



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

November 16, 2016

TO: Supervisor Hilda L. Solis, Chair
Supervisor Mark Ridley-Thomas
Supervisor Sheila Kuehl
Supervisor Don Knabe
Supervisor Michael D. Antonovich

FROM: Susana Franco-Rogan
Supervisor, Zoning Enforcement West

TS (for)

**ADVISORY PANEL REPORT ON BOARD MOTION REGARDING THE OIL AND GAS
STRIKE TEAM FOR UNINCORPORATED LOS ANGELES COUNTY (MARCH 29, 2016
– AGENDA ITEM NO. 12)**

On March 29, 2016, the Los Angeles County Board of Supervisors (Board) passed a motion instructing the Director of Regional Planning, in coordination with the Fire Chief, Interim Director of the Department of Public Health, and Director of the Department of Public Works to convene a Strike Team to assess the conditions, regulatory compliance and potential public health and safety risk associated with existing oil and gas facilities in unincorporated Los Angeles County. The Board instructed the Strike Team to report back on a biannual basis with a summary of its findings and any recommendations on legislative and regulatory positions that the Board should consider. The Strike Team's first biannual report was submitted to the Board on October 17, 2016.

The Board also requested that a five member Advisory Panel be established, comprised of one appointee from each Supervisor with an expertise in oil and gas exploration and production to work in conjunction with the Strike Team in order to assess the team's findings and recommendations, and provide a report to the Board on this assessment no later than 30 days after the Strike Team's report is submitted to the Board. This report addresses the Advisory Panel's assessment of the Strike Team's first biannual report.

The Advisory Panel held a public meeting on November 9, 2016, to discuss their draft comments on the first Strike Team biannual report and provided final written comments following the meeting. This report includes the written comments from the Advisory Panel member from the First, Second, Third, and Fourth Supervisorial Districts. Written comments have not been received from the Advisory Panel member from the Fifth Supervisorial District. The Advisory Panel report can also be accessed on the Department's web page at planning.lacounty.gov/oil-gas/strike.

This is the first of three Advisory Panel reports that will be provided to the Board during the 18-month long Strike Team effort. The next Oil and Gas Strike Team report is due on March 29, 2017, and the Advisory Panel report will follow no later than 30 days after that date. Should you have any questions about this report, please contact Timothy Stapleton, Zoning Enforcement – West Area Section, at tstapleton@planning.lacounty.gov or (213) 974-6453.

RJB:JS:SFR:TS

Attachment: planning.lacounty.gov/assets/upl/project/oil-gas_advisory-panel_20161116-report.pdf

c: Executive Office, Board of Supervisors
Chief Executive Office
County Counsel
Fire Department
Department of Public Health
Department of Public Works

LUR_11-16-2016-MBS_GAS_OIL_STRIKE_ADVISORY_REPORT_1

FIRST DISTRICT
ADVISORY PANEL MEMBER
JULIA MAY
COMMENTS

Initial Recommendations of Julia May, First District representative, Advisory Panel of LA County Oil & Gas taskforce, regarding Draft First Report, 11/7/2016

- *Subject to additional discussion and comments during Advisory Panel on 11/8/2016*

1. **I appreciate the important work of the staff and consultants, and the Board of Supervisors** in beginning this crucial process to protect health, safety, and the environment related to Oil and Gas operations in Los Angeles County, and for the first draft report.
2. **I agree with the comments submitted by Tim O'Connor, Third District, yesterday, regarding the need to take additional steps,** evaluate air and odor impacts, community history, views, and complaints, well stimulation and chemical use, and to expand inspection and maintenance requirements, breakdown prevention, and air monitoring.
3. **I submitted a letter to staff in September (before the County draft staff report was produced) regarding the poor environmental and health conditions surrounding oil & gas extraction facilities in the Los Angeles region,** the inadequacies of public nuisance reporting systems, and including a long list of chemicals reported by oil and gas operators pursuant to SCAQMD Regulation 1148.2, as being used locally. I recommended that there was already overwhelming evidence that oil and gas extraction is incompatible with residential areas and sensitive receptors, and should not be permitted. This letter also included information on the work and recommendations of STAND LA community organizations regarding oil and gas extraction. This letter was forwarded to the Advisory Panel on Monday by staff.
4. **Since then, the City of Los Angeles has adopted new and improved procedures for undertaking environmental review pursuant to CEQA upon receiving Oil and Gas extraction applications,** including requiring formal Health Impact Assessments. The County should review these procedures for incorporation as recommended below, but should consider these as the bare minimum baseline, and develop land use policies addressing where, to what extent, and how drilling may occur in unincorporated areas.
5. **Preliminary Recommendations: Add a Next Steps section to the First Draft report, for submittal to Supervisors including (but not necessarily limited to) these commitments:**
 - a. Evaluate feasibility of a 1500 ft. setback zone requirement for oil and gas extraction
 - b. Interview community members living near oil and gas extraction facilities for comment about the community experience.
 - c. Evaluate removing "by right" permitting, and incorporating discretionary permitting.
 - d. Evaluate incorporation of recently adopted City of LA procedures for environmental review and health impact assessment.
 - e. Evaluate banning extremely hazardous substance transport through residential areas for use at oil & gas facilities, including Hydrogen Fluoride, and potentially other hazardous chemicals.
 - f. Evaluate a requirement for an Odor Prevention Plan for all oil and gas extraction (which would also generally reduce emissions), and streamlined public nuisance reporting procedures to reduce barriers to public reporting.
 - g. Evaluate methods for monitoring air emissions.
 - h. Evaluate Best Available Control Technologies & improved inspection/maintenance.

9/20/2016

Susana Franco-Rogan
Supervising Regional Planner
County of Los Angeles

Re: Key issues Staff should consider in developing its evaluation and recommendations on Oil & Gas facilities

Dear Ms. Franco-Rogan,

This is to follow up on the discussion during the August 31, 2016 meeting of the Advisory Panel of the Los Angeles County task force on Oil and Gas facilities. I appreciate very much the work of the staff and County Supervisors to evaluate these important health and environmental issues, and being invited to provide input as part of the Advisory Panel. The County evaluation is an unusual and important opportunity, that can also provide a model other regions could replicate. I include an initial set of information and recommendations, which I will supplement during the normal course of the Advisory Panel recommendation process.

As a Senior Scientist at Communities for a Better Environment (CBE), I have witnessed many community members' complaints about extraction facility impacts in LA County, including:

- Severe smells,
- Asthma attacks during heavy site activities,
- Drilling site flaring (found by the AQMD to be illegally burning 24 hours/day, and with gas flow well above permit limits),
- Unpermitted activities,
- Oil eruptions that sprayed oil onto nearby houses, cars, streets, and residents
- Cracking foundations after drilling operations,
- Illegal routing of diesel trucks through neighborhoods to carry oil from drilling sites,
- Extraction workers operating in full protective gear within a dozen feet of apartment windows (without warning to neighbors),
- Plants that have been confirmed by a plant pathologist to have died from chemical exposure,
- Extreme noise keeping neighbors and children awake,
- Drill-site dust blowing onto homes,
- Lack of information for neighbors about the equipment and chemicals used by extraction facilities and their activities,
- Lack of a meaningful public review process,
- Lack of advance notification regarding drilling activities,
- Descriptions by neighbors of extraction activities severely impacting quality of life.

The overall oil and gas industry is heavily concentrated in communities of color and low income communities. While the areas where I have witnessed impacts (including Wilmington) are not in unincorporated Los Angeles County, the lessons learned apply to extraction in general and should be considered in the County investigation. I would also urge the County to do everything it can to report on the entire county rather than only unincorporated areas.

