

Shafter Community Compliance & Enforcement

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Enhanced Enforcement Measures in Shafter CERP



Enhanced Enforcement of Wood Burning Curtailments

- 4 hours of proactive fireplace enforcement on each curtailment day (2 hrs. AM and 2 hrs. PM) including weekends and holidays



Enhanced Enforcement to Reduce Illegal Burning of Residential Waste

- 15 hours of surveillance per quarter



Enhanced Enforcement of Statewide Anti-Idling Regulation

- 15 hours of surveillance per quarter



Pilot Training Program for Conducting Self-Inspections at Gas Stations



Enhanced Inspection Frequency of Stationary Sources

- Inspections every 6 months for facilities with emissions-related violations

Oil & Gas Operations

Inspection and Enforcement

Background

- Clean Air Act is a law that, among other things, establishes how areas need to meet National Ambient Air Quality Standards (Standards) for various pollutants
- Emission limits put in place by regulatory programs at various agencies to achieve emission reductions and protect public health
 - **National Level:** Environmental Protection Agency (EPA)
 - **State Level:** California Air Resources Board (CARB) & Geologic Energy Management Division (CalGEM, oversight on oil & gas)
 - **Local Level:** Air Districts



District's Role in Regulating and Inspecting Oil & Gas Operations

- Adopt, implement and enforce local rules and regulations
- Issue permits and registrations for equipment and operations that are subject to the District's rules and regulations
- Conduct routine inspections of oil and gas facilities
 - More frequent inspections occur in Shafter's AB 617 footprint
- Respond to and investigate public complaints
- Participate in taskforce inspections with partner agencies including EPA, CARB and CalGEM

Rules & Regulations that Apply to Oil & Gas Facilities

Rule 4307: Boilers, Steam Generators and Process Heaters

Rule 4401: Steam-Enhanced Crude Oil Production Wells

Rule 4409: Components at Light Crude Oil Production Facilities, Natural Gas Facilities, and Natural Gas Processing Facilities

Rule 4623: Storage of Organic Liquids

Rule 4311: Flares

Rule 4702: Internal Combustion Engines

COGR: California Oil & Gas Regulation

Others: Additional Rules Maybe Applicable

Types of Oil Production Operations

Small Oil Production Operation



Large Oil Production Operation



Tank Battery with Flare and Separation Systems



Types of Oil Production Equipment



Steam Generator Bank



Pump Jack Wells



Well Header System



Sulfur Treat Vessels



Piping and Valves

How does the District Conduct Inspections?

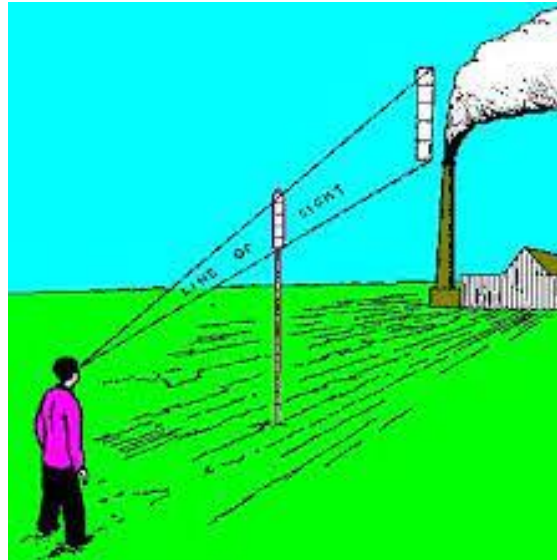


Inspectors use specialized equipment:

- Hydrocarbon Analyzers
- Exhaust Gas Analyzers
- Optical Gas Imagery (OGI) Camera

Other tasks during inspections:

- Visible Emission Evaluations
- Record Review



What are Operators Required to do to Ensure Continuous Compliance Year Round?

- Operator Leak Detection and Repair (LDAR)
- Tank Preventative Inspection and Maintenance
- Emission Monitoring
- Source Testing
- Sampling



How is Enforcement Action Taken?

