

August 28, 2012

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Ms. Rena Kambara
Los Angeles County
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

RE: Baldwin Hills Air Quality Study Work Plan
and Quality Control Plan

Dear Ms. Kambara,

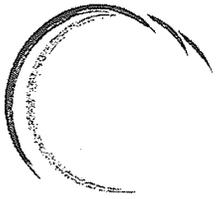
This office represent Citizen's Coalition for a Safe Community [CCSC]. Please consider the following comments on the Baldwin Hills Air Quality Study Work Plan and Quality Control Plan [hereinafter "Work Plan" or "WP"] presented by Sonoma Technology Inc. [STI].

CCSC notes that the STI Work Plan repeatedly identifies limited resources and lack of funds as a reason to limit the duration and scope of the project. Section 8 of the Settlement Agreement in *CHC et. al. v. County of Los Angeles*, states:

The County commits to spending up to \$250,000 of its own funds toward implementing the plan and shall use reasonable efforts to seek additional funding sources, if necessary, to implement the plan.

The Work Plan demonstrates that it is necessary to seek additional funds to properly implement the plan. For example, the study states, "Due to budgetary constraints, STI was forced to prioritize the pollutants..." [WP at 5.] For the operation of the PTR-TOFMS, the Work Plan notes "but budgetary constraints limit this option to two weeks of field study time." [WP at 7.] In comparing the methods of sampling between the PTR-TOFMS and the "passive measurement option", the Work Plan states, "However, both options are also limited, and neither will meet all of the monitoring objectives." [WP at 10.] When STI states that their own work plan will not meet all of the monitoring objectives, it is "necessary" to seek additional funds to ensure that the monitoring plan is adequate for its purpose.

We expect that the County will immediately seek additional sources of funds for a proper air quality study that fully achieves the objectives outlined in the Settlement Agreement. CCSC will provide one



Los Angeles County Department of Regional Planning
RE: BH Air Quality Study Work Plan
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month from the date of this letter for the County to identify grant or loan opportunities to further support the study and apply for such additional funds. If after one month, the County cannot provide written documentation demonstrating "reasonable efforts" to seek additional funds, CCSC is hereby putting the County of Los Angeles on notice that it will seek to specifically enforce the settlement agreement. [Settlement ¶ 19.]

My client will be independently identifying other concerns with the Work Plan. For example, the study does not appear to seek to identify compounds such as hydrogen sulfide or methane that may be released during drilling and fracking operations. Instead, it appears to concentrate on diesel particulate matter, which appeared to be studied and modeled during the EIR process. [See EIR Table 4.2.9 at p. 4.2-28, Table 4.2.10 at p. 4.2-31.] These comments are not intended to supersede the other comments from CCSC.

Thank you very much for your careful review of this correspondence. I look forward to hearing from you, and working with the County to protect the neighborhoods surrounding the Inglewood Oil Field.

Sincerely,

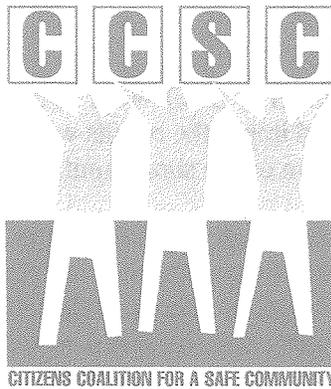

Todd T. Cardiff, Esq.
Attorney for CCSC

From: CCNLA@aol.com [CCNLA@aol.com]
Sent: Friday, August 31, 2012 1:46 PM
To: Rena Kambara
Cc: ccnla@aol.com
Subject: Questions for B.H. Air Quality Study

Dear Rena,
Here are my questions:

- (1) If rainfall occurs while the XACT metals monitor is installed in January and February, will the precipitation adversely affect measurements? Will rainfall adversely affect the spring and early summer measurements of the PTR-TOFMS VOC monitor? If so, will additional time be added to the two-week monitoring period?
- (2) If the drilling operations are not in full force during the short periods the XACT 625 metals monitor and the PTR-TOFMS VOC and Carbonyl monitor are installed, will the monitoring periods be changed to a time when oil field activities are at full force?
- (3) Since the number of oil wells will be increased each year for the next 20 years, will any oil field emissions reported in the one-year study be extrapolated in order to reflect concentrations in future years? In the next 5 years? In the next 2 years?