As staff are preparing a report to the Supervisors on these issues, I wanted to provide documents from community organizations and community members describing extraction impacts and recommendations. This is the tip of the iceberg in terms of documentation on impacts, but provides important local information. I am equally sure the County staff and consultants have gathered substantial data and documentation that I am looking forward to seeing when the staff report is published. The attachments to this letter include the following (also described further later in this letter):

- Three letters submitted by the coalition of neighborhood organizations and Environmental Justice advocates called STAND LA (Stand Together Against Neighborhood Drilling – Los Angeles) with recommendations on AQMD regulations, and in support of Aliso Canyon neighbors,
- A letter to the California Air Resources Board regarding state Oil and Gas regulations by another set of Environmental Justice and public health advocates.
- Surveys of neighbors living near one drilling operation, who describe multiple severe impacts (carried out by CBE in 2009).
- I am also including an excerpt from a CBE report regarding public health conditions and permitting deficiencies regarding the Warren E&P site in Wilmington as of April 2009.

I understand the County already has a copy of the report - *Drilling Down: The Community Consequences of Expanded Oil Development in L.A.*, documenting impacts at multiple extraction sites that was developed in concert with community organizations.¹ The County should also be aware of a report by CHC (Community Health Councils),² *Oil Drilling in Los Angeles, A Story of Unequal Protections*, which compared extraction on the West side to South LA, and concluded that while there is a city-wide risk, communities of color are at higher risk from extraction operations:

Whenever oil and gas is produced near homes, schools, daycare centers, and other sensitive population centers, residents are put at risk. With 17 sites across the City of Los Angeles operating hazardously close (within 1,500 feet) to these kinds of sensitive population centers, oil and gas operations present a significant citywide risk to public health that decision-makers have failed to effectively address. Although oil and gas production occurs citywide, the relative risk is significantly higher in lower-income communities of color.

¹ 2015, Liberty Hill,

https://www.libertyhill.org/sites/libertyhillfoundation/files/Drilling%20Down%20Report_1.pdf

² January 2015, at p. 16, available at: <http://www.climateaccess.org/sites/default/files/CHC-Issue-Brief-Oil-Drilling-In-Los-Angeles.pdf>

It is important for staff to be aware as well of gaps in data and regulatory structures, such as flaws in the public nuisance reporting process. These flaws cause neighbors' complaints to be inherently underestimated by agencies such as the AQMD (although in fact this is a statewide problem). While the AQMD has made efforts to improve this process, it takes time for inspectors to travel to extraction sites, and the source of smells must be confirmed. The AQMD continues to require multiple calls and confirmation before stepped up pollution prevention mechanisms are required, despite neighbors urging a more streamlined and useable process. Neighbors who take the time to call inspectors and meet them but then see no improvements give up reporting. Furthermore, when nuisances occur at night, neighbors do not want to further disturb sleep by calling or meeting an inspector. Thus having a flawed public nuisance reporting system and unduly relying on this as a main enforcement mechanism to prevent odorous air emissions has resulted in entrenched, ongoing impacts.

It is also very important for the County to talk directly with neighbors of extraction sites, to understand these conditions. Some facilities appear to operate better than others, but none are appropriately cited in residential areas.

It is most important to recognize that drilling and extraction facilities are inherently incompatible with residential neighborhoods. Since drilling operations now have options for lateral drilling, rather than requiring vertical drilling, many sites could be removed away from households, and no new siting near houses should be allowed.

A rigorous identification of Best Available Control Technology (BACT) must also be carried out. The current regulatory structure in place is primitive at best, in terms of mitigating environmental harms to neighboring communities. The AQMD is in the process of evaluating BACT. Also see discussion in the attached letters, which include strong recommendations for specific BACT analysis, including enclosures, tight leak standards, and more.

Monitoring of extraction sites is also a key solution that neighbors are urging. While monitoring chemicals is specialized, with no one technique covering all chemicals, standard methods are available for sampling and continuous monitoring of hydrocarbons and other Volatile Organic Compounds, sulfur compounds, and other chemicals. (Sulfur compounds such as Hydrogen Sulfide are difficult to monitor, since people can smell them below detection limits, but nevertheless options are available.). Particulate matter monitoring uses other readily available equipment. Plate sampling and wipe sampling can be used to identify oil droplets deposited on homes. High-tech and innovative remote sensing using infrared or ultraviolet beams can be used for many different chemicals but also requires care to enable detection of different chemicals at different wavelengths, taking into account chemical interference. Noise monitoring is another important need near some extraction facilities. Video monitoring can also be helpful in certain cases (e.g. this is in use at oil refineries to identify smoking flares and to supplement flare gas flow and chemical monitoring).

Regardless of the need for care and quality assurance, there is a wide and readily available body of knowledge on monitoring oil and gas related industry, and a major need for setting such

monitoring in place. The AQMD is in the process of evaluating best monitoring for extraction facilities, at the urging of STAND LA. The County should also request sharing this information.

Community-based monitoring efforts of neighbors near oil refineries can serve as examples for evaluating the same hydrocarbons, sulfur compounds, and other chemicals generally present at oil and gas extraction facilities. Neighbors have utilized “Bucket Brigades” using low-tech but effective canister-like devices supported by EPA approved Quality Assurance plans, with samples processed at laboratories. These require training, support, and funding for lab analysis. (CBE developed the original Bucket Brigades in Northern California and has training materials available, but many organizations have since used buckets around the country and even internationally.) Refinery neighbors have also negotiated Good Neighbor Agreements, setting in place high-tech remote infrared and ultraviolet monitoring. The wide range of monitoring options available should include not only a preference for continuous monitoring by regulators and industry, but also for institutional support of community-based monitoring.

Chemicals reported through the recent AQMD regulations identify severely hazardous chemicals used in neighborhood drilling sites that should not be permitted. I understand that the staff and consultants have contacted the AQMD regarding odor complaint data. The AQMD should also provide the County its reported data on the chemicals reported pursuant to AQMD Rules 1148.1 and 1148.2 if it has not done so already. These chemicals have potential impacts on neighbors at the sites, and during transportation to the sites from other areas. The long list includes many hazardous materials, most notably the extremely hazardous chemical hydrofluoric acid, which should be entirely banned.

Additionally, they include many carcinogenic and otherwise toxic chemicals such as benzene, toluene, xylenes, Polycyclic Aromatic Hydrocarbons (PAHs), naphthas, formaldehyde, and others. Chemicals like 2-butoxyethanol and nonylphenol ethoxylate are also used, with medical literature identifying reproductive and endocrine disrupting characteristics of these chemicals. Community investigations are ongoing as well, regarding the use of endocrine disrupting chemicals to mask odorous hydrogen sulfide (H₂S).

The list of chemicals reported also includes silica sand, which OSHA documented in a Health Hazard Alert as a health risk of certain extraction activities.³ This brings up two issues – one, that workers’ potential health impacts should also be identified by the County, supplementing OSHA’s actions. Further, with neighbors so close to extraction operations, information about worker exposure may assist the County in identifying neighborhood exposures. For example, a NIOSH fact sheet describes the study: NIOSH Field Effort to Assess Chemical Exposure Risks to Gas and Oil Workers, which may yield useful information about chemicals emitted into neighborhoods.⁴

Many chemicals are reported as “trade secret,” with only family name identified. Some of these are clearly toxic (for instance PAHs), others raise questions, for example “Wood Chemicals.”

³ An OSHA Alert warned of worker exposure to silica sand during extraction activities. Silica sand can be small enough to enter deep into lungs:

https://www.osha.gov/dts/hazardalerts/hydraulic_frac_hazard_alert.html

⁴ <http://www.cdc.gov/niosh/docs/2010-130/pdfs/2010-130.pdf>

The category of wood chemicals in other circumstances includes the toxics pentachlorophenol, creosote,⁵ and arsenic,⁶ but the public is not provided with the chemical names for Trade Secret chemicals.

Before the AQMD regulations were adopted, the public had little or no information about these chemicals used locally in extraction, so access to the AQMD data has provided a key step forward, although it is only a first step. The resultant list is surprising and alarming due to the list length, toxicity, lack of regulation, lack of best engineering practices, secrecy, and because there is little or no warning to neighbors. By contrast, in other industries, reporting chemical use has long been standard.

