual Reports

January

May

July

August

October

November

CSC Meeting:

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

CSC Meeting:

- Railyards*
- Ports*
- Refineries*
- Truck Traffic*

CSC Meeting:

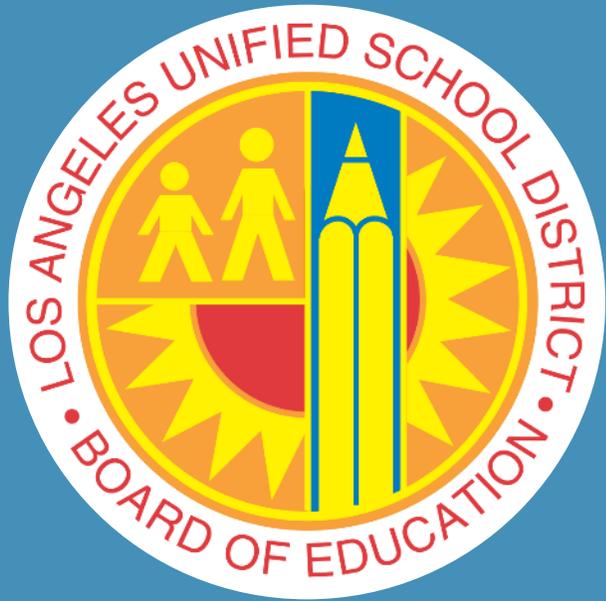
- Schools*
- Oil Drilling and Production*
- Railyards*

*Meeting topics subject to change based on CSC input

SOUTH COAST AQMD CONTACTS: WCWLB



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PRIORITIZATION ACTIVITY FOR SCHOOL AIR FILTRATION SYSTEMS – RESULTS

NICOLE SILVA

PROGRAM SUPERVISOR

SCHOOL AIR FILTRATION SYSTEMS – SELECTION AND PRIORITIZATION

Criteria for Prioritizing Schools

- At the January CSC meeting, staff gathered input from the CSC on criteria and its order of importance

Schools Prioritized

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

Funding and Outreach Efforts

- 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:

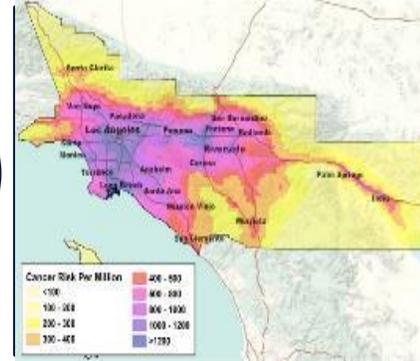
1. Grade level (i.e., Preschools, followed by elementary, middle, and high schools)
2. Student population
3. Percent of students enrolled in free or reduced-price meal program

2



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

3



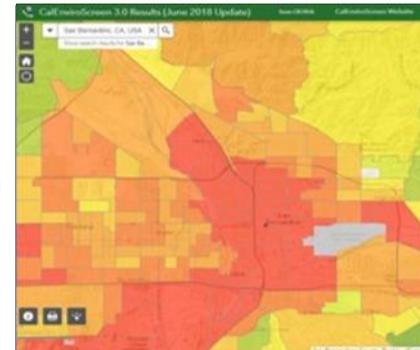
Multiple Air Toxics Exposure Study (MATES) IV

4



Traffic Data (for nearby freeways and highways)

5



CalEnviroScreen 3.0 (i.e., pollution burden and population data)

Schools Prioritized

These 10 schools have been prioritized for air filtration system installation

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

The entire prioritized list is available online at: www.aqmd.gov/ab617/wcwlb

**Installation at schools further down the list will be dependent on the availability of additional funding*

Recent Funding and Outreach Efforts

- 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



Hudson Air Monitoring Station

AIR MONITORING UPDATES

DR. PAYAM PAKBIN

PROGRAM SUPERVISOR

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*

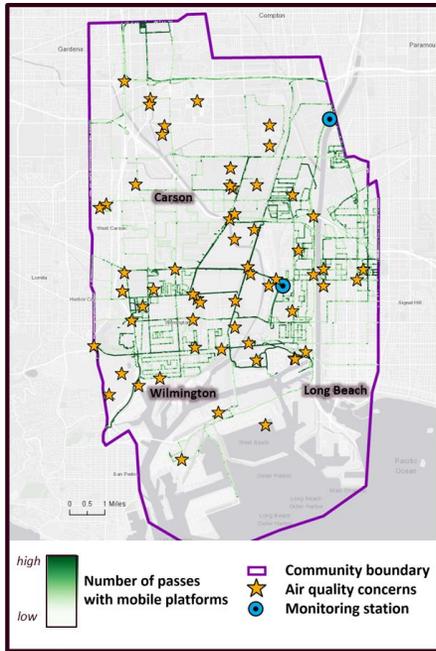
**Conducted as part of South Coast AQMD Rule 1180*



WILMINGTON, CARSON, WEST LONG BEACH AB 617 COMMUNITY AIR MONITORING UPDATES JUNE 2019 TO MARCH 2020

South Coast AQMD staff updates on the implementation of the Wilmington, Carson, West Long Beach Community Air Monitoring Plan (CAMP) are provided below.

