



South Coast Air Quality Management District

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Via Email and Certified Mail with return receipt

December 6, 2019

Mr. John Thompson
Storage Operations Manager
So Cal Gas Co., Playa del Rey Storage Facility
8141 Gulana Ave.
Playa del Rey, CA 90293-7930

Subject: Conditional Approval of Rule 1402 Risk Reduction Plan (RRP) for
Southern California Gas Company, Playa del Rey Storage Facility
(South Coast AQMD Facility ID No.: **8582**)

Dear Mr. Thompson:

This letter provides conditional approval of the Risk Reduction Plan for Southern California Gas Company, Playa del Rey Storage Facility (So Cal Gas), located at 8141 Gulana Avenue, Playa del Rey (Facility ID No. 8582).

Background

In accordance with AB 2588 and South Coast AQMD Rule 1402, South Coast AQMD staff notified So Cal Gas on March 22, 2018 that it must submit a Health Risk Assessment (HRA) based on its 2015 Air Toxics Inventory Report (ATIR). The HRA prepared for this request was submitted on June 7, 2018. South Coast AQMD staff and the Office of Environmental Health Hazard Assessment reviewed the HRA and approval was granted on January 2, 2019.

The HRA demonstrated that the non-cancer acute health risk levels were mainly due to benzene and formaldehyde emissions from natural gas venting at a blowdown stack. The levels exceeded both the Notification Risk Level and the Action Risk Level of Rule 1402 so a Risk Reduction Plan (RRP) was required. The RRP was submitted to South Coast AQMD on April 26, 2019.

Risk Reduction Plan and Next Steps

The risk reduction measures (RRMs) in your RRP include operational changes started in 2018 by no longer routing natural gas to the blowdown stack during routine maintenance, and rerouting natural gas venting from well group headers to a distribution line controlled by two carbon adsorbers in series.

After careful review of the RRP and the proposed RRM, we have determined that So Cal Gas's RRP is consistent with Rule 1402 requirements to reduce the facility's risk below the Action Risk Level and Notification Risk Level of Rule 1402. Therefore, So Cal Gas's RRP is conditionally approved contingent upon the condition that So Cal Gas submits a complete RECLAIM/Title V application pursuant to Rule 3004 to revise its RECLAIM/Title V permit to include facility-wide conditions incorporating RRM, such as the operational changes of no longer routing natural gas venting to the blowdown stack, which are not directly related to equipment requiring a written permit.

Please be advised, pursuant to South Coast AQMD Rule 1402(k)(1), if information becomes known to the Executive Officer after the last submitted risk reduction plan that would substantially impact risks to exposed persons, implementation, or effectiveness of the plan, the Executive Officer may require the plan to be updated and resubmitted. Such examples include discovery of fugitive emissions emitted outside of traditional ventilation stacks or new equipment or processes.

In addition, pursuant to Rule 1402(j), So Cal Gas is required to submit annual progress reports to demonstrate the progress achieved in implementing the RRM. The first annual progress report is due 12 months from the date of this approval letter, on December 6, 2020. A final implementation report must be submitted once implementation is fully achieved.

If you have any questions, please feel free to contact me at (909) 396-3106 or Victoria Moaveni, Program Supervisor at (909) 396-2455.

Sincerely,



Tracy A. Goss, P.E.
Planning & Rules Manager
Planning, Rule Development & Area Sources

TG:VM:FC:ML