The County, on the other hand, should be able to receive the data on the specific chemicals used, and evaluate potential health impacts and accident hazards, in order to protect public health. In general, there has been a broad public outcry and widespread dissatisfaction that the extraction industry is allowed to hide toxic chemical use behind “trade secret” status, when it has long been standard for other industries to publicly report chemical usage, to protect health and safety.

The list of chemicals reported to the AQMD for Wilmington extraction facilities pursuant to AQMD regulations during well drilling, well completion, rework, gravel packing, acidizing and maintenance acidizing, include the following specific chemicals, and following family names (for those ingredients identified as trade secret):

Specific Chemicals as Reported:

- 1,2,4-Trimethylbenzene,
- 2-Butoxy Ethanol,
- 2-Hydroxy-1,2,3-Propanetricarboxylic Acid,
- 2-Propyn-1-OL,
- Acetic Acid Ethyl Ester-Polymer with Ethenol,
- Acetone,
- Acrylic Polymer,
- Alkylbenzene Mixture,
- Alumina,
- Aluminum,
- Aluminum Oxide,
- Ammonium Chloride,
- Amorphous Silica,
- Amorphous Silica Fume,
- Anionic Acylamide Copolymer,
- Aromatic Barite,
- Barium Sulfate,
- Bentonite,
- Calcium Bromide,
- Calcium Carbonate,
- Calcium Chloride,
- Calcium Oxide,
- Carbon,
- Carboxy methylcellulose Sodium Salt,
- Cellophane,
- Cellulose,
- Citric Acid,
- Citrus Terpenes,
- Crystalline Silica,
- Cumene,
- Cylohexanamine-Sulfate (1:1),
- Diisoproylnaphthalene,
- Disodium Metasilicate,
- Erythorbic Acid,
- Ethylbenzene,
- Ethylene Glycol Monobutyl Ether,
- Ethyl Octynol,
- Ferrous Sulfate,
- Formaldehyde,
- Glutaral,
- Glycolic Acid,
- Glyoxal,
- Gypsum,

⁵ <http://kmgchemicals.com/our-businesses/wood-treating-chemicals/>

⁶ <http://woodtreatment.sustainablesources.com/>

- Heavy Aromatic Naphtha,
- Hydrochloric Acid (Hydrogen Chloride),
- Hydroxyacetic Acid,
- **Hydrogen Fluoride,**
- Iron Oxide (Fe₂O₃),
- Isoquinoline,
- Light Aromatic Naphtha,
- Magnesium,
- Magnesium Oxide,
- Methanol,
- Methyl Amyl Alcohol,
- Methyl Ester of Sulfonated Tannin,
- Mica,
- Mineral Fiber,
- Naphthalene,
- Nitrilotriacetic Acid,
- Oxyalkylated Amine Quat,
- Oxyalkylated Alkylphenol and Resin,
- Petroleum Naphtha,
- Petroleum Resins,
- Phosphoric Acid,
- Pine Oil,
- Polymer,
- Portland Cement,
- Potassium Chloride,
- Potassium Oxide,
- Propargyl Alcohol,
- Proprietary,
- Propyn-1-ol,
- Quartz (SiO₂),
- Quinoline,
- Quinaldine,
- Saponite,
- Silica,
- Silica Crystalline Quartz,
- Sodium Bicarbonate,
- Sodium Carbonate,
- Sodium Chloride,
- Sodium Gluconate,
- Sodium Lignosulfate,
- Solvent Naphtha (Petroleum) – Heavy Aromatic,
- Stearic Acid,
- Sulfonate,
- Synthetic Red Iron Oxide,
- Terpene Hydrocarbon,
- Thiourea Polymer,
- Toluene,

- Welan Gum,
- Wood Dust-Soft Wood,
- Xanthan Gum,
- Xylene.

“Trade Secrets” Chemicals’ Family Names Reported:

- Acetic Acid,
- Aldehyde,
- Aliphatic Alcohol, (1), (2), (3),
- Alkylaryl Amine Sulfonate,
- Alkylaryl Sulfonates,
- Alkyl Benzenesulfonic Acid,
- Alkyne Alcohol,
- Amide Surfactant,
- Amide Surfactant Phosphate Acid Salt,
- Amide Surfactant Phosphate Ester Salt,
- Aromatic Amine TOFA Salt,
- Aromatic Amines,
- Aromatic Compound,
- Aromatic Hydrocarbons,
- Aromatic Petroleum Distillates,
- Aromatic Amines,
- Aromatic Amine - TOFA Salt,
- Aromatic Compound (1), (2), (3), (4), (5), (6),
- Cinnamic Inhibitor,
- Copolymer,
- Crosslinked Polyol Ester,
- Detergent,
- D-Limonene,
- Diol Compound,
- Ester,
- Ester,
- Fatty Acid,
- Fatty Acid Esters,
- Halides-Inorganic Salt,
- Halides,
- Inorganic Compound,
- Inorganic Potassium Compound / Alkali Hydroxide,
- Inorganic Salt of an Acid,
- Inorganic Solvent,
- Ionic Surfactants,
- Ketone,
- Linear Alkylbenzene,
- Lubricant, Mixture,
- Modified Starch,
- Modified Sulfonate,
- Modified Thiourea Polymer,

“Trade Secrets” Family Names continued:

- Naphthalenesulfonate-Formaldehyde Condensate – Sodium Salt,
- Non-hazardous ingredients,
- Nonylphenol Ethoxylate,
- Modified Sulfonate,
- Modified Thiourea Polymer,
- Naphthalene Sulfonate-Formaldehyde Condensate,
- Non-hazardous ingredients,
- Nonylphenol Ethoxylate,
- Olefin,
- Organosulfur Compound (1), (2),
- Organophosphonic Acid Salt,
- Oxyalkylated Alkylphenol,
- Oxyalkylated Alkylphenol Resin,
- Oxyalkylated Amin Quat,
- Oxyalkylated Polyamine,
- Petroleum Resins,
- Polycyclic Compound,
- Polyglycol Ester,
- Polyoxylalkylenes,
- Polysaccharide,
- Phosphonate Salt,
- Polyacrylate,
- Polycyclic Aromatic Hydrocarbon,
- Polycyclic Compound,
- Polyester,
- Polyoxylalkylenes,
- Polysaccharide,
- Powervis,
- Proprietary Blend,
- Quaternary Ammonium Compound (1), (2), (3),
- Salt Compound,
- Salt of Inorganic Acid,
- Salt of Organic Acid,
- Sulfur Compound,
- Thrutrol,
- Unsaturated Alcohol,
- Vegetable and Polymer Fibers,
- Viscosifier,
- Wood Chemicals

➔ Considering the surprisingly long list of chemicals used, **a requirement for facilities to perform a Hazards Analyses is needed.**

➔ It would also be very important to **determine whether some facilities used less toxic chemicals, that may set standards other facilities should meet.**

Other areas of concern include but are not limited to evaluation of contamination of soil and water due to use of hazardous chemicals, evaluation of the volumes of water used and produced from wells, the risks during earthquakes including fires, spills, chemical hazards, the risks from bulk natural gas storage facilities in light of the Aliso Canyon disaster discussed in the letter below, and the risks from pipelines connected with extraction facilities.

Please see the details of three attached comments by STAND LA to the AQMD, including the February 2015 letter entitled *Comments on draft Rule 1148.1*, and the July 2015 letter entitled *Rule 1148.2- Notification for Oil & Gas Wells Urgently Needs Board Improvements*, and the January 2016 letter entitled *Case No. 137-76, Porter Ranch Gas Leak – Support neighbors, take immediate action.*

The first two letters urge implementation of Best Available Control Technology (BACT), better monitoring, removing some of the barriers present in reporting public nuisances, an Odor Mitigation plan for every extraction facility, better neighbor notification of drilling activities, a Hazards Analysis regarding chemicals used, making all chemicals and other information publicly available, removing exemptions for injection wells, and more. Note that the AQMD is in the

process of evaluating BACT for extraction facilities at the urging of STAND LA. The County should request such evaluations from the AQMD. However, it should also be noted that AQMD regulations allow extraction facilities to operate with far less than best technologies, and this industry has previously been under-regulated. While the AQMD has made important improvements in recent regulations, this process is not complete, and the AQMD has promised neighbors that more work will be done on pollution prevention.