- 5/5** of air quality priorities surveyed
- 22** community surveys
- 1063** miles traveled with the mobile platforms



To be Initiated Ongoing Concluded

Refineries

- Mobile monitoring around refineries
- One year of fenceline monitoring at refineries (Rule 1180)
- Establish community sites around refineries (Rule 1180)
- Establish baseline emissions and leak detection based on mobile and fenceline monitoring
- Collaborate with CSC on community air monitoring
- Explore smart leak detection and repair technologies

Neighborhood Truck Traffic

- Mobile monitoring in "truck idling hotspots" identified by the CSC

Oil Drilling & Production

- Use data from Geologic Energy Management Division to identify active, idle, and abandoned wells
- Mobile monitoring around oil wells to detect potential leaks

Railyards

- Mobile monitoring around railyard facilities
- Collaborate with railyards to conduct air monitoring inside facilities

Ports

- Air monitoring to detect vessels and oil tanker leaks

*Last updated April 2020



For more information, please visit AB 617 website: www.aqmd.gov/ab617

CAMP IMPLEMENTATION UPDATES

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

- Chapter 5e, Action 1

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 wide mobile monitoring was performed
- Pollution hotspots were identified

Area Surveys

- Investigative monitoring led to identification of emission sources

Source Identification

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

Enforcement

CRITERIA FOR PRIORITIZING AREAS FOR AIR MONITORING



Characteristics of the well
(Active, idle, new, plugged)



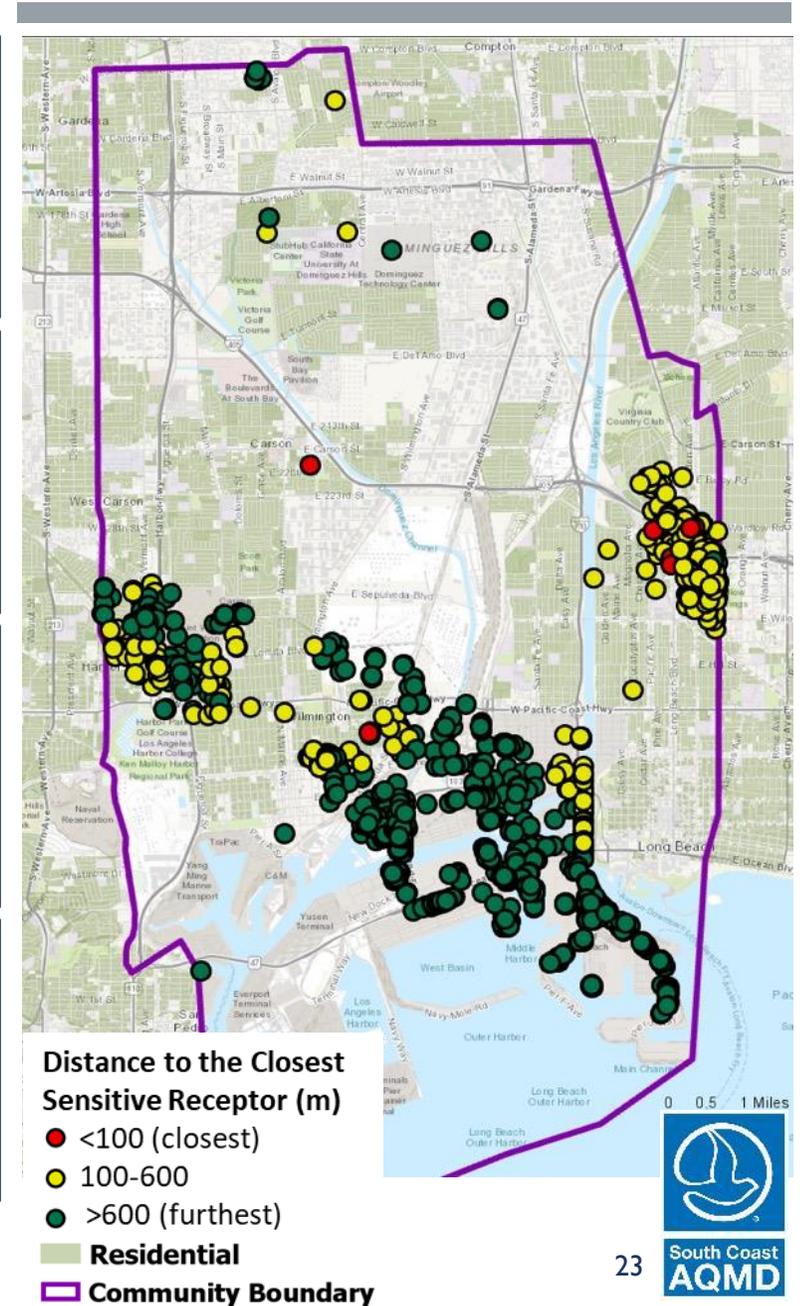
Proximity to sensitive
receptors
(Schools, daycares, hospitals)