Thank you,
Catherine Cottles



4209 Jackson Avenue
Culver City, CA 90232
August 31, 2012

AMWP Comments

Rena Kambara
Planner
Zoning Enforcement West Section
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

Dear Ms. Kambara,

These comments submitted by the Citizens Coalition for a Safe Community are first and foremost to express our disappointment in the Work Plans limited scope of specific monitoring durations.

Given the variable nature of PXP's annual oil field new and rework drilling operations along with their day to day processing operations of which we have seen multiple failures over the past few years in no common sense way can we see this Work Plan meeting the criteria as detailed in RFP as being,

Primary objectives:

- Quantify the air toxics emissions from the Inglewood Oil Field (referred to as Oil Field throughout this document) operations including drilling and well workovers.
 - Assess the health risk of both acute and chronic exposure to air toxics emissions from Oil Field operations.
 -

Secondary objectives:

- To the extent feasible, determine and distinguish the major sources of toxic air emission within the areas surrounding the Oil Field.
 - To the extent feasible, assess the Oil Field's contribution to the overall acute and chronic health risk in the areas surrounding the Oil Field

without serious compromise.

The constant apologetic references in STI's Draft Work Plan repeatedly note inadequate funding to initiate a study of proper length and imply the results will be flawed and not meet the objectives except through extrapolation of the short duration periods of collected data .

In order for this to be a Air Monitoring Study that will also meet the publics expectations it should have been designed to be a real-time study over the period of at least two years with 24/7 data collection and public access through an internet website to real time measurements similar to the Phillips 66 Rodeo Refinery monitoring. As it is now without 24/7 measurement of H2S and VOC's it is only going to be meet with suspicion by residents in proximity to the fence-line of the field.

Please rethink this Work Plan before it becomes another public disappointment.
Thank you.

Sincerely,

Gary Gless
President
Citizens Coalition for A Safe Community



CAROL A. SCHWAB
City Attorney

OFFICE OF THE CITY ATTORNEY

CITY OF CULVER CITY

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August 31, 2012

VIA EMAIL

Richard Bruckner, Director
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, California 90012

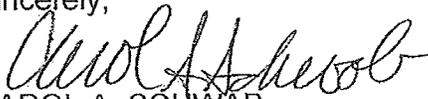
COMMENTS ON STI'S DRAFT BALDWIN HILLS AIR QUALITY STUDY WORK PLAN AND QUALITY CONTROL PLAN

Dear Mr. Bruckner:

The City of Culver City has reviewed the Draft Baldwin Hills Air Quality Study Work Plan and Quality Control Plan dated August 16, 2012. Attached to this letter are our comments. If you have any questions, please contact Sherry Jordan, Senior Planner, at sherry.jordan@culvercity.org.

Thank you for your consideration of our comments.

Sincerely,


CAROL A. SCHWAB
City Attorney
City of Culver City

Attachment: City of Culver City Comments to the Draft Baldwin Hills Air Quality Study Work Plan and Quality Control Plan Dated August 16, 2012

Copy: Mayor Weissman and Members of the City Council, Culver City
John Nachbar, City Manager
Rena Rambara, County of Los Angeles
Karly Katona, Supervisor Mark Ridley-Thomas, LA County
Elaine Lemke, County Counsel, County of Los Angeles
David McNeill, Baldwin Hills Conservancy
Robert Garcia, The City Project
Damon Nagami, Natural Resources Defense Council
Lark Galloway Gilliam, Community Health Councils
Ken Kutcher, Community Health Councils/NRDC