The last STAND LA letter is in support of neighbors and public health impacts of the Aliso Canyon major gas leaks, and discusses the extreme greenhouse emissions from that leak.

Please also see the attached comments of Environmental Justice organizations on the California Air Resources Board Oil and Gas regulation. This comment discusses the specific leak rates and need for tight leak standards as in the Bay Area Air Quality Management District rules, the need for frequent inspection and rule enforcement, requiring BACT, buffer zones, annual public reporting, and more.

In addition, see attached surveys of many Wilmington neighbors showing their experience with the Warren E&P facility 2009, after Warren purchased the site from Exxon, where operations had previously been reduced over years to very low or no activity. After the Warren purchase, Warren began drilling hundreds of wells from this central neighborhood location using lateral drilling. Neighbors contacted CBE, described the conditions as “A Living Hell,” and described frequent diesel truck trips through the neighborhood, loud noises at night, flaring, breathing problems, continuous odors, poor notification, and general strong dissatisfaction with having this facility so near to their houses (across a residential street from homes).

Note that this year it has been reported that Warren E&P has filed for bankruptcy,⁷ which cuts two ways – many neighbors wanted this facility moved out of the neighborhood years ago. However, the bankruptcy brings up questions about the company’s financial ability to clean up the site if it shuts down, or whether it will simply be sold to another operator.

One lesson is that regulators failed to provide sufficient environmental analysis when this site changed hands about a decade ago, (when Warren purchased the facility from Exxon, and greatly expanded operations). **In general, when new or modified operations are proposed or when facilities change hands, thorough environmental review is necessary including environmental impact reports, health impacts analysis, and hazards analysis.**

L.A. County should also consider requiring a company to keep minimum financial assets aside to ensure they can remediate oil fields upon completion of the wells. This type of asset minimum is required of companies operating hazardous facilities under the Resource Conservation and Recovery Act,⁸ and should be required of oil field operators, to prevent Los Angeles County from having to pay for oil field remediation after a company declares bankruptcy.

⁷ Warren Resources Files for Bankruptcy, Wiping Out Stockholders, June 2016, <http://marcellusdrilling.com/2016/06/warren-resources-files-for-bankruptcy-wiping-out-stockholders/>

⁸ U.S. Environmental Protection Agency, Financial Assurance Requirements for Hazardous Waste Treatment, Storage and Disposal Facilities, last accessed Sep. 19, 2016.

It is essential that not only a methodical accounting and understanding of these facilities be achieved, but that serious pollution prevention measures be set in place. Oil and gas extraction facilities have operated at a primitive level of pollution controls compared to other heavy industry, and need to catch up with use of best technologies. These facilities also need much better pre-permitting scrutiny and environmental review, and should not be sited near neighbors, as they routinely are now.

Finally, there is a need in general to for a recognition that in light of the State's and Los Angeles' long term Clean Energy goals (including 80% GHG cuts by 2050, and 40% cuts by 2030 required by AB32, SB350, and SB32), as well as the City's 100% renewables goal, these will necessitate a phaseout of fossil fuel industries including oil and gas extraction. The County should include a recognition in its report that at the least, any expansions in oil and gas production are counter to these state goals and must cease. Moreover, a plan is needed to be phase out these facilities completely.

Sincerely,

Julia May
Advisory Panel Member of the Los Angeles County Oil & Gas Taskforce,
and Senior Scientist, Communities for a Better Environment

Attachments



February 6, 2015

Via Electronic Mail

Dairo Moody, Air Quality Specialist
South Coast Air Quality Management District
dmoody@aqmd.gov

Re: Comments on draft Rule 1148.1

We are writing on behalf of Stand Together Against Neighborhood Drilling (STAND LA), a coalition of community-based environmental health and justice groups impacted by oil drilling operations in the Los Angeles region and public health advocates. We appreciate your efforts to strengthen Rule 1148.1. We strongly support broadening the rule coverage beyond volatile organic compounds and inclusion of other toxic air contaminants, total organic compounds, and odors. We also appreciate the increase in the distance from the facility up to 1,500 feet for the sensitive receptor definition. However, the modifications in the current draft rule are not sufficiently protective to address many of the issues that community members have raised and significant health problems occurring in the community due to drilling operations. We propose to modify the new draft regulation to include language on the following issues:

- **Require expanded impact and mitigation plan and air monitoring for all drilling facilities, including:**
 - **An Odor Mitigation Plan for all facilities**, regardless of whether they have received confirmed odor complaints. Odor Mitigation Plans should be done on a preventive basis rather than after problems have occurred. This is an important consideration because odor complaints have proven very difficult or impossible for the District to confirm on a regular basis due to inherent limitations of the protocols used. These limitations include: travel time required for inspectors to reach facilities, the need for residents to remain in the area to meet inspectors,

lack of public familiarity on access to public complaints, difficulties in carrying out complaint processes during the night when people are asleep, the number of individuals that must call and complain, and the “burnout factor” when residents try to make complaints that often results in incomplete or no action. This is a statewide problem with odor nuisances near industrial facilities that sets the neighbors up to have the burden of proof rather than requiring facilities that are known to cause odor problems to pro-actively prevent emissions. Additionally, such an odor mitigation plan has the added benefit of reducing overall air emissions if good engineering practices are carried out.

- **AQMD staff need to provide an evaluation of onsite monitoring options** (in public workshops), for VOCs, particulate matter, air toxics, oil deposition, and for other potential emissions as well as setting requirements to put these in place.
- **Operators need to be required to have continuous air quality monitoring of criteria pollutants and toxics.** More detail should be added to the draft rule where it discusses monitoring alarms, and specific monitoring and methods should be required.
- **An Oil Deposition Monitoring and Mitigation plan for all facilities** during initial drilling and during ongoing operation. Many community members living near oil drilling operations have reported deposits of oily residue on their cars, yards, and homes. At one point the AQMD offered to carry out outdoor plate sampling to identify potential deposition of oil residue near the Warren drilling facility in Wilmington, but this was never carried out.
- **A Hazards analysis and risk assessment for any facilities using, storing, and transporting Hydrogen Fluoride and other acutely hazardous materials** during both initial and ongoing drilling operations. This should include not only ongoing risks but also risks of releases during earthquakes, fire, and breakdowns. We are very concerned about the potential for major accidents due to use of acutely hazardous materials such as Hydrogen Fluoride that has been ramped up in recent years.
- **Analysis of diesel truck emissions and other diesel engine emissions** and impacts within 1,500 feet of residences and other sensitive receptors.
- **Analysis of BTEX (Benzene, Toluene, Ethylbenzene, and Xylene) and other carcinogenic emissions** and impacts within 1,500 feet of residences and other sensitive receptors.
- **Make all information publicly available and provide an opportunity for public comments and be responsive to these comments before approval.**
- **The Specific Cause Analysis process needs to be speeded up and made less burdensome to the community when odors do occur.** The Odor Mitigation Plan to prevent odors should be updated to address any reported odors that occur (whether confirmed or unconfirmed).

