

Arvin/Lamont Community Compliance & Enforcement

Dylan Born – Air Quality Inspector II

Jaylynn Franco-Hackler – Air Quality Inspector I

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 2nd and 3rd quarters

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 and Petroleum Refineries

- Adopt and implement local rules and enforce local, state and federal rules and regulations
- Issue permits and registrations for equipment and operations that are subject to local, state, and federal rules and regulations
- Conduct inspections of oil and gas facilities and refineries
- Respond to and investigate public complaints
- Participate in taskforces with partner agencies including EPA, CARB, and CalGEM on focused enforcement efforts



Rules & Regulations that Apply to Oil & Gas Facilities

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 4623: Storage of Organic Liquids

Rule 4702: Internal Combustion Engines

State Regulation: CARB's California Oil & Gas Regulation (COGR)

Federal Regulations: EPA's Standards of Performance for Crude Oil and Natural Gas Facilities (40 Code of Federal Regulations 60 Subpart OOOOa)

Types of Oil Production Operations

Small Oil Production Operation



Large Oil Production Operation



Tank Battery with Flares



Types of Oil Production Equipment



Steam Generator Bank



Reciprocating Pump (Pump Jack)



Well Header System



Sulfur Removal System



Piping and Valves



Rules & Regulations that Apply to Petroleum Refineries

Rule 4307 & 4320: Boilers, Steam Generators and Process Heaters

Rule 4311: Flares

Rule 4455: Components at Petroleum Refineries

Rule 4460: Petroleum Refinery Fence-Line Air Monitoring

Rule 4623: Storage of Organic Liquids

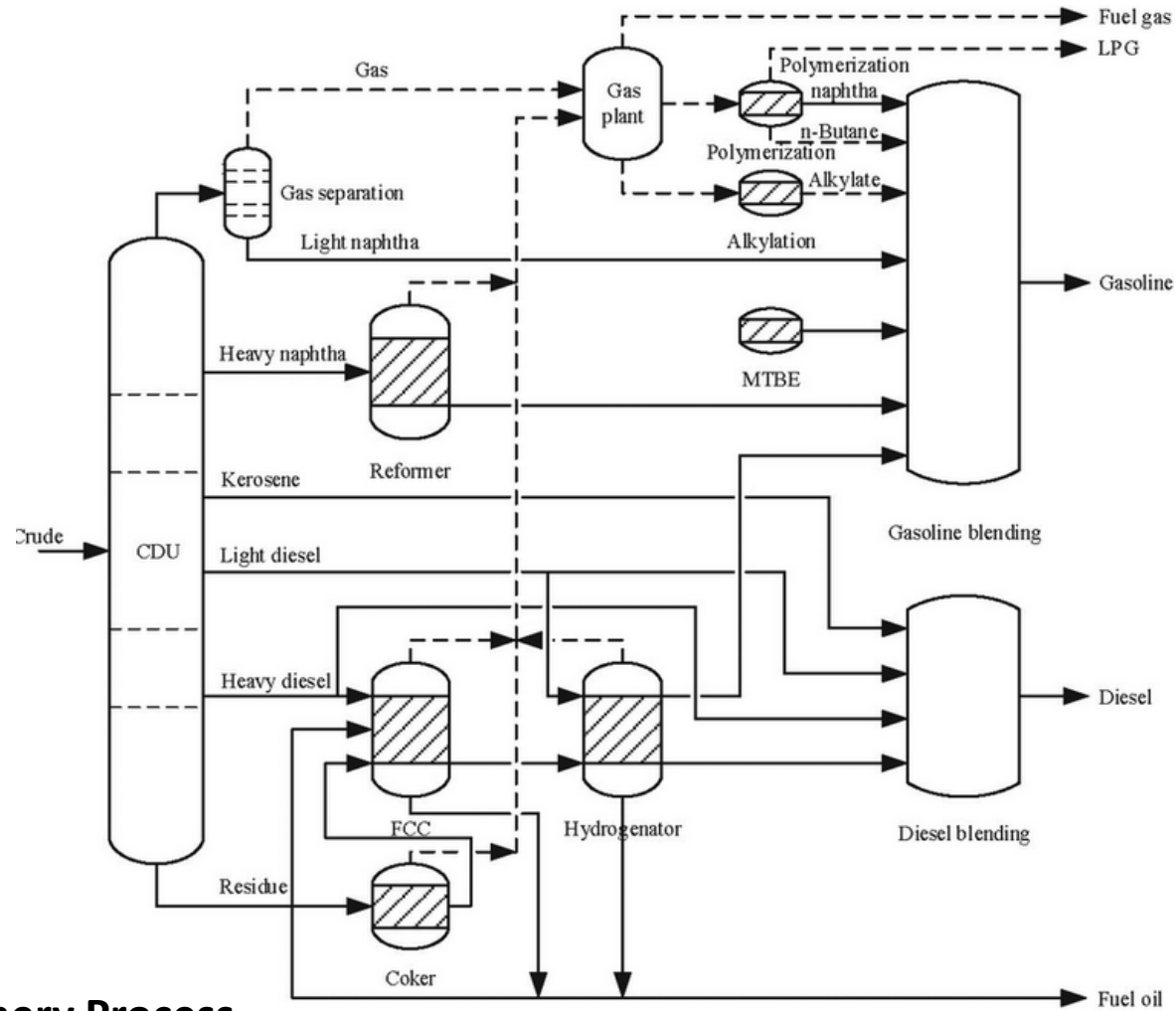
Rule 4624: Transfer of Organic Liquids

Rule 4625: Wastewater Separators

Rule 4702: Internal Combustion Engines

Others: Additional Rules Maybe Applicable

Petroleum Refineries



Schematic of Simple Refinery Process

Petroleum Refineries