CITY OF CULVER CITY
Comments to the Draft Baldwin Hills Air Quality Study Work Plan
and Quality Control Plan Dated August 16, 2012

The following are comments on the Draft Baldwin Hills Air Quality Study Work Plan and Quality Control Plan ("Plan"):

1. The Plan notes that there are project objectives to assess the health risk from oil field operations. However, the Plan seems to only address the assessment of health risk in the area of the oil field. There is no mention of oil field air toxics quantification methods, methods for determining/distinguishing other toxic air pollutant sources, or the methods by which the oil field's contribution to health risk will be attributed. The Plan must assess exposure in the community. To the extent that the Plan fails to meet objectives due to funding resources, it would be important to understand the resources necessary to meet the objectives.
2. Section 2.1, Table 2.1 only presents the top 13 ranked pollutants; however, concerns exist for other pollutants like reduced sulfur compounds. The lower ranked air toxic pollutants that had relatively high emissions (such as at least 10 or 100 lbs./year or more), such as hydrogen sulfide should also be presented to clarify where they rank relative to the other pollutants and also to see the assumptions, including acute emissions assumptions used to rank those higher emitting pollutants. It is essential, from a community perspective, among other reasons, to include hydrogen sulfide in the monitoring plan. Concerns over hydrogen sulfide releases, and resulting physical complaints, spurred the development of the CSD. As sulfide emissions are also monitored at the drill site, it will provide a good set of data to understand source and attenuation.
3. Section 2.1 provides notes that the reported 2005/2006 annual emissions from the EIR were used to determine the key pollutants that would be studied. There are two potential flaws with this method:
 - a. The annual emissions do not address peak hourly emissions that should have been used for the analysis of acute exposures. Short-term peak emissions should have been used to determine potential acute exposures and rank acute exposure pollutants of concern.
 - b. The representativeness of the 2005/2006 emissions should have been documented. It is unclear if the emissions from these years are representative of the proposed sampling period.
4. Section 2.2 notes that they considered the issue of "the confounding factor of multiple external emissions of pollutants of concern". However, hydrogen sulfide would have been a pollutant with reduced external emissions sources that could have been used to better address this issue. To be able to attribute impacts from the oil field you need to key on a particular pollutant, but this plan doesn't seem to

address what pollutant will key attribution. So, the adequacy of the consideration of this confounding issue is questionable.

5. The four proposed sampling sites are all within the oil field property, but the furthest two from Culver City (south and east) are the ones that will use the greatest number of sampling equipment, including the meteorological tower. Therefore, the quality of the data obtained will be highest the south and east sides of the oil field, the furthest away from Culver City.
6. The siting of the monitoring sites doesn't seem to have considered the oil field operations. They seemed to default to a cardinal direction approach prior to a more thorough analysis of the intensity/geography of the oil field emissions and wind monitoring data. The siting must include consideration of when and where drilling operations will take place as emissions from drill rigs and fugitive emissions from drilling muds, and other down hole sources, are a significant concern. Emissions monitoring should include siting at the downwind boundary of the field when drilling operations are occurring near the borders of the oil field in order to assess potential acute exposure during such circumstances. Consideration must also be given so that such monitoring occurs when drilling is occurring in deep zones (e.g. nodular shale), which is when previous events of significant releases of suspected hydrogen sulfide occurred.
7. The text is hard to follow regarding the understanding of exactly what will be sampled, how often, and for how long at each of the four sampling sites. A table presenting this information would be very useful.
8. Add a table that clearly provides the information of what, how often, and for how long each sampling event will occur at each of the monitoring sites.
9. Provide additional information on all pollutants ranked for inclusion in the monitoring including assumptions on short-term peak emission rates to ensure that potential acute exposures have been adequately considered.
10. Address the onsite geography of the oil field pollutants, including obtaining proposed well drilling locations during the sampling period, to ensure that the sampling locations are adequate.
11. Address all four of the primary and secondary project objectives in the Plan. Particularly identifying:
 - a. How the onsite emissions will be determined during the sampling period.
 - b. How the confounding off-oil field emissions will be determined.
 - c. The methods of determining/attributing how much of the total health risk is a result of the oil field operations.