- **Require operators to update standard operating procedures,** emergency or leak prevention plans, or preventative maintenance scheduling and procedures when odors occur. The current draft rule only requires that operators *consider* such changes. AQMD should require operators to adopt changes that are effective in preventing future occurrences of odors.
- **Thresholds should be lowered for confirming odor complaints when they do occur,** including the number of complaints required for a Notice of Violation. This should be done in addition to requiring pro-active Odor Mitigation Plans.
- **Records should be kept for longer – extended to 10 years** – especially since facility operation can wax and wane over time. Some of our community members have been impacted by facilities that were previously shut down and then reopened. Sometimes previously existing permit conditions were disregarded after a number of years. For many reasons, recordkeeping over the long-term is important.
- **Require a phase-in of Best Available Retrofit Control Technology (BARCT) for all oil drilling and Best Available Control Technology (BACT) for new and expanded operations,** by 2017. The District should perform a BACT/BARCT review of best operations and equipment for the purpose of minimizing and eliminating fugitive and point source emissions and best practices for eliminating use of hazardous materials. AQMD should provide this information/evaluation in their staff report during this rulemaking process.
- **Require, at a minimum, the same level of leak detection and repair that is mandated for oil refineries including frequent inspections.** For example, if AQMD identifies a leak, then it is automatically a violation, and it has to be fixed quickly. The way the drilling rule stands now, facilities don't have to fix a leak unless they find it, and that is a disincentive for finding the leak in the first place.
- **Do not allow “standing oil” in well cellars.**
- **Improve fugitive emissions controls beyond simple tarps.** The District should provide an evaluation of more protective fugitive emissions controls to protect against evaporation, including enclosures and engineered fittings.
- **Minimize on-site combustion** as much as possible in concert with eliminating fugitive leaks and venting of gases.
- **Require more transparency in all new and existing drilling operations** – Provide all of the above plans and reports, including all the Impact and Mitigation Plan and air monitoring plans and data, the Specific Cause Analysis reports, and complaint information to the public. Make this information available on your website to avoid lengthy public records requests processes.

In addition to strengthening Rule 1148.1, we strongly urge the District to initiate creating a draft for a new Rule 1148.2 for public comments by March to replace the existing rule 1148.2, which is about to sunset. We appreciate your work on this important rule, and please let us know if you have any questions. We welcome the opportunity to discuss these important community concerns and issues with you in person.

Sincerely,

Julia May
Senior Scientist
Communities for a Better Environment

Angela Johnson Meszaros
General Counsel
Physicians for Social Responsibility – Los Angeles (PSR-LA)

Rev. Kelvin Sauls
Senior Pastor
Holman United Methodist Church

Nancy Halpern Ibrahim, MPH
Executive Director
Esperanza Community Housing Corporation

Sandy Navarro
People Not Pozos
Esperanza Community Housing

D. Malcolm Carson
Policy Director & General Counsel
Community Health Councils

Richard Parks
President
Redeemer Community Partnership

Bhavna Shamasunder
Assistant Professor
**Urban and Environmental Policy Department
Occidental College**

cc. Susan Nakamura, Director of Strategic Initiatives, SNakamura@aqmd.gov

July 18, 2016

California Air Resources Board

1001 I Street

Sacramento, CA 95814

Via Electronic Submittal:

http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=oilandgas2016&comm_period=A

Re: Comments urging strengthening of CARB's Proposed Regulation on Oil & Natural Gas Production, Processing, and Storage

The undersigned environmental health and justice organizations offer comments on the proposed Oil and Natural Gas Production Processing, and Storage (the "Oil & Gas rule") regulation. We appreciate efforts of the California Air Resources Board (CARB) in developing the regulation, and urge the strengthening measures below, to prevent practices leaving communities unprotected.

Our organizations work for Environmental Justice in low-income communities and communities of color heavily impacted by air quality and related public health issues throughout California. We actively participate in local and statewide efforts to prevent and minimize the widespread harms of oil and gas extraction, processing, and storage. Our communities are hard hit by local health impacts of these sources, and are also among the most vulnerable to climate impacts such as heat waves, drought, and increasing smog due to temperature increases. The proposed rule focuses on reduction of the greenhouse gas (GHG) methane, but also identifies sorely needed benefits due to cuts in smog precursor and toxic co-pollutants, since multiple pollutants are emitted simultaneously by these industries. Co-pollutants include toxic BTEX compounds (Benzene, Toluene, Ethylbenzene, and Xylene), other VOCs, hydrogen sulfide, and other pollutants that burden our communities.

The extraction industry has long enjoyed lax or non-existent regulation and primitive control systems as compared to industries such as refining. In many cases, facilities are inherently badly sited, should never have been permitted for operation in residential neighborhoods, and receive many public complaints of severe odors and oil eruptions. Methane can also be emitted during these odor "episodes" reported by communities, so cleaning up odors can also clean up GHGs.

Both ongoing and episodic emissions have been poorly quantified and rarely monitored. With "enhanced" drilling to stimulate wells, many of our communities have seen a boom in extraction operations, sometimes within a few feet of their houses. Facilities all but shut down have drastically expanded operation in recent years, and new operations are springing up regularly all over the state. The volume of oil and gas produced is not necessarily a good indicator of emissions and impacts to local communities, which can be heavily impacted even by a small

nearby facility. For all these reasons and to maximize GHGs and co-pollutant cuts, it is essential that at a minimum, CARB require this industry catch up with best practices and technologies for emission prevention required in other heavy industries such as oil refining. While oil refining pollution prevention is far from ideal, extraction-related industries should at least meet the best standards that have been established by air districts for oil refining, which processes the same chemicals.

I. We urge tighter leak standards, consistent with best oil refinery standards, and speeding up implementation

We urge that leak standards in the regulation be tightened to 100 ppm for valves and connectors, 500 ppm for pumps, compressors, and pressure relief devices, and 100 ppm for any other leaking components (including pneumatic devices), to be minimized in 24 hours and repaired within 7 days. This standard has been required by the Bay Area Air Quality Management District (BAAQMD) for oil refineries for decades. Leaks above these levels should be considered a violation, and inspection and enforcement mechanisms should set in place.

We see no reason for treating oil and gas extraction and handling these leak standards differently from oil refining operations, since they process exactly the same chemicals, and since oil and gas handling operations are much less complex than oil refineries, and in many cases can more easily meet the standards. It is well-established that equipment is available for meeting these leak standards for the pollutants involved. Oil refineries within the BAAQMD District must meet these leak standards for many thousands of valves, connectors, and seals. Thus the Oil & Gas extraction and handling industry, which uses far fewer fugitive leak components, should readily be able to meet the standards. By adopting tighter standards for both methane and co-pollutants, CARB will set strong, consistent statewide requirements for GHGs, criteria pollutants, and toxics.

The final leak standards proposed by CARB are as follows (interim standards are even weaker):

Table 10: Repair Time Periods on or after January 1, 2020

Leak Threshold	Repair Time Period
1,000-9,999 ppmv	14 calendar days
10,000-49,999 ppmv	5 calendar days
50,000 ppmv or greater	2 calendar days
Critical Components	Next shutdown or within 12 months

In the Staff Report for the Oil & Gas rule, staff explains the justification for the standards proposed to be based on the most common standards in the state:¹

In the proposed regulation, 1,000 ppmv is the lowest leak threshold defined. Staff chose this threshold to be consistent with the majority of districts with oil and gas LDAR regulations. District regulations vary on the threshold but 1,000 ppmv is the most common across the districts. In addition, staff chose to lower the threshold from 10,000 ppmv after two years to 1,000 ppmv simply to ensure that more leaks are being detected. The thresholds and repair times assure that leaks are repaired once found and that the largest emitting sources are prioritized. The quickest leak repair time period is 2 calendar days for leaks measuring 50,000 ppmv or greater.

