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
 Sampling





Air Monitoring

SJVAPCD AB617 Community Monitor

ountain View Middle Schoo

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San Joaquin Valley

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AB617 Reducing em

Community Level Monitoring at Refine

Air Purifier! Available to Valley residents in disadvantage

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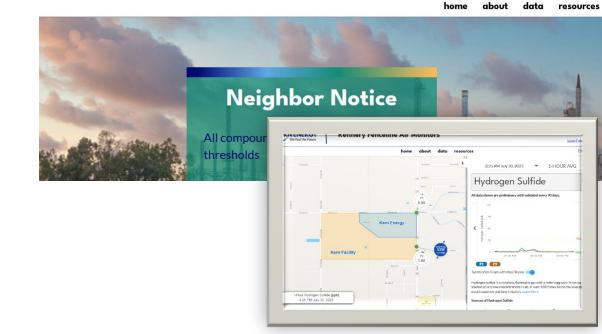
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Refinery Fence line Monitoring Program

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



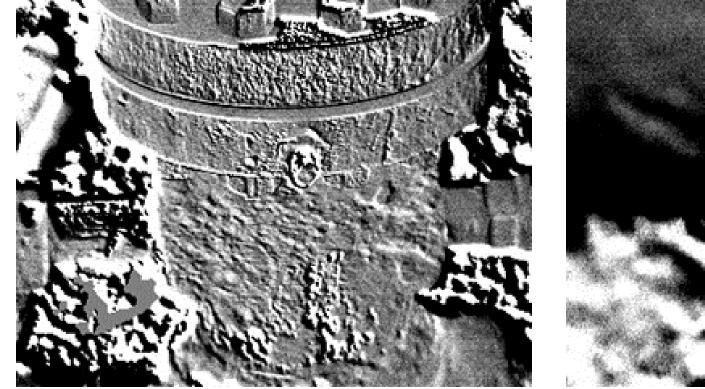


LDAR Inspection with Eagle 2 Analyzer



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%
 O₂ or 0.031 lb/MMBtu, CO: 400 ppmv @ 3% O₂ 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





