

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
ADVISORY COMMITTEE MEETING
June 27, 2023
MINUTES

Director's Report

Ali R. Ghasemi, Air Pollution Control Officer shared that regarding staffing the District has filled three Air Quality Specialist positions and is working on filling a Rule Making Engineering position. Applications are still being accepted for the open Public Information Officer position. Additionally, Sam Michie was promoted to Monitoring Manager. On June 13, 2023, the Air Pollution Control Board (Board) reappointed Thomas Lucas, Stephen Frank, Hugh McTernan, Sara Head, and Steven Colomé to the APCD Advisory Committee. On June 27, 2023, the Board approved the District's fiscal year 2023-2024 budget.

A draft permit to construct was issued for the Simi Valley Landfill project. The Simi Valley Landfill Project is a renewable energy project that converts methane gas into quality natural gas that can be used in pipelines.

Last year the District applied for incentive money to continue funding the Vessel Speed Reduction (VSR) incentive program and is waiting on approval. Mr. Ghasemi discussed statewide Assembly Bill (AB) 953, voluntary vessel speed reduction and sustainable shipping program. AB 953 would require implementation of a statewide voluntary vessel speed reduction and sustainable shipping program for the California coast in order to reduce air pollution, the risk of fatal vessel strikes on whales, and harmful underwater acoustic impacts. AB 953 has passed through the Assembly and is currently on the Senate floor.

Rule 71.1 will be brought to the Board in July and Rule 74.35 will be brought to the Board in September.

I. Call to Order

Chair Sara Head called the meeting to order at approximately 6:53 p.m.

II. Roll Call

Present

Jay Berger	Donald Bird
Edward Carloni	Steve Colomé
Stephen Frank	Jan Hauser
Sara Head	Rainford Hunter
Kirsten Marble	Hugh McTernan
Paul Meehan	Richard Nick

Excused

Joan Burns

Thomas Lucas

Leslie Cornejo

Aracely Preciado

Absent (not excused)

Jennifer Hernández

Michael Hughes

Staff

Ali Ghasemi

Tyler Harris

Holly Galbreath

John Henkelman

Public

Trent Rosenlieb

III. Election of Officers

Vice Chair Paul Meehan moved to reelect Sara Head as Chair. Steve Colomé seconded the motion. The Committee unanimously voted yes.

Richard Nick moved to reelect Paul Meehan as Vice Chair. Hugh McTernan seconded the motion. The Committee unanimously voted yes.

IV. Minutes

Sara Head asked if any members would like to make a motion to approve the minutes. Stephen Frank moved to approve the minutes of the November 29, 2022, Advisory Committee Meeting. Hugh McTernan seconded the motion. The Committee voted ten yes and one abstention.

V. Chair Report and/or Comments from the Committee (not related to agenda items)

Chair Sara Head did not have a Chair report. The Committee did not have any questions or comments for items not on the agenda.

VI. Public Comment

There was no public comment.

VII. Old Business

There was no Old Business.

VIII. New Business

Proposed Amendments to Rule 71.1 Crude Oil Production and Separation

Ali Ghasemi provided an overview of the proposal to amend Rule 71.1 and a brief PowerPoint presentation. The purpose of the proposed amendments is to address deficiencies in the rule due to EPA's disapproval of CARB's Oil and Gas Methane Rule. Rule 71.1 was originally adopted on June 20, 1978, and last amended June 6, 1992.

The proposed amendments include updates to Sections B.1.b and C.1.c to change the control efficiency from 90% to 95%. Also included are updates to Sections B.1.a and C.1.b to include additional requirements for flares (i.e., continuous pilot light, testing the flare's ignition system, etc.). Amendments also include sunseting the exemption under section D.4. Section E.1 will now require 5 years of recordkeeping. Sections F.1.a. and F.1.b. will include the full title of test methods, and the test method identified under section F.3. will be updated with the more recent EPA approved version. A visual emissions test method for monitoring flare emissions was included in Section F.4.

In response to EPA Region 8's partial disapproval of Colorado Rules, the following language was added to subsection E.6. of Rule 71.1, "All records required by this rule shall be submitted to the Air Pollution Officer no later than December 31st of the next calendar year."

Jan Hauser asked if the new visual inspection requirement is something District staff conducts to which Mr. Ghasemi responded, "no." Mr. Ghasemi also clarified that the rule amendments would have no cost to operators. Rainford Hunter asked if the District has reached out to Title V facilities regarding the Rule 71.1 amendments. Mr. Ghasemi clarified that public outreach was conducted and there were no known concerns from those facilities. Steve Colomé asked how many Title V facilities are within the District that fall under Rule 71.1. Mr. Ghasemi stated that the District has about 27 Title V facilities.