While we appreciate tightening from the earlier-proposed 10,000 ppm standard, we do not believe that choosing the standard based on the largest number of Districts is a valid justification. Many of these standards were adopted long ago, and should have been upgraded to meet the best standards in the state. Many of these Districts are smaller, so simply counting them doesn't provide an indicator of their relevance to impacts. **Setting a state-wide standard that meets best practices will ensure that the new rule doesn't follow an arbitrary average, but instead leads the state as a whole forward toward consistent best practices, proven to be readily-available.**

We propose that the leak standard in the proposed Oil & Gas rule be replaced with the following sections from BAAQMD Regulation 8, Rule 18, requiring a leak standard of 100 ppm for valves, and connectors, a 500 ppm standard for pumps, compressors, and pressure relief devices, and 100 ppm for all other devices (including pneumatic devices):²

8-18-301 General: Except for valves, pumps and compressors, connections and pressure relief devices subject to the requirements of Sections 8-18-302, 303, 304, 305 and Bay Area Air Quality Management District December 16, 2015 8-18-6 306, **a person shall not use any equipment that leaks total organic compounds in excess of 100 ppm unless the leak has been discovered by the operator, minimized within 24 hours and repaired within 7 days.**

8-18-302 Valves: Except as provided in Section 8-18-306, **a person shall not use any valve that leaks total organic compounds in excess of 100 ppm** unless one of the following conditions is met: 302.1 If the leak has been discovered by the operator, minimized within 24 hours and repaired within 7 days; or 302.2 If the leak has been discovered by the APCO, the leak must be repaired within 24 hours.

8-18-303 Pumps and Compressors: Except as provided in Section 8-18-306, **a person shall not use any pump or compressor that leaks total organic compounds in excess**

¹ *Staff Report: Initial Statement of Reasons*, (Public Hearing to Consider the Proposed Regulation for Greenhouse Gas Emission Standards for Crude oil and Natural Gas Facilities), Released: May 31, 2016, Scheduled for Consideration: July 21, 2016, at p. 119, available at: <http://www.arb.ca.gov/cc/oil-gas/isor.htm>

² Available at: <http://www.baaqmd.gov/~media/files/planning-and-research/rules-and-regs/reg-08/rg0818.pdf?la=en>

of 500 ppm unless one of the following conditions is met: 303.1 If the leak has been discovered by the operator, minimized within 24 hours and repaired within 7 days; or 303.2 If the leak has been discovered by the APCO, the leak must be repaired within 24 hours.

8-18-304 Connections: Except as provided in Section 8-18-306, a person shall not use any connection that leaks total organic compounds in excess of 100 ppm unless one of the following conditions is met: 304.1 If the leak has been discovered by the operator, minimized within 24 hours and repaired within 7 days; or 304.2 If the leak has been discovered by the APCO, the leak must be repaired within 24 hours.

8-18-305 Pressure Relief Devices: Except as provided in Section 8-18-306, a person shall not use any pressure relief device that leaks total organic compounds in excess of 500 ppm unless the leak has been discovered by the operator, minimized within 24 hours and repaired within 15 days; or if the leak has been discovered by the APCO, minimized within 24 hours and repaired within 7 days.

II. **Deadlines, exemption allowances, monitoring, and enforcement requirements should be tightened**

Again, in an effort to ensure that long-overdue available best practice methods be expeditiously set for all oil & gas extraction, processing, and storage operations, we urge the additional improvements to the regulation:

- **All standards should be met within at longest two years of adoption, rather than post-2020 for final regulation requirements.** Waiting until 2020 to implement the final standards is excessive – facilities which have been leaking and emitting for far too long need to clean up expeditiously to protect public health and the environment, and should be able to meet standards within two years of adoption. If facilities are not leaking or significantly emitting, it should be no problem to meet standards expeditiously.
- **Monitoring step-down to annual inspections should not be allowed, but should continue at least quarterly.** Monitoring practices are an essential part of pollution prevention. Monthly inspections could further increase reductions achieved, but at least quarterly inspections should be required for all components. Continuous monitoring options should be considered. No option to move to annual inspections should be allowed, even if no leaks are detected. This is especially important for the oil & gas production, processing, and storage industry which has previously lacked inspection. Regular inspection should be a basic part of normal business practices.
- **An exemption allowing 12-month leakage for “critical” components is extremely excessive and should be removed, as oil and gas extraction and processing operations can shut down operations much more easily than oil refineries.** The concept of allowing longer leakage for critical or inaccessible components came out of

oil refining regulation. Oil refineries are vastly more complex, and require complicated shutdown procedures. Oil extraction and processing operations are far smaller and less complex, and handle much lower volumes of materials. They can shut down and start up quickly, without the major impacts caused by oil refinery shutdowns. A year-long allowance for so-called “critical” component leakage is extreme, and encourages unnecessary poor practices and chronic health-threatening emissions exposures.

- **The strongest independent Monitoring, Inspection and Enforcement mechanisms should be in place through regulators.** Any leaks or emissions above standards should be defined as a violation of rules, with associated penalties sufficiently harsh to discourage lax operations.
- **Control efficiency at 95% is lower than achievable standards above 99% for vapor recovery.** CARB is well aware of much higher control efficiencies for handling hydrocarbon and sulfur gases. We strongly encourage adoption of best available vapor capture and control, and discourage combustion devices such as flares, especially near communities.
- **Exemptions should generally be removed for lower volume operations, or where lower pollutant concentration are assumed, at least while California gains more site-specific long-term data on this poorly-monitored industry.** Individual operations assumed to have lower emissions as indicated by industry-wide average factors (especially since these factors have been widely questioned in the scientific literature), and that are not monitored onsite, may never be accurately assessed. Smaller operations are not necessarily lower-emitters, and can be especially harmful in close proximity to neighbors. CARB has acknowledged in its staff report that atmospheric monitoring of oil and gas operations have found higher emissions than EPA bottom-up emissions factor assumptions. Given ongoing community complaints about this industry, the proposed Oil & Gas rule could provide a major opportunity to evaluate actual local monitored impacts of all equipment used in all such operations. These operations are not benign, are inherently polluting, and should at minimum meet best practice leak and vapor recovery standards for all equipment.
- **At a minimum, any facility within 1500 feet of a residence should be required to meet tight leak and vapor capture standards, regardless of minimum volume or pollutant concentration thresholds.** It would further be prudent to prohibit such operations near residents, especially since horizontal drilling techniques allow remote access to wells.
- **We request that CARB release an annual report to the legislature with aggregate emissions data from owners and operators collected under this rule and data from CalEnviroScreen,** for the purposes of prioritizing inspection and enforcement of this rule in areas most overburdened by pollution. We request that CARB make this document available to the public in electronic format. *See e.g.* Cal. Health and Safety Code Sec. § 25180.2.

Thank you for your consideration, and for your work developing these regulations.

Sincerely,

Julia May, Senior Scientist, **CBE** (Communities for a Better Environment)

Amy Vanderwarker, Co-Director, **CEJA** (California Environmental Justice Alliance)

Taylor Thomas, Research and Policy Analyst,
East Yard Communities for Environmental Justice

Madeline Stano, Staff Attorney, **CRPE** (Center on Race Poverty, & the Environment)

Michele Hasson, MPP, Policy Advocate/Specialist. **CCAEEJ** (Center for Community Action & Environmental Justice)

Jack Eidt, Steering Committee, **SoCal 350 Climate Action**

Joe Galliani, Founder and Co-Organizer, and
Sherry Lear, Co-Organizer **South Bay Los Angeles 350 Climate Action Group**

Anabell Chavez, Advisory Board Member, **Wilmington Improvement Network**

Jesse N. Marquez, Executive Director, **CFASE** (Coalition for a Safe Environment)

