

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT  
ADVISORY COMMITTEE MEETING  
November 30, 2023  
MINUTES

Director's Report

Ali R. Ghasemi, Air Pollution Control Officer shared that regarding staffing, the District has filled the Public Information Officer position. All other District operations continue as normal. Additionally, the District's budget for fiscal year 2024 to 2025 is in good standing. The District is also expanding its incentive programs. The District's AB 617 funding may also be increasing but the amount is not known yet. Two oil platforms within District jurisdiction will be decommissioned within a year. EPA is proposing lowering the national PM2.5 standard, the final decision of which should be known by the end of the year. EPA is also considering lowering the national ozone standard. District rules that have been submitted to EPA are being reviewed and due to recent litigation and new reporting requirements, it is expected that those rules may come back to the District for revising. As such, more Advisory Committee meetings can be expected next year. The District will also be submitting its Exceptional Events Mitigation Plan to CARB for review, which will then be sent to EPA.

I. Call to Order

Chair Sara Head called the meeting to order at approximately 6:33 p.m.

II. Roll Call

Present

Donald Bird	Edward Carloni
Steve Colomé	Leslie Cornejo
Stephen Frank	Jan Hauser
Sara Head	Rainford Hunter
Mary Kennedy	Thomas Lucas
Kirsten Marble	Hugh McTernan
Paul Meehan	

Excused

Joan Burns	Richard Nick
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Absent (not excused)

Jennifer Hernández	Aracely Preciado
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Staff

Ali Ghasemi	Holly Galbreath
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Tyler Harris  
Do Young Maeng

John Henkelman  
Eric Whetherbee

Public  
Michael McHale

Chris Logan

III. 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 August 15, 2023, Advisory Committee Meeting. Jan Hauser seconded the motion. The Committee voted 10 yes and 3 abstentions.

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

Chair Sara Head did not have a Chair report. Mary Kennedy, from Camarillo District 5 was welcomed as a new member of the Advisory Committee.

V. Public Comment

There was no public comment.

VI. Old Business

There was no Old Business.

VII. New Business

**Amended Rule 74.10, Components at Crude Oil and Natural gas Production and Processing Facilities &  
Amended Rule 71, Crude Oil and Reactive Organic Compound Liquids**

John Henkelman of the District provided a PowerPoint overview of the changes to amended Rule 74.10 and amended Rule 71. The purpose of amending Rule 74.10 is to meet EPA's Best Available Retrofit Control Technology (BARCT) guidelines and to harmonize with state and Federal guidance. The purpose of amending Rule 71, which consists of the definitions for the Rule 71.X series, is to be consistent with the changes to Rule 74.10.

Rule 74.10 requires leak detection and repair (LDAR) for oil and gas facilities within Ventura County. AB 617 expedited the schedule for implementation of BARCT as oil and gas facilities. Full BARCT implementation for the District is expected by December 31, 2023. The revisions to Rule 74.10 would be in line with the state's LDAR regulations and EPA's Control Techniques Guidelines (CTG). Exemptions to the rule include components that are buried below ground, components operating in a vacuum service, components used to supply compressed air,

pneumatic controllers using air or electricity to operate, and components that are not owned or operated by the oil production facility. Other exemptions include components handling produced water and components found on tanks, separators, wells, and pressure vessels used exclusively for crude oil with API gravity less than 20.

The major changes to Rule 74.10 include reducing the minor leak threshold from 1,000 ppmv to 500 ppmv, requiring open-ended lines be sealed except during attended operations, requiring same day reinspection for replaced or repaired components, adding hatches and PVRV/Varec-type valves to components requiring daily inspections. Additionally, major changes to the rule include removing the option of annual inspections after four quarters without leaks, requiring Operator Management Plans (OMP) to specify all components subject to the rule, and requirements for records made under this rule be submitted to the District annually. Repair times to fix leaks have also been shortened and will no longer differ between onshore and offshore sources. Component leak thresholds were revised to reduce the number of allowable leaks.

In response to questions from the Advisory Committee, District staff clarified that no new facilities would be subject to the rule. Additionally, there are no underground storage facilities within the District's jurisdiction. Questions were also raised regarding the proposed reduced repair times for leaks. District staff explained that the repair times were reduced as part of an effort to achieve BARCT and to align with requirements that other air districts have imposed regarding oil and gas facilities. Michael McHale from the public asked for clarification regarding the deadlines mentioned in footnote a of Table 1 in the revised rule. District staff clarified the deadlines regarding the 3- and 7-day time periods for leak repairs.

Rule 71 contains definitions for the series of 71.X rules. Rule 71 does not contain any requirements except included in the definition of "leak." Proposed revisions were made to Rule 71 to harmonize with the revisions made to Rule 74.10, and to add definitions from state guidance. The proposed revisions to Rule 71 include the addition of definitions for the terms "Component," "EPA Method 21 Instrument/Instrumentation," "Fitting," "Natural Gas Processing Facility," "Optical Gas Imaging (OGI)," and "Well." Additional, revisions to existing definitions are proposed for "Crude Oil," "Leak," "Major Gas Leak," "Minor Gas Leak," "Natural Gas," "Produced water," "Separator," and "Sump."

Sara Head asked if there were any other comments or questions. Chris Logan, a member of Aera staff, spoke on behalf of industry affected by the proposed rule revisions. He stated that while the proposed revisions will be more difficult to comply with, he understands that the District has proposed these amendments to meet state and federal regulations and that the revisions are achievable.

Edward Carloni made a motion that the Committee recommend to the Air Pollution Control Board adoption of the proposed amendments to Rule 74.10 as written by staff. Hugh McTernan seconded the motion. The Committee voted 11 yes and 2 no. Committee members Stephen Frank and Thomas Luccas who voted 'no' cited their reason as being the proposed shortened

repair period times which could result in fiscal impacts to industry in the form of increased fines for not meeting the revised repair period times.

Paul Meehan made a motion that the Committee recommend to the Air Pollution Control Board adoption of the proposed amendments to Rule 71 as written by staff. Hugh McTernan seconded the motion. The Committee voted 12 yes and 1 no. Committee member Thomas Lucas who voted 'no' cited his reason as having a consistent consensus with his vote for Rule 74.10, which Rule 71 was revised to be consistent with.

VIII. Committee Business: Proposed Amendments to Advisory Committee Bylaws

The Committee discussed the upcoming meeting schedule in 2024. No other Committee business was discussed.

IX. Adjournment

Having no further business, the Chair adjourned the meeting at approximately 7:52 p.m.

Prepared by:

Holly Galbreath

Air Pollution Control District Staff