Refinery Heaters and Reactor



Flare and Refinery Process Unit

Petroleum Refineries



Transfer Rack



Tank Farm



Cogeneration System

How does the District Conduct Inspections?

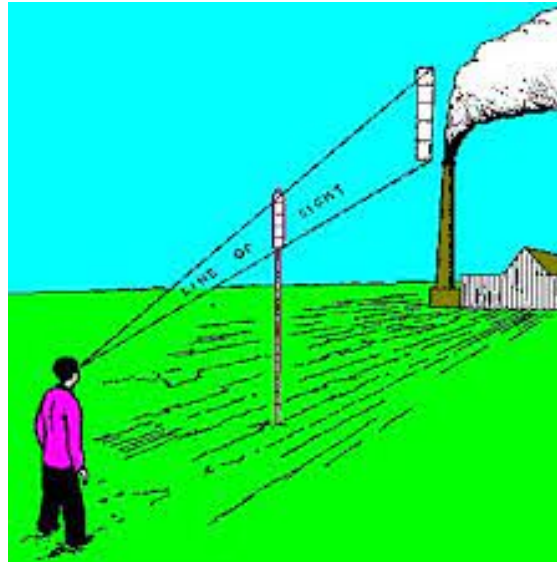


Inspectors use specialized equipment:

- 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) Inspections
- Tank Preventative Inspection and Maintenance
- Emissions Monitoring
- Third-Party Source Testing
- Sampling
- Fence-line Monitoring



When is Enforcement Action Taken?

When a District Inspector notes something at the facility that is not in compliance with applicable rules, they take enforcement action, most often in the form of Notices of Violation (NOV)

Examples of violations that would result in enforcement action

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



Assisting Facilities to Comply with Requirements

- Email lists that operators can sign up for to receive updates regarding upcoming public meetings regarding specific equipment/operation categories
- Extensive compliance assistance in the form of Compliance Assistance Bulletins regarding recent rule amendments
- While performing inspections, District staff share important information with the operator regarding their District issued permits to ensure they understand the requirements they are subject to
- When violations observed, District staff work with facility operators to make corrections as quickly as possible, with majority of the violations repaired at the time of detection

NOVs Issued to Arvin/Lamont Oil & Gas Facilities and Refinery during Q4 (2022) & Q1 (2023)

- 29 NOVs Issued to Oil & Gas Facilities
 - Includes violations discovered during District inspections and self-reported by the facility
 - Violations consisted of emission violations, failure to monitor exhaust gases, and failure to submit administrative paperwork
- District pulling together a detailed list of all NOVs within community boundary to send out to CSC

Questions?