Drew Wood, Executive Director, **California Kids IAQ**, Wilmington

Ricardo Pulido, Executive Director, **Community Dreams**, Wilmington

Pastor Alfred Carrillo, **Apostolic Faith Center**, Wilmington

Chaplin Anthony Quezada, **American Veterans (AMVETS)**, Long Beach

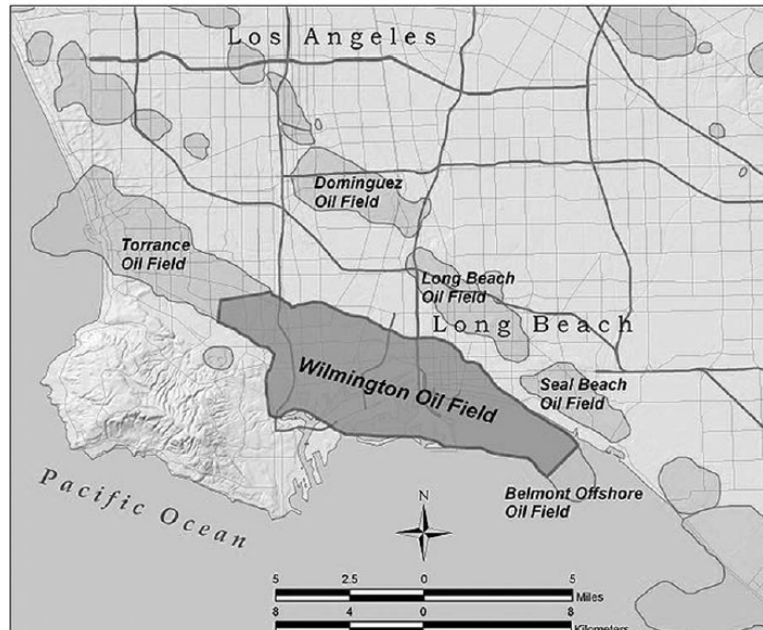
Magali Sanchez-Hall, MPH, Executive Director, **EMERGE**, Wilmington

Veronica Padilla, Executive Director, **Pacoima Beautiful**

Nancy Halpern Ibrahim, MPH, Executive Director, **Esperanza Community Housing Corporation**

Martha Dina Argüello, Executive Director, **PSR-LA** (Physicians for Social Responsibility - Los Angeles)

» In addition to oil refining, oil drilling is causing more fossil fuel cumulative impacts right in Wilmington



As if ports, freeways, and refineries weren't enough, Wilmington contains the third largest oil field in the U.S.

The oil field was previously considered depleted, but in recent years with new methods and the incentive of high oil prices, drilling has ramped up. CBE's Wilmington oil drilling campaign began in 2006. **People living around the Warren E&P drilling operations contacted CBE to report severe noise, sickening smells, air and water pollution, and breathing problems after the company purchased the site.** Neighbors reported constant diesel truck traffic through the residential streets, dust and oily residue covering and invading homes, constant flaring (from a stack burning oil field gas), and heavy vibrations at all hours of the day and night, seven days a week.

Although drilling operations occurred at this site in the past (at a much reduced level), when Warren E&P purchased the facility, production drastically increased, as did impacts on the community where it sits. Recent technological advances now allow oil companies to drill laterally, reaching out underground to large areas, that

previously would have been drilled from other locations. That means much larger volumes of oil and gas can come out of one drilling site, in a very intensive operation. Warren E&P has concentrated its drilling operations in this way at the "Wilmington Town Lot," in a residential neighborhood. Even though it borders an industrial area, it is hard to understand why such a neighborhood site would be chosen.

After neighbors called us, CBE worked together with the community to devise strategies to stop the impacts of the drilling. These included evaluating Warren's compliance with air, water, toxics and land use regulations, identifying methods and equipment to reduce flaring and air pollution, pushing for enforcement of existing bans for large diesel truck traffic through the neighborhood, getting paving and street-sweeping requirements implemented to stop the heavy construction dust blowing offsite, and pushing for better government agency monitoring.

CBE contacted the South Coast Air Quality Management District and the City of Los Angeles, and together with community members met with government officials and the company. CBE community organizers and Warren neighbors developed logs of impacts, took photos, videotaped flaring, and evaluated noise levels. Meanwhile CBE lawyers and scientists researched and documented health and environmental impacts, legal requirements, and Warren's permit limits.

It became clear that Warren was not in compliance with permit conditions and limits. After we contacted the Air Quality Management District, the regional agency issued a Notice of Violation to Warren for burning gases in the flare, far above its permit limits. Unfortunately the Air District then began rushing through a permit that would have allowed even more flaring. CBE challenged it and the Air District withdrew it. CBE and neighbors met with the Air District staff and chief to describe the severe conditions. The Air District began to develop a new compliance plan to reduce Warren's air pollution.

(continued next page)



Photo from video by Rember Sosa, neighbor to Warren oil drilling

In a CBE survey, Wilmington neighbors described oil drilling operations as “a living hell.”

CBE organizers carried out a survey of neighbors after bitter complaints about Warren drilling, with the following different responses from neighbors:

- It's been different since the Warren site came to the neighborhood
- A lot of allergies, breathing problem, headaches, chronic problems, lack of sleep
- Get a weird taste in my mouth, difficulty in bad traffic, breathing, there's a breeze of dust, the house is full of dust, must close the windows in the house 24/7
- Mainly health problems—sleeping. House always has dust and oily residue, vibrations. I know my blood pressure is just on edge, I just have to leave. This can't go on much longer.
- Smell, noise, illness. Extreme breathing difficulties, Dr. visits
- Evening noise—more dust, smells, extensive lung illness, constant coughing—less sleep
- Lots of dust. Every morning lots of black film all over the cars
- Problems breathing. More dust in my home, headache
- Affected my health by asthma, community is dirt
- Headache, nausea, and difficulty breathing



Neighbors attend public meeting on Warren Oil Drilling Operations at Los Angeles Councilwoman Hahn's office

After the Notice of Violation, CBE and members intensified work on the land use front. As a result of communications with the City and Wilmington's representative Janice Hahn, the Zoning Administrator instituted a review of Warren's Land Use requirements. CBE and members documented the suite of impacts, and submitted legal and technical briefs.

The morning of the hearing, Warren packed the auditorium by providing free breakfast to busloads of Warren E&P shareholders and royalty recipients from outside the community who didn't have knowledge of local impacts. CBE members from the neighborhood were dismayed and offended by this show, but many still overcame their disillusionment and spoke out eloquently at the hearing. It took months before the Zoning Administrator issued a decision, adding few requirements including restrictions on hours of operation and trucking, but not sufficient to meet neighbors' concerns.

CBE and members continued documenting ongoing impacts from Warren, and pursued the Air District process, where the agency and polluter were collaborating

on a long-term plan to relieve Warren of liability for its air violations. CBE testified and offered evidence at the quasi-trial conducted by the Air District Hearing Board on Warren's permit violations.

Neighbors urged the Board to reject the plan and require compliance with the law. Although the Hearing Board denied our challenge, the community efforts resulted in the Air District issuing a more protective compliance plan to decrease Warren's flaring, improve equipment, ultimately send gases offsite for sale instead of burning onsite, and more. Warren is now required to comply with more enforceable air protections.

Although CBE and neighbors were very dissatisfied with the formal decisions at the hearings, the community pressure meant that much was accomplished behind the scenes to get the City and the Air District to force Warren to clean up operations, while they awaited permit decisions. While neighbors are very happy that conditions have greatly improved, many are concerned that this may be only a temporary improvement.

HEALTH IMPACTS OF OIL DRILLING

- H₂S and other hazardous sulfur compounds such as SO_x (Sulfur Oxides) can hurt breathing, and can be released by oil drilling operations including well heads, pumps, piping, separation devices, storage tanks, and flaring.
- The US Agency for Toxic Substances and Disease Registry found: People can smell H₂S at low levels. Lower level, long-term exposure can cause eye irritation, headache, fatigue, respiratory irritation, and at high levels, death.²⁹
- Studies found people living near oil and gas wells had higher levels of many diseases.³⁰
- Oil drilling operations also cause emissions of VOCs (Volatile Organic Compounds), which include smog-producing and cancer-causing chemicals.

People are concerned that Warren may only be temporarily on its best behavior, prior to the next permit approval needed, and may relapse in the future. The facility is slated to further increase production for years. There is also a major concern that reduced noise and pollution is due to reduced production because crude oil prices are currently down again. Warren may have ramped down production until prices go up again. If production increases greatly, there is concern impacts could increase greatly.

