## Arvin/Lamont Community Compliance & Enforcement

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## 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 Stationary Sources of Air Pollution

- 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 stationary sources of air pollution
- Respond to and investigate public complaints
- Take enforcement action when non-compliance is found, and ensure violators promptly return to compliance



### **District Rules Reducing Air Pollution in Arvin/Lamont**

Rule 4307: Boilers, Steam Generators and Process Heaters

Rule 4311: Flares

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 4612: Motor Vehicle and Mobile Equipment Coating Operations

Rule 4623: Storage of Organic Liquids

Rule 4702: Internal Combustion Engines

**Regulation VIII:** Fugitive PM10 Prohibitions

**Others:** Additional Rules May Be Applicable



## Enhanced Enforcement Measures in Arvin/Lamont CERP



#### Enhanced Inspection Frequency of Stationary Sources

 Facilities with emissions-related violations will be inspected twice per calendar year



#### **Enhanced Enforcement of Statewide Anti-Idling Regulation**

• Targeted quarterly surveillance



#### Enhanced Enforcement of Regulation VIII Rules

- Targeted enforcement during  $2^{nd}$  and  $3^{rd}$  quarters



## **Stationary Sources of Air Pollution**







## **Stationary Sources of Air Pollution**

**Automobile Coating** 



#### **Construction Dust**





## **Stationary Sources of Air Pollution**



- Flares are an essential part of a refinery's overall safety strategy, ensuring the protection of personnel, nearby communities, and the environment from potential accidents and incidents involving flammable materials.
- In case of process upsets or equipment failures, flares can quickly alleviate pressure and act as a destruction device for VOCs.
- Flare emissions are regulated with set limits and facility requirements of monitoring and record keeping.



## **Examples of Oil & Gas Operator Requirements**

Operator Leak Detection and Repair (LDAR)
 Tank Preventative Inspection and Maintenance
 Emission Monitoring
 Source Testing
 Screening Tank Components with OGI Ca
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## **Air Monitoring**

#### SJVAPCD AB617 Community Monitor

ountain View Middle Schoo

12 AM 1 AM 2 AM 2 AM 2 AM 4 AM 4 AM 6 AM 6 AM 6 AM 6 AM 10 AM 11 AM 12 JPM 2 PM 3 PM 4 PM 5 PM 6 PM 6 PM

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Community Level Monitoring at Refine

Air Purifier! Available to Valley residents in disadvantage

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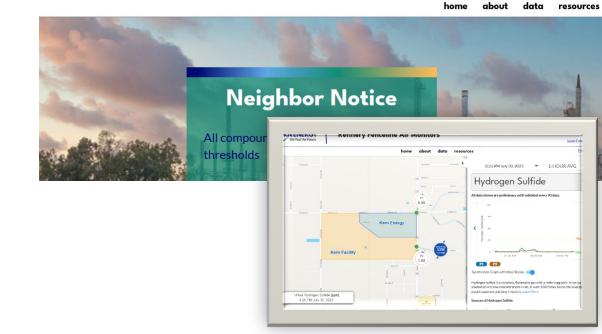
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#### **Refinery Fence line Monitoring Program**

https://kern4460.com/



**Refinery Fenceline Air Monitors** 





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## How does the District Conduct Inspections?









## What tools are used during District Inspections?







Continuous Emission Monitoring System (CEMS)

# Inspectors use specialized equipment: Hydrocarbon Analyzers Portable Exhaust Gas Analyzers Optical Gas Imagery (OGI) Camera

Source Testing





OGI Camera

Visible Emission Evaluation – Method 9

Other tasks during inspections:
Visible Emission Evaluations
Record Review
Observe Continuous Emission Monitoring Systems (CEMS)



## **District Inspections**



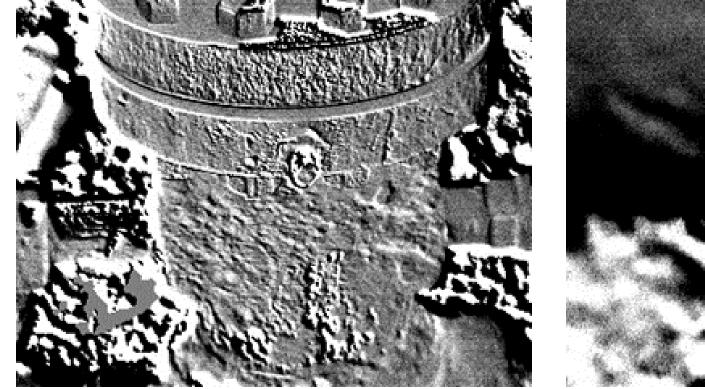


LDAR Inspection with Eagle 2 Analyzer



## **Optical Gas Imagery**

#### Well





Tank



## **Verifying Compliance With Permit Conditions**

- Example Permit Condition Leak Standards
  - The operator shall be in violation of Rule 4455 if any District inspection demonstrates that one or more of the conditions in Section 5.1.4 (Leak Standards) exist at the facility.
- Equipment Used





OGI Camera





## **Verifying Compliance With Permit Conditions**

- Example Condition Combustion Exhaust
  - Emission rates shall not exceed any of the following: NOx (as NO2): 25 ppmv @3%
     O<sub>2</sub> or 0.031 lb/MMBtu, CO: 400 ppmv @ 3% O<sub>2</sub> or 0.30 lb/MMBtu.
- Equipment Used







## When is Enforcement Action Taken?

When the inspector notes something in the community that is not in compliance with applicable rules, enforcement action is taken

# Examples of violations that would result in enforcement action

- Exceedance of Emission Rates & Standards
- Failure to Repair VOC Leaks
- Illegal burning / burn barrels
- Late Testing
- Failure to Test and/or Monitor
- Failure to Maintain Records
- Unpermitted Equipment





## Complaints

- The District receives thousands of complaints each year, prioritizing timely response and investigations of alleged non-compliant sources.
- After business hours, an automated bilingual complaint hotline directs complaints to on-call inspectors available 24/7 to address concerns and protect public health.
- Complaints can be filed via telephone, online, or through the Valley Air app.
- District staff contact reporting parties to gather information on the complaint's root issue and keep them informed until the investigation is completed.
- Multilingual translation services are provided in the field or over the telephone to ensure all Valley communities are served.



## How to File an Air Pollution Complaint in Arvin-Lamont

- Complaints can be filed 24/7, 365 days a year online through <u>ww2.valleyair.org/file-a-complaint</u>, the Valley Air app, or by calling 800-926-5550 (toll free)
- What to report
  - Potential air quality violations
  - Odors
  - Illegal burning/burn barrels/smoke
  - Smoking chimneys or outdoor wood burning devices on restricted burning days (Nov.-Feb.)
  - Dust or trackout from construction sites





