

# 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<sup>nd</sup> and 3<sup>rd</sup> quarters

# Stationary Sources of Air Pollution

Small Oil Production Operation



Large Oil Production Operation



Tank Battery



# Stationary Sources of Air Pollution

Automobile Coating



Generator Engines



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
- Sampling

Screening Tank Components with OGI Camera



# Air Monitoring

## SJVAPCD AB617 Community Monitor

[www.valleyair.org](http://www.valleyair.org)

## Refinery Fence line Monitoring Program

<https://kern4460.com/>

San Joaquin Valley  
AIR POLLUTION CONTROL DISTRICT

HOME LINKS GENERAL FEEDBACK ESPAÑOL SITE MAP

Search:

**CLEAN AIR ROOMS**  
Get a **FREE Residential Air Purifier!**  
Available to Valley residents in disadvantaged and low-income communities  
[valleyair.org/roompurifier](http://valleyair.org/roompurifier)

Free air purifiers for Valley residents!

**FEATURED ITEMS**

- \$\$\$ Clean Air Rebates and Grants for Residents and Businesses
- Free air purifiers for Valley residents!
- Big money available for Zero Emission Landscaping Equipment
- AB617** Reducing emissions in disadvantaged communities
- Community Level Monitoring at Refineries**



## Refinery Fenceline Air Monitors

home about data resources

**Neighbor Notice**  
All compounds below thresholds

**Refinery Fenceline Air Monitors**

home about data resources

8:25 PM July 30, 2023 1-HOUR AVG

**Hydrogen Sulfide**  
All data shown are preliminary until validated every 30 days.

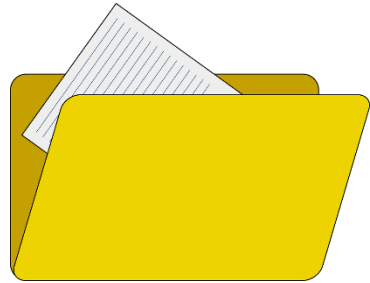
Hourly Hydrogen Sulfide Concentration (ppb)

Hour	ppb
12 AM	0
1 AM	0
2 AM	0
3 AM	0
4 AM	0
5 AM	0
6 AM	0
7 AM	0
8 AM	0
9 AM	0
10 AM	0
11 AM	0
12 PM	0
1 PM	0
2 PM	0
3 PM	0
4 PM	0
5 PM	0
6 PM	0
7 PM	0
8 PM	0
9 PM	0
10 PM	0
11 PM	0
12 AM	0

1-hour Hydrogen Sulfide (ppb)  
8:25 PM July 30, 2023

Sources of Hydrogen Sulfide

# How does the District Conduct Inspections?



**REVIEW**



**QUESTIONS**



**RESEARCH**

# What tools are used during District Inspections?

Inspectors use specialized equipment:

- Hydrocarbon Analyzers
- Portable Exhaust Gas Analyzers
- Optical Gas Imagery (OGI) Camera
- Source Testing

Other tasks during inspections:

- Visible Emission Evaluations
- Record Review
- Observe Continuous Emission Monitoring Systems (CEMS)



TVA



Testo



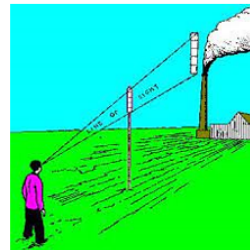
Continuous Emission Monitoring System (CEMS)