12. The following SCAQMD comments seem reasonable and should be instituted if possible given funding limitations:

- a. Include Ultra-Fine Particle sampling in the monitoring along with the proposed black carbon monitoring.
- b. Collocating Black Carbon samplers for a day to determine instrument bias.
- c. Add XRF measurements to estimate trace element concentrations.
- d. Change method of verification of PTR-TOFMS sampling, and also sampling in communities surrounding the oil field is recommended.
- e. For passive VOC sampling duration of 24 hours and addition of 10 percent duplicate tests are recommended.
- f. Seasonality of monitoring - summer/winter would be preferred over spring/fall.
- g. Include operations monitoring to help interpret air quality monitoring data.



August 31, 2012

Richard Bruckner, Director
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Attention: Rena Kambara via rkambara@planning.lacounty.gov

Subject: Baldwin Hills Air Quality Monitoring Study Comments

Dear Mr. Bruckner;

We take this opportunity to comment on the draft Baldwin Hills Air Quality Monitoring Study commissioned by the department pursuant to the terms of the July 2011 settlement agreement. We have reviewed the draft with the assistance of a qualified consultant who has prepared and conducted numerous air quality assessments. We question (1) the reliance upon the emission data presented in the 2008 Environmental Impact Review, (2) compromises made on the scope of the study as a result insufficient funding for the project, (3) the absence of a toxicological examination of the cumulative effects of the individually identified toxins and (4) the lack of a written agreement with PXP to assure that they will provide their operations data to (and share their annual workplan scheduling cooperatively with) the consultant. We strongly urge the County to re-visit the workplan based on the following comments and recommendations:

Lack of Independent Verification of Emission Data: STI indicates it "used the reported emissions from 2005 and 2006 used in the Baldwin Hills Community Standards District EIR". The EIR air quality data relied on the AQMD's West LA monitoring station located at least 2.54 miles north and the Lennox Station located about 4.2 miles south of the oil field. (FEIR at p. 4.2-3.) In addition to its reliance on those non-adjacent stations, the EIR air quality analysis also relied on PXP's annual emissions reports for fiscal years July 2005 and June 2006 (FEIR at p. 4.2-9), which are already more than five years old and are not independently verifiable.

This data used in the EIR has now informed the fundamental design and scope of the proposed study. The sampling and reliance on secondary data sources was questioned during the CEQA public review process and again in the August 15, 2012 letter from the South Coast Air Quality Management District (AQMD) in its comments on the study design. For example, AQMD notes that "ultrafine particles (UFPs) emissions were not accounted for in the Baldwin hills Community Standards District EIR...but are likely to be elevated within and around the study area." This is of particular concern given the assertion that exposure to UFPs has been linked to respiratory and cardiovascular diseases as indicated by Dr. Cyrus

Rangan author of the County Health Assessment in a July 2012 CAP meeting. The February 2011, LA County Department of Public Health Inglewood Oil Field Communities Health Assessment found, higher age-adjusted mortality rates in the Inglewood Oil Field communities compared to Los Angeles County for asthma (2.5 in Inglewood Oil Field Communities vs 1.4 LA County) and coronary heart disease (196.2 vs 187.6 in LA County).

Furthermore, operations since the release of EIR have significantly been changed due to increased oil field activity and presence of new technologies, including hydraulic fracturing, that are now known to be taking place throughout the field. STI nonetheless relies upon this data to rank and prioritize the pollutants to be studied and therefore the methodology. The reliance on this data undermines the fundamental credibility and integrity of the study.