When the inspector notes something at the facility that is not in compliance with applicable rules, they issue a Notice of Violation (NOV)

Examples of violations that would result in an NOV

- Leaks, Open-Ended Lines
- Excess Emissions and Throughputs
- Un-permitted Equipment
- Late Self-testing/Monitoring
- Failure to Source Test
- Failure to Maintain Records

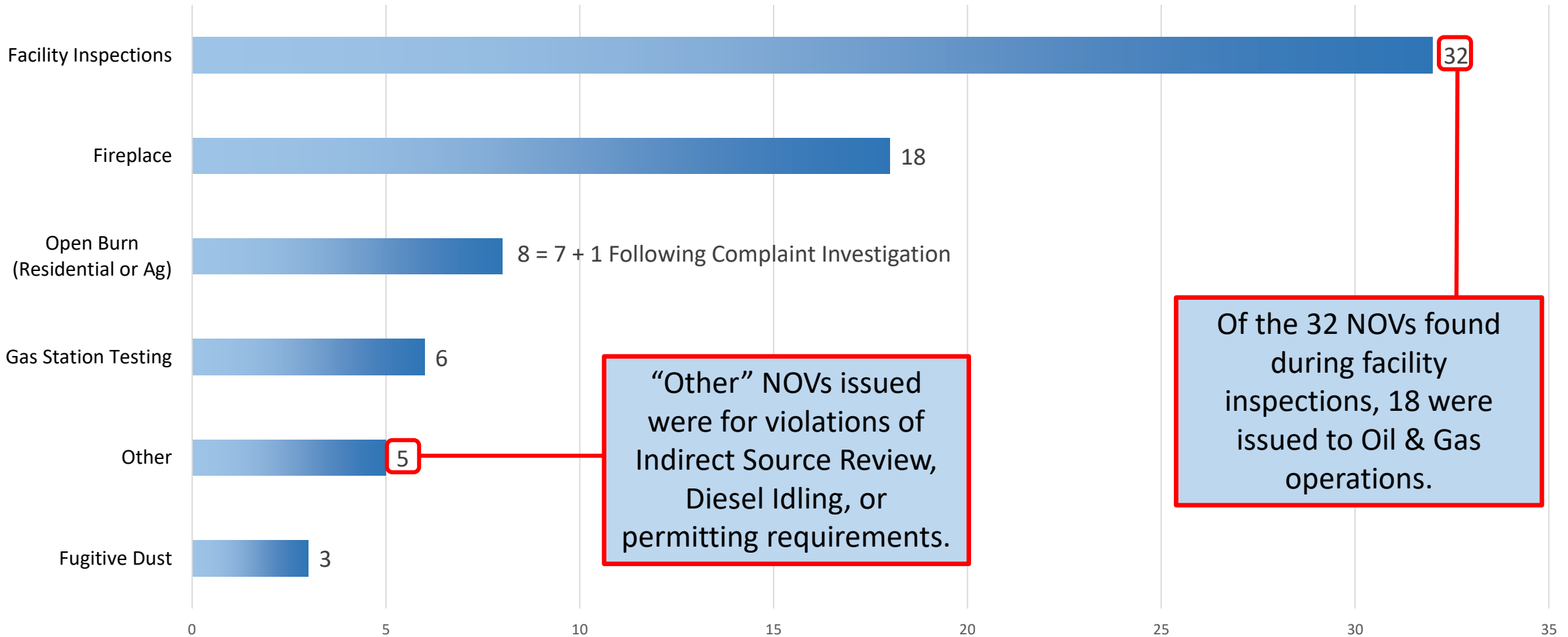


Shafter 2022 Annual Report Summary

- 72 total Notices of Violation (NOVs) issued in Shafter during 2021-22 reporting period
 - **1 NOV resulting from public complaints**
 - Agricultural Open Burning
 - **32 NOVs from enhanced facility inspections**
 - Including 18 NOVs associated with refinery and oil & gas operations
 - **18 NOVs from fireplace enforcement**
 - Use of wood burning fireplace, heater or device on a curtailment day
 - **7 NOVs from Open Burning (Residential and Agricultural)**
 - **6 NOVs from failing to maintain or pass vapor recovery testing at Gasoline Dispensing facilities**
 - **3 NOVs from Dust/Trackout at construction sites**
 - **Additional NOVs associated with unpermitted equipment, ISR, Diesel Idling**

Shafter 2022 Annual Report Summary *(cont.)*

- 72 total Notices of Violation (NOVs) issued in Shafter during 2021-22 reporting period