The rule is scheduled to go before the Board on July 11, 2023

Sara Head asked if there were any comments from the public. The only member of the public, Trent Rosenlieb, had no comments and stated that the industry was able to participate in the workshop on June 6th for Rule 71.1.

Jay Berger made a motion that the Committee recommend to the Air Pollution Control Board the rule amendments be adopted as written by staff. Richard Nick seconded the motion. The Committee unanimously voted yes.

Proposed New Rule 74.35, Flares

Tyler Harris provided an overview of the new Rule 74.35 and a brief PowerPoint presentation. The purpose of the new rule is to conform with California Health and Safety Code Section 40919 which requires all feasible measures be implemented for all designated “serious” nonattainment areas. Additionally, AB 617 expedited the schedule for implementation of best available retrofit control technology (BARCT).

Rule 74.35 is a new rule regulating flare equipment that is greater than or equal to one million British thermal units (MMBtu) per hour. This rule applies to oil and gas operations, landfills, digesters, and reactive organic compounds (ROC) liquid loading. New, replacement, or relocated flares must meet the emission limits within Table 1 of Rule 74.35. Replaced flares will be limited to throughputs of 110% of the previous 3-year average annual throughput of the existing flare or 45 million standard cubic feet per year (MMscf/year). For new flares, annual throughputs will be limited to 45 MMscf/year. Existing flares exceeding annual capacity thresholds listed in Table 2 of Rule 74.35 will be required to prepare and submit a Flare Reduction Plan (FRP) within 6 months from the end of the 2nd consecutive year of exceedance. Applicable open flare facilities will be required to submit a Notification of Flare Inventory and Capacity within 30 days of rule adoption. Rule 74.35 also includes general best management practices including regular maintenance and monitoring. All new, replaced, or relocated flares must be labeled with the model number and rated capacity after rule adoption, and must be enclosed after December 31, 2023. Additionally, flares shall be smokeless after December 31, 2023.

In response to EPA Region 8’s partial disapproval of Colorado Rules, the following language was included in subsection D.6. of Rule 74.35, “All records required by this rule shall be submitted to the Air Pollution Officer no later than December 31st of the next calendar year.”

The rule is scheduled to go before the Board on September 12, 2023.

Sara Head asked the Committee if there were any questions. Paul Meehan asked a question regarding definition number 13 (“Modifications”), specifically if split flares could be utilized to be exempt from Rule 75.35. District staff John Henkelman stated that existing District regulations prevent circumvention of split flares. Jan Hauser asked where the percentages regarding the annual capacity thresholds within Table 2 derived from. Ali Ghasemi responded that the thresholds were from South Coast Air Quality Management District (SCAQMD). Rainford Hunter asked what feedback the District received from operators who may need to replace flares per Rule 74.35. Ali Ghasemi stated that operators don’t believe they will need to replace their flares and will instead utilize other options within Rule 74.35. Furthermore, Ali Ghasemi discussed the ongoing collaboration with the industry during development of Rule 74.35. Kirsten Marble asked if the violations section of Rule 74.35 should reference the consequences of such a violation within the rule language. Ali Ghasemi responded that the

process of responding to a violation is provided on the District's website and such language does not need to be included in the new rule.

Trent Rosenlieb, a member of the public, offered his appreciation for the opportunity to work on Rule 74.35. Moreover, he stated that the goal of the oil and gas industry is to minimize flaring whenever possible. He also commended the restrictions to split flares and expressed how well documented the violation process is.

Steven Frank made a motion that the Committee recommend to the Air Pollution Control Board adoption of the proposed new Rule 74.35 as written by staff. Paul Meehan seconded the motion. The Committee unanimously voted yes.

IX. Committee Business: Proposed Amendments to Advisory Committee Bylaws

Tyler Harris proposed changes to the Committee bylaws including updating the address of the location of meetings, changing the meeting start time to 6:30 p.m., and having meetings occur on the third Tuesday of each month. Sara Head proposed including language to state that the Committee may also meet at an alternative time and date at the discretion of the Committee members. Hugh McTernan made a motion to approve the changes to the bylaws. Jay Berger seconded the motion. The Committee unanimously voted yes.

X. Adjournment

Having no further business, the Chair adjourned the meeting at approximately 8:33 p.m.

Prepared by:
Holly Galbreath
Air Pollution Control District Staff