Oil wells in residential areas



Working with community
members for area surveys
using low-cost sensors



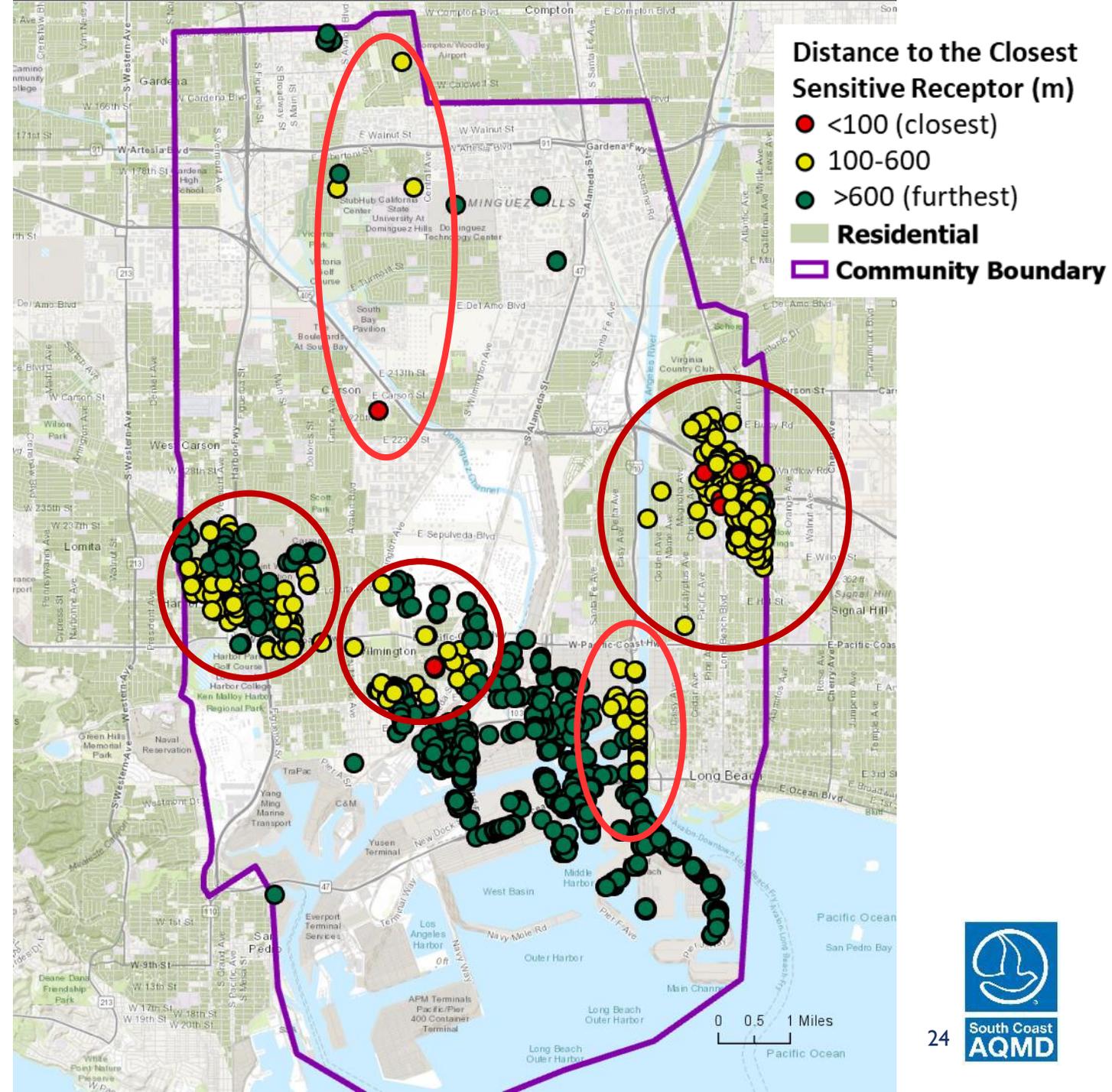
AREA PRIORITIZATION EXAMPLE

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?