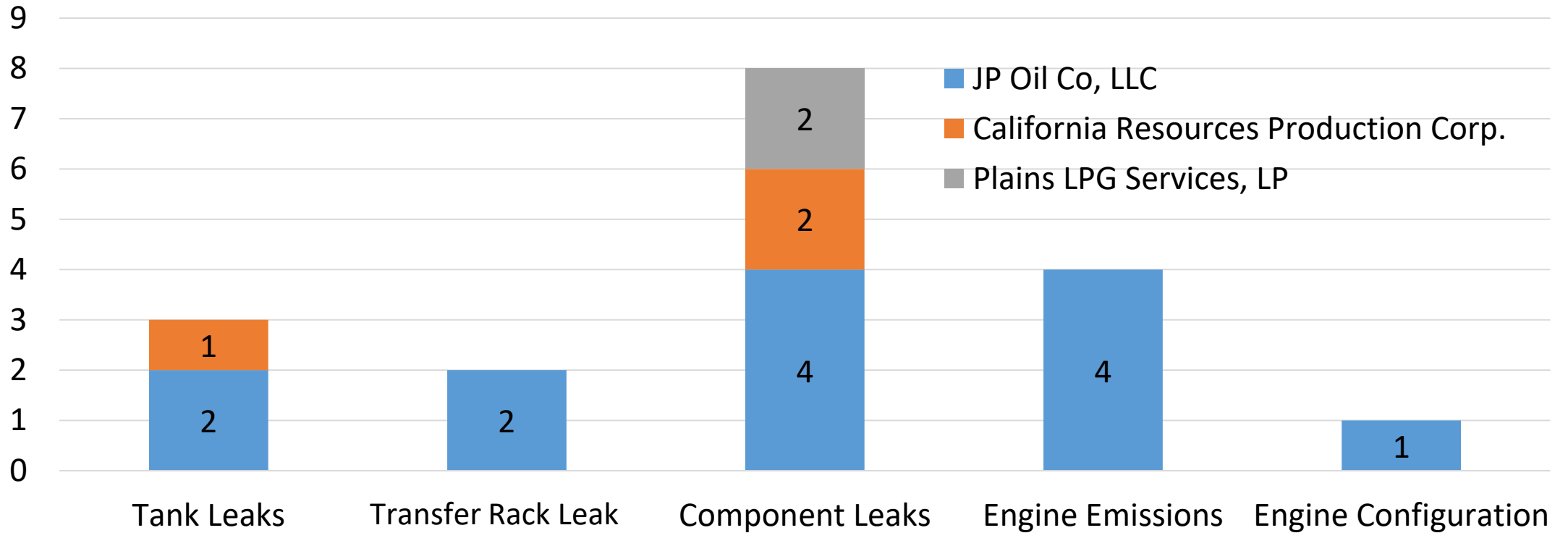
NOVs Issued to Oil & Gas Facilities in Shafter during 2021-22 Reporting Period

- JP Oil Co, LLC
 - **13 NOVs total**
 - 2 NOVs for tank leaks (Rule 4623)
 - 2 NOVs for leaks associated with transfer of organic liquids (Rule 4624)
 - 4 NOVs for light-oil component leaks (Rule 4409)
 - 3 NOVs for exceeding NOx and CO limits on IC engines (Rule 4702)
 - 1 NOV for exceeding NOx limits on IC engine (Rule 4702)
 - 1 NOV for failing to install a vertical vent stack on IC engine (Rule 4102)
 - All leaks were repaired within the timeframes of the rules and re-inspected for compliance
 - All engines were tuned/repared and re-inspected for compliance
- California Resources Production Corp.
 - **3 NOVs total**
 - 1 NOV for a COGR component leak (CCR, Title 17 Section 95669)

NOVs Issued to Oil & Gas Facilities in Shafter during 2021-22 Reporting Period *(cont.)*

- 1 NOV for light-oil component leak (Rule 4409)
- 1 NOV for tank leak (Rule 4623)
- All leaks were repaired within the timeframes of the rules and re-inspected for compliance
- Plains LPG Services, LP
 - **2 NOVs total**
 - 1 NOV for refinery component leaks (Rule 4455)
 - 1 NOV for refinery component leaks and transfer of organic liquids component leaks (Rules 4455 and 4624)
 - All leaks were repaired within the timeframes of the rules and re-inspected for compliance

NOVs Issued to Oil & Gas Facilities in Shafter during 2021-22 Reporting Period *(cont.)*



- All violations have been corrected, and confirmed during follow-up inspections.

Questions?