Interagency/AQMD/Fenceline Monitoring Presentation

Meeting Notes 9/26/18

AQMD Presentation (Payam Pakbin)

Q: Clarifying question was asked on technical aspects of the air monitoring AQMD did

A: Average concentration across 24 hours, 1 in 6 days sample

Q: What's the plan for after opening?

A: TBD – will still do monitoring, maybe just at trailer; other survey at mobile stations.

Q: What triggered/triggers air monitoring action?

A: Starts with a complaint. If AQMD determines a complaint is valid, sample should be collected. There should be different tools in place to analyze.

Q: It's notable that air concentrations were below regulatory thresholds, but that's not a good indicator of health concerns because it doesn't pick up odors…

A: AQMD measurement provides baseline to compare future activity against. Would like to see future levels below previous activity levels.

Q: Were air monitoring results reported in real time?

A: That info was available to AQMD but was not published in real time. Will be in the future. To get past reports, need to submit a PRA request.

Q: Is there a plan to establish RELs for other compounds?

A: No. RELs are based on literature; only available for those with known health effects.

Discussion of sending inspectors:

- AQMD sends an inspector. Does DPH? LA City? DPH would love to send inspector to accompany AQMD and City. Have been trying to do that for a long time. Set up an interagency odor strike team.

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- LA City needs all complaints reported to them. The City Attorney enforces the injunction as prosecuting agency. Can enforce AQMD rules and others – offers more tools for regulatory enforcement.
- What about training promotoras to investigate odors? LA City: there will be evidentiary problems with that. They aren't a neutral party.
- Other agencies that send inspector: City Fire Dept., CUPA. Hazmat goes out same day.

Re AQMD inspections/inspectors:

- Insufficient resources to equip all inspectors with sensory equipment.
- Mostly use sense of smell.
- Look at prevailing winds, verify odor with complainant if possible.
- Follow odor to its source.
- Have "hot list" of sites where there have been repeated problems.
- Deploy inspector for 1 complaint if facility is on hot list
- Also check for violations of permit conditions

Exponent Presentation (Eric Winegar)

- History: there was a T-shaped stack with a vent to open sump. This is probable cause of issues in 2013. Also, there were tank lids that were painted fiberglass, as opposed to metal (or whatever material they're supposed to be).
- Eric has asked operator for before and after drawings but has not received them.
- Changes: Sump is gone, replaced by pipe(s), vapor control – system designed to capture everything and dispose of appropriately
- There are 21 wells; 8 will be active. Valves are 8 ft deep; compression pumps enclosed in a fence.
- Fugitive emission sources would be below grade.
- AQMD (Payam) noted that based on data presented by Eric, there were 5 tier 2 events in October 2013. Eric had represented it somewhat differently, saying half the time period monitored levels exceeded tier 2 thresholds.

Air monitoring:

- Installed methane detector, "fire eyes" with water deluge spray
- Not doing toxics in real time, too expensive
- Will be monitored 24/7 by outside party (not clear if this is Eric) with direct line to Fire Department

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- Glitch that needs to be worked out: water deluge system recently deployed during power outage – need to find out why
- Goal is to capture fugitive emissions during normal operations
- 4 separate inlets; integrated data system
- Teflon start to finish
- Data goes through an operator (Eric) to validate to prevent instrument glitches causing false positives. Not dependent on an algorithm, will go past human eyes

Tier system for emissions – what are the impacts and responses?

- Tier 1 – event that stays within facility walls; operator goes out to investigate (sniff)
- Tier 2 – event with possible community impact; notice made to community
- Tier 3 – emergency; shut down all operations; notify all relevant agencies

More info on operation of Tier system

- Intrinsic toxicologist set odor thresholds based on known health effects
- If a threshold is met, the system operator (Eric) accesses the data, validates, and notifies site operator who does immediate inspection.
- There are thresholds for 3 (compounds? chemicals? hydrocarbons? – need to clarify that meeting the threshold for any ONE of these would trigger an action vs. rather than needing to meet the thresholds for all 3 to trigger an action.
- Per the injunction, the facility operator must perform whatever repair is needed and certify to LA City that the problem is remediated.
- In Tier 1 event, site operator supposed to be notified w/in 2 hours
- Community-facing website will show real-time data
- If there are 5 Tier 2 events in 1 month, the facility operator receives a warning. If there are 10 in 1 month, it turns into an automatic Tier 3 requiring facility shutdown

Re: Written procedures, plans, protocols

- What is the shutdown procedure? Agencies need to see and review plan. AQMD concern is that sometimes shutdown and restarting can cause more emissions.
- Response for different Tiers needs to be fleshed out. Same with communication and community response plans.
- It will be important to line up times of occurrences across monitoring data, responses by operators, agency actions, etc.
- Need to have a decision-tree in place. Eric states that there is a system in place that would alert him automatically, and then he would trigger further communication/notification manually.

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However, details on how this would work have not been established and agencies need to review.

Re: Coordination – need to discuss further

- AQMD will put Allenco on hot list
- LA City asks that when anyone gets complaints, can we verify if there was a Tier 1 or 2 event and notify City? Comprises evidence City can use in enforcement.

Re: Potential sale of Allenco (intends to sell shortly after re-opening)

- Injunction still applies to new owner
- Potential buyer excited about controls now being put in place
- Note: AQMD has requirements when there is a change in operator that would trigger requirements and regulations that AQMD will then enforce.

Other comments:

- LAUSD very concerned about potential for methane seepage and explosive events. LA City advised that's an issue to discuss with DOGGR. LAUSD expressed lack of confidence in DOGGR based on past interactions.
- The overlooked exposure pathway is to fugitive emissions in the community beyond the facility property line that potentially result from poorly managed injection water from oil production operations displacing natural gas in the subsurface and forcing it to seep to the surface via improperly abandoned exploration coreholes and geologic fractures associated with the Lower Elysian Hills fault underlying the site.
- When community meeting is held, Exponent would like the interagency group to say they have reviewed the plans, operator has a "tight ship," and agencies are behind it.
- Eric and operator not clear on the approval process for start-up. Jessica/City of LA will reach out to agencies that still need to approve – EPA, DOGGR – to coordinate.