Compromises Made in Scope of Study: As noted in the draft, "Due to budgetary constraints, STI was forced to prioritize the pollutants for which monitoring could take place at high temporal resolution and to propose less than a full year of monitoring for some toxics." This approach does not provide the public with the assurance or scientific certainty of the pollutants and toxins in the field. The lack of funding compromises the integrity of the study by forcing constraints on:

- a. Capacity and pollutants to be captured and measured
- b. Length of time and seasonal variations for which critical toxins are captured and studied as noted in the AQMD comment letter
- c. Identification and measurement of fugitive gases and soil vapors independent of current drilling operation resulting from spillage and leaks in abandoned wells

We question if the proposed two week period for monitoring VOCs will provide sufficient data on what is occurring in the field over time. The study does not demonstrate the time period proposed is based on any particular conditions. Furthermore -while the scientific evidence regarding the health impact of various toxins may be inconclusive at this time – gathering this data at this point can be beneficial as the science catches up with the new technology used for drilling and oil extraction. It seems short-sighted to simply omit these compounds from the study.

Lack of Toxicological Examination: The study examines the presence of the individual pollutants but fails to examine the potential chemical reaction and health risk when two or more of the pollutants are combined. The presence of any of the individual compounds in the quantities identified in the EIR may or may not present a health risk. However, the EIR failed to and now the proposed study does not appear to examine the cumulative effects of how a combination of chemicals at various concentration levels may attach to particulates and pose a health risk. It is not clear if any member of the study's team is qualified to conduct this aspect of the study and address this unanswered question.

No Written Agreement to Give Air Quality Consultant Access to PXP Operation's Data: According to STI, "Of critical importance to fully addressing the study objectives is the documentation of time/location activity information for major Oil Field operations. Topping this list of activities are well drilling and well work-overs." Yet, to date STI has received only inadequate verbal commitments from PXP to set up a mechanism for sharing operation schedules and data. Without this information, STI will be unable to meet the primary and secondary objectives of the study.

Recommendations - we offer the following recommendations to strengthen the utility of the study:

1. Divide the study into two phases and **revise the current workplan to establish an independent, comprehensive and scientifically based baseline**. The baseline study should not assume the absence of any toxins or levels of concentration, but rather be designed to identify as many of the pollutants and toxins present in the field as scientifically feasible.
2. The **study should also include a toxicological analysis** of the data.
3. Design the second phase of the study to **examine the correlation between emissions and the various activities in the field**. Require PXP to agree to provide data on their schedule of activities in the oil field in writing and design the collection of data to correspond with the various aspects and levels of each operation. The information-sharing from PXP should include but not be limited to the nature of the operation, duration, output, quantity of material injected into the well, readings from the monitoring devices at the well head, etc.
4. **Perform the supplemental recommendations outlined in the AQMD comment letter**.
5. **Seek funding from PXP to complete the second phase** of the study as described above, including monitoring for PM .1. PXP has continued to assert their activities and the oil drilling operation are safe. Underwriting an independent empirical study would assess the accuracy of that assertion and they should therefore be asked to provide the needed additional funding.
6. **Black Carbon monitoring should specify monitoring for both PM 1.0 and PM 2.5** using the same methods used to measure the background levels for BC.
7. **Make public all written comments submitted** to the County, and include CAP in all consolidation and prioritization of public comments.
8. **Make public all data collected** to support additional research and analysis.

Thank you in advance for your response to the questions raised and your consideration of these recommendations. The goal is to provide the public with the highest level of confidence that the County is effectively monitoring and protecting the public's health and safety. We believe these recommendations for revising the workplan are a step in that direction.

Sincerely,



Lark Galloway-Gilliam, MPA
Executive Director
Community Health Councils



Damon K. Nagami
Staff Attorney
Natural Resources Defense Council

CC: Supervisor Mark Ridley-Thomas
Senator Curren Price
Assemblymember Holly Mitchell