Please contact:
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CERP COMMITMENTS

■ Chapter 5e, Action 2

Work with the 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)

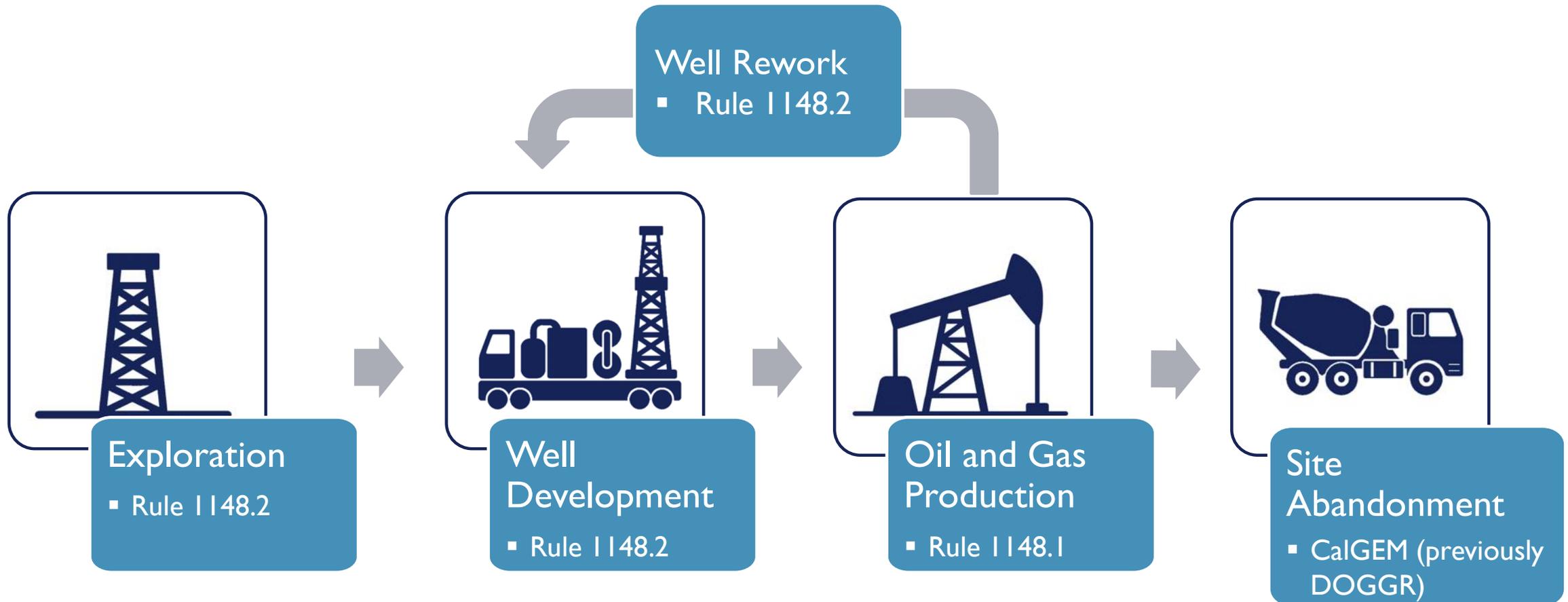


CSC INPUT

- 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?



OVERVIEW OF OIL AND GAS WELL RULES



EXAMPLES OF OIL AND GAS EMISSIONS SOURCES



Wellheads



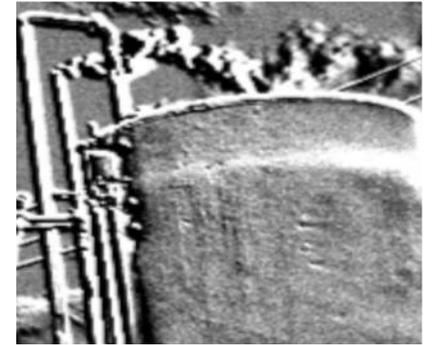
Well Cellar



Separator



Workover Rig



Storage Tanks

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
 - Name and API number (if available)
 - Location (geographic coordinates)
 - Nearest sensitive receptor (within 1,500 feet)
 - 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?

Please contact:
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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