

SOUTH COAST AQMD



PUBLIC INFORMATION MEETING

**Proposed Title V Permit Renewal
for**

Southern California Gas Company

Aliso Canyon Facility

12801 Tampa Ave., Northridge CA

May 29, 2019

California State University, Northridge, CA

Purpose of Public Information Meeting

- Discuss the Proposed Title V Permit Renewal
(no new permit being issued)
- Provide information on the facility, equipment and emissions
- Discuss comments received during public comment period
- Describe the Next Steps



Title V Permitting Program Overview



- Federal operating permitting program administered locally by South Coast AQMD
- Requires major emission sources to obtain a Title V Facility Permit
- Consolidates all applicable local, state, and federal air quality requirements into one document.
- Increases Compliance Accountability by the operator
- Requires US Environmental Protection Agency (US EPA) review of all permit actions (Initials, Renewals and all Revisions)

Title V Permitting Program Overview - Continued



- Requires recordkeeping and additional reporting requirements such as self-reporting of deviations
- Enhances Public Participation for certain Title V permit actions (Initials, Renewals and Significant Revisions)
- Requires permit renewal every 5 years (except for facilities with solid waste incineration units-renewal every 12 years)

SoCalGas Aliso Canyon Facility Overview



- Located at 12801 Tampa Ave. in Northridge
- Opened in 1938 as oil field (Tidewater Associated Oil Company)
- In 1972, after depletion of oil, repurposed the field to gas storage
- 2nd largest storage facility of its kind in the United States
- Capacity to store ~88 billion cf, ~114 injection/withdrawal wells

SoCalGas Aliso Canyon Facility Overview



Facility Title V Permit Overview

Processes and Operations

- Non-Emergency natural gas engines driving electrical generators and compressors
- Storage Tanks (waste water, wash and crude oil/gas/water separation system)
- Gas Odorization System
- Dehydration Plants (including Flares)
- Water Treatment/Clarification
- Natural Gas Boilers
- Gasoline Storage and Dispensing System
- Vapor Recovery System
- Bulk Loading



Key Changes to the Permit since 2013 Renewal

- Removal and Replacement of three 15,200 HP (each) natural gas burning compressors with electrical compressors
 - Reduction of 209 tons/yr of NO_x, 2.7 tons/yr SO_x, 5.2 tons/yr PM (based on 2014 EFB)
- Conversion of four existing emergency engines to non-emergency engines and addition of one new engine to provide backup power to remote sections of the facility
 - All retrofitted with emission controls to meet stringent distributive Generation (DG) standards of Rule 110.2
- Addition of new regulatory requirements



New Regulatory Requirements



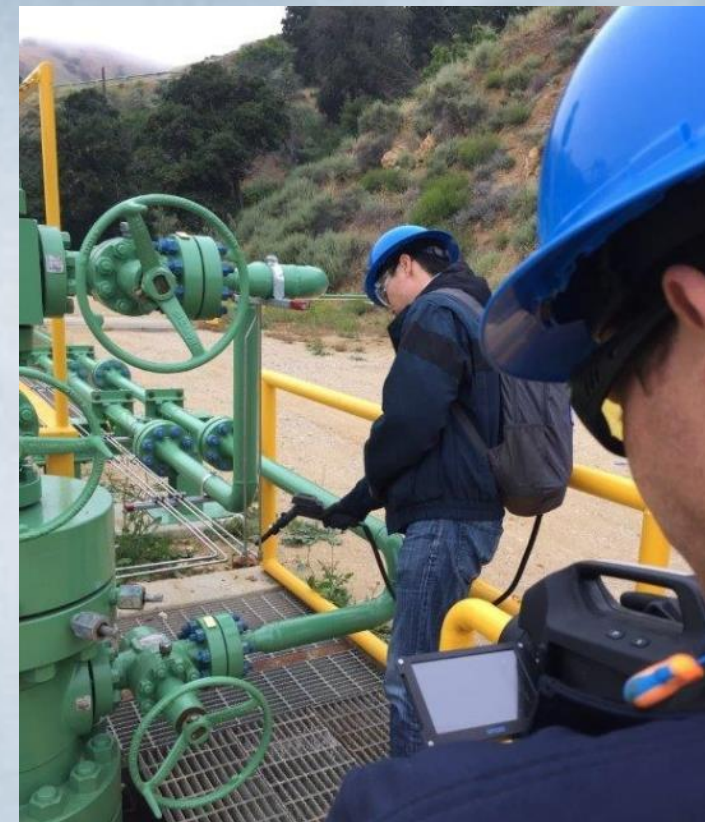
Facility will be subject to following additional new rules upon renewal:

- South Coast AQMD Rule 1110.2 -Emissions from Gaseous - and Liquid-Fueled Engines
- South Coast AQMD Rule 1148.2 -Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers
- US EPA 40CFR Part 98 – Mandatory GHG Reporting
- California Air Resources Board (CARB) Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities

CARB GHG Standards for Crude and Natural Gas Facilities

Key Requirements

- Adopted by CARB in March 2017
- Reduces methane emissions from Natural Gas Underground Storage Facilities through:
 - Leak Detection and Repair (LDAR)
 - ✓ Daily audio/visual inspections and quarterly leak measurements of components
 - ✓ Leak repair requirements specified in regulation
 - Underground gas storage monitoring program
 - ✓ Ambient air monitoring
 - ✓ Daily or continuous leak monitoring at injection/withdrawal wellheads
- Delegation to local air districts for implementation and enforcement



How South Coast AQMD Implements CARB's New GHG Regulation

- South Coast AQMD has signed a Memorandum of Agreement (MOA) with CARB to implement and enforce the new GHG Regulation:
 - ✓ Routine unannounced inspections on permitted/non-permitted equipment with focus on facility's leak detection and repair programs
 - ✓ Utilization of organic vapor analyzers and optical gas imaging cameras
 - ✓ May issue NOVs or other citations for violations of the regulation
- South Coast AQMD inspections began in March, 2019; still ongoing



Summary of Public Comments

Proposed Title V Permit



1. Hold public meeting before the Title V Permit is reissued
2. Keep permit process open and transparent, and allow substantial public involvement
3. Title V Permit should not be re-issued because it is deficient
4. Facility should be shut down
5. Constant odors from the facility
6. Several comments related to the well blowout
 - ✓ Fear of future blowout
 - ✓ Risk of earthquakes
 - ✓ Exposure to Crude Oil
 - ✓ Letter to CPUC
 - ✓ Facility ignored to install safety valves on the wells

Summary of Public Comments - Continued

7. SoCalGas manipulates data from the court-ordered fence line monitoring of methane emissions
8. Comments about how health studies will be conducted
9. Draft permit issuance very close to the TV permit expiration. Concern that comments submitted will not be fully taken into account.

Agency Jurisdictions

South Coast AQMD


- ❖ Regulates emissions from primarily stationary sources of air pollution (large power plants and refineries to the corner gas station)
- ❖ Does not regulate oil or natural gas reservoirs including injection or extraction wells at these facilities
- ❖ Does regulate 49 permitted equipment at Aliso Canyon facility
- ❖ Wells subject to registration (not-permitted) and CARB's new Leak Detection and Repair requirements

Division of Oil, Gas And Geothermal Resources (DOGGR)



- ❖ Oversight of the oil, natural gas, and geothermal industries
- ❖ Regulates the drilling, operation, and permanent closure of energy resource wells
- ❖ Aliso Canyon wells under DOGGR's jurisdiction

California Public Utilities Commission (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

SoCalGas Aliso Canyon Title V Permit Renewal

Next Steps



- Consider all input received and re-evaluate Title V permit renewal. Review and respond to all comments received within 3 to 4 weeks
- If facility is in compliance with all South Coast AQMD rules and regulations, resubmit proposed Title V renewal permit, and all supporting documents to US EPA for their second 45-day review
- Renew Title V permit if US EPA does not object to the proposed permit
- Public may petition US EPA to reconsider its decision within 60 days after the end of US EPA's 45-day review period.

South Coast AQMD Contacts



Aliso Canyon Title V Permit Renewal

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For a copy of the Title V permit and supporting documents:
<http://www.aqmd.gov/home/news-events/community-investigations/aliso-canyon-update>

Public Comments