Eagle 2



OGI Camera



Visible Emission Evaluation - Method 9

# District Inspections



Screening with OGI Camera



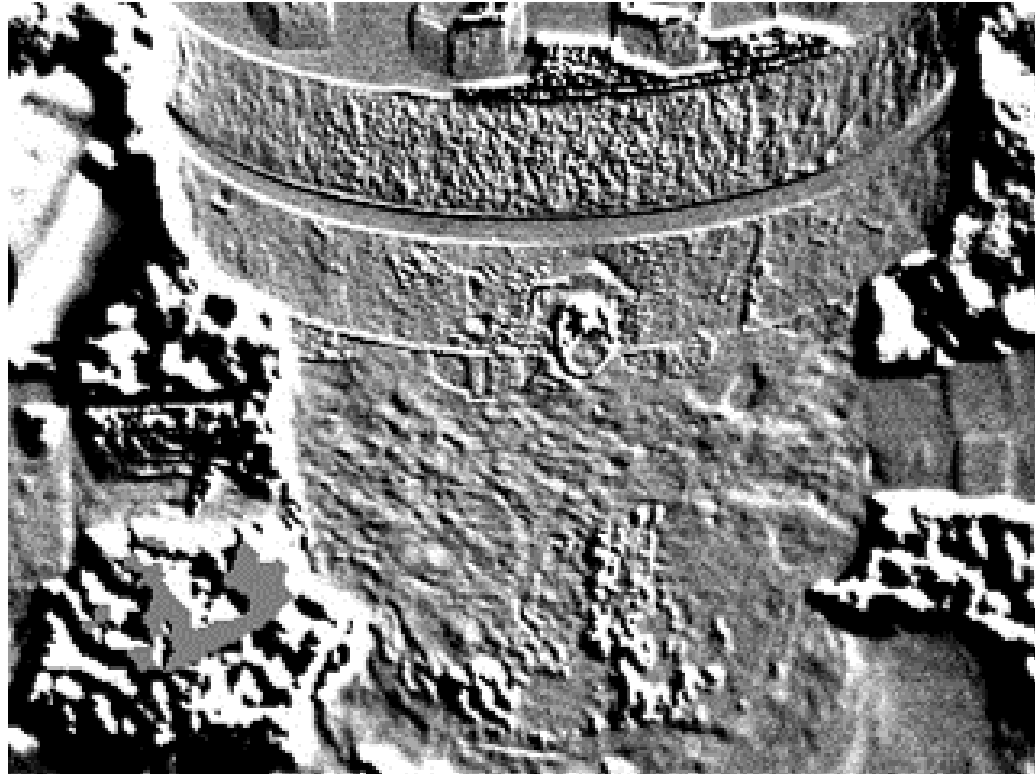
LDAR Inspection with Eagle 2 Analyzer



# 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



TVA



Eagle 2

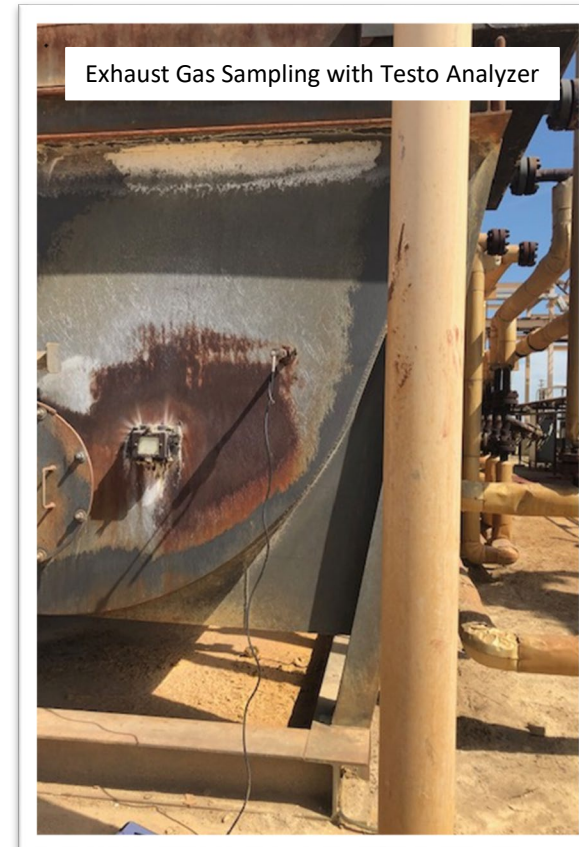


OGI Camera



# Verifying Compliance With Permit Conditions

- Example Condition – Combustion Exhaust
  - Emission rates shall not exceed any of the following: NO<sub>x</sub> (as NO<sub>2</sub>): 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 [ww2.valleyair.org/file-a-complaint](http://ww2.valleyair.org/file-a-complaint), 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

# Questions?