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August 16, 2018

California Air Resources Board
Criteria and Toxic Reporting Division
1001 I St.
Sacramento, CA. 95814

To whom it may concern:

The purpose of this letter is to provide feedback and comments on the recently released Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants, Subchapter 7.7, Article 1, sections 93400 to 93410, Title 17 of the California Code of Regulations (CCR). Signal Hill Petroleum, Inc. is an independent oil and gas producer in Signal Hill, CA and currently reports under the Mandatory Reporting Requirements of Title 17 of the CCR, section 95100. Under AB 617, Signal Hill Petroleum is now required to report criteria and toxic emissions to the California Air Resources Board. We have reviewed the proposed regulation language and have multiple comments and concerns. Please see below.

Section 93402 Definitions

“Portable” ... Equipment is not portable if any one of the following conditions exists:

- ...
- *The equipment or a replacement resides at the same location for more than 12 consecutive months...*

This definition insinuates that if a piece of portable equipment is placed at a certain facility for more than 12 months, regardless of usage, it is not considered portable. For example, a portable combustion unit is moved to a property and used for 3 days in February 2017. It then stayed in the same location, turned off and not in use until May of 2018, when it operated for 5 days at that facility. According to the definition as it is written, one could interpret that the combustion unit would not be considered portable for the 2018 reporting year. We do not believe this definition accurately describes the actual use of typical oil field portable equipment. We would recommend the following wording instead:

“Portable” ... Equipment is not portable if any one of the following conditions exists:

- ...
- *The equipment or a replacement **operates** at the same location for more than 12 consecutive months...*

Section 93403 Emission Reporting Requirements

General Comment:

The reporting timeline requirements are slightly confusing. It would be helpful to create a table or graphic to understand the complexities of who is required to report and when.

Section 93404. Emission Report Contents

(a)(5)(c-e) Identifying the release location height, flow rate and temperature is difficult to achieve with much accuracy for fugitive emissions. We request that ARB remove these requirements or understand that an engineering estimate will be the best available data.

(a)(10) This line is not clear upon reading (a)(5). Our suggestion is to merge (a)(10) and (a)(5) into one requirement, for example:

“(5) For each release location at the facility:

- (A) Release location identifier
- (B) Release location type (“fugitive” or “stack”)
- (C) Release location height above ground
- (D) Release location exit gas flow rate if applicable
- (E) Release location exit gas temperature
- (F) If the release location type is “stack” then:
 1. Release location stack diameter in feet
 2. Release location exit gas velocity in feet per minute
 3. Flow rate in actual cubic feet per minute

(G) The data in (a)(5)(A-F) must be collected and reported by May 1, 2021, or by the local air district’s reporting deadline if it is earlier than May 1. The data must be updated when there are physical changes to the facility structure or emissions release locations, or if there are substantive changes to emissions sources or operations, such as those requiring the addition or removal of district air permits.”

Section 93410, Implementation by CARB and by the Local Air Districts

(a)(1) This exposes businesses to undue double jeopardy. We request that this section be rewritten to include double jeopardy protection.

If you have any questions regarding our comments please feel free to contact me at ssmith@shpi.net or by phone at (562) 326-5246.

Thank you,



Shannon Smith
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