Neighbors are also very frustrated about foundation damage to their homes that was never compensated. Continued watchdogging is needed to protect neighbors from this terribly inappropriate siting. **A serious Cumulative Impact policy could have prevented this bad siting.**

A FEW CAMPAIGN RESULTS

	Positive Result for Now?	Permanent Solution?
Diesel trucking through neighborhood	✓	?
Construction dust from dirt	✓	✓
Continuous flaring	✓	?
Noise	✓	?
Smells	✓	?
Foundation damage	☹	☹

- The frequent, illegal diesel trucking through the neighborhood has stopped; the crude oil is now piped offsite instead of trucked.
- Extreme construction dust is apparently permanently stopped on the main site. Warren has now complied with its original requirement to pave the site (though a nearby area is still in question)
- Constant flaring has stopped for now
- Noise has improve greatly, possibly temporary
- Smells have improved



July 7, 2015
Via Electronic Mail
South Coast Air Quality Management District

Re: Rule 1148.2- Notification for Oil & Gas Wells Urgently Needs Board Improvements

Dear Members of the AQMD Governing Board,

We write on behalf of Stand Together Against Neighborhood Drilling Los Angeles (STAND LA), a coalition of community-based environmental health and justice groups heavily impacted by oil drilling / extraction operations in the Los Angeles region, and public health advocates. Our coalition and other community members actively participated in the development and recent amendments of Rule 1148.2. In the current June 2015 rule revision process, our members have expressed many concerns during meeting, workgroups, and telephone calls. We very much appreciate your staff meeting with us and holding public meetings to improve Rule 1148.2 (June 2015 rule version¹). However, there are remaining deficiencies in the rule that must be addressed in order to make the rule's measures meaningful to impacted communities. Without these additional strengthening measures, the rule will continue to leave communities unprotected.

The District has legal and policy mandates to protect public health, and the public has the right to know about the use and emissions of dangerous chemicals and activities in communities. This is especially true where many of these facilities should never have been permitted to operate in such close proximity to people's residences.

Accordingly, we respectfully request that Rule 1148.2 be further amended to incorporate the measures outlined below. Please also see the photos directly below and further in our letter, which dramatically document the extreme proximity of heavy extraction activities to neighbors (right outside apartment windows).

Please also see the brief summary below of rule deficiencies and actions that we urge that the Board to take.

¹ Available at http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1148_2/7---att-f-par1148-2d-30-day-package.pdf?sfvrsn=2



The following comments most urgently need Board action at the July 10th hearing:

- **Rule 1148.2 should include injection well activities used for oil or gas operations (pictured above).** We have continually expressed our position that there exists no practical or principled reason for excluding injection wells from the rule. At the May 19, 2015 workshop, industry representatives agreed that there is no practical distinction between injection and production wells. Well injection activities can cause toxic air emissions and greenhouse gases the same way that production wells do, and there is no basis for exempting them. We urge the Board to further amend Rule 1148.2 to include reporting, notification, recordkeeping, and any other requirements of the rule for injection wells. We also urge that the District to perform source testing (direct measurement of emissions) of well injection activities, with a commitment to do so in a Board Resolution.
- **Families need 72-hour notice of well work with same-day certainty of when the activities are going to take place.** While providing 72-hour notice is a step in the right direction, families are left with no certainty about the day when well work will take place, so they can move their children from harm's way. **The current allowance for up to 5 extensions makes the 72-hour notice somewhat meaningless, unworkable, and must be struck.** These repeated extension allowances should be eliminated from the rule, or reduced to no more than one. At the May 19, 2015 workgroup meeting, industry representatives voiced that a maximum of three extensions would be agreeable to them, so it is troubling that impacted residents are asked to tolerate up to a week of uncertainty as to when hazardous well activity may take place. We strongly urge the Board to provide greater certainty and protections to residents by further reducing the number of extensions that an operator may have prior to issuing a new notification.

- **Local Notification is missing, and is a basic necessity** – Currently there is no local notification required. The AQMD should require signs posted 72-hours in advance on every gate warning the local community of well work. District staff have repeatedly expressed that this is reasonable, but that it could not be done in time for this approval. The AQMD likely has existing local notice requirements covering other facilities which may be readily adapted.
- **Meaningful public notice requires that notice also be provided in Spanish and other languages, as appropriate.** As we have discussed with District Staff, providing notice in Spanish is not cumbersome, and would impose no additional requirements on operators. The email notices that are issued to subscribers of 1148.2 notices could be issued in English, followed by a Spanish translation. The 1148.2 notices could be modified to have field headers in both languages, such as, “Operator/Operador.” The District has promised these modifications, and we would appreciate a commitment in a Board resolution.

We also urge that the following key issues be addressed through a Board Resolution:

- **Public data access and website disclosure improvements are needed, whether within or outside the rule.** At this juncture, we urge a Board Resolution to be adopted the July 10th hearing committing to these improvements, as frequently proposed by community members;
- **Increased enforcement mechanisms are necessary to turn around poor compliance records,** and we urge this to be included in a Board Resolution at the July 10th hearing. For example, STAND LA members spent considerable time reviewing District 1148.2 reports and found numerous errors, including complete failure to give notice, or late notice, failure to label air toxins, incorrect CAS Numbers, empty entry for facility ID, and incorrect zip codes. Such errors have greatly undermined the reporting and public notice value of the regulation.
- **A plan for increased monitoring and modeling are needed.** Such a plan should be committed to development in a Board Resolution for the July 10th hearing;
- **Importantly, the rule is still completely missing requirements for *eliminating or preventing* air emissions,** which was identified as a need more than two years ago, and are not covered by the other extraction rule (1148.1). Again, we urge development of a Board Resolution to begin this process, as the District has already stated it plans to, after adoption of the proposed changes.

Please see the additional photos below:



July 15, 2014: A worker in head to toe protective gear beside red DANGER tape stands behind tanker trucks parked right next to homes.



July 15, 2014: Heavy diesel equipment including two tanker trucks behind red DANGER tape sit idling outside bedroom windows at FMOG's Jefferson Drill Site.

More on the urgent need to include injection wells

The District currently does not consider injection well operations as included in Rule 1148.2's requirements. Since injection wells may: (1) process the same chemicals as extraction wells, (2) involve waste materials that can be contaminated with hydrocarbons, and (3) cause upwelling of gases from injection wells, we believe reporting and monitoring of these wells is essential to enable the District to evaluate emissions.

The District acknowledged that injection wells have the potential to cause air emissions and was considering that these may be covered without a rule change, but we have not yet been provided any assurance that this enforcement will happen.² There is no justification showing why injection well activities should not carry the same reporting requirements.

²*Proposed Amended Rule 1148.2 Working Group Meeting May 19, 2015, provides: "Comment: Injection wells should be included in rule, particularly injection wells where similar well stimulation techniques are used such as*

- (16) WELL means an oil or gas well, a hole drilled for the purpose of producing oil or gas, or a well into which fluids are injected.

The plain language of the rule can be read to include injection wells, and there is no exemption in the rule for injection wells in the regulation, so accordingly, any well used in relation to oil or gas operations into which fluids are injected should be subjected to all R. 1148.2 requirements. Again, there is no principled or practical reason to exempt injection wells or treat them differently. We urge that the Board enforce the regulation, and in addition carry out monitoring and reporting activities for well injection activities.

The photos below document major equipment in close proximity to neighbors for injection well activities using hazardous chemicals. The photos illustrate dangers to residents by such events, and underscore the need to collect data on all injection wells and inform residents.



October 3, 2014: Heavy diesel equipment, including four idling diesel tanker trucks at the Jefferson Drill Site each with a carrying capacity of 5,000 gallons, bearing labels 3264 for Corrosive Liquid and 1789 for Hydrochloric Acid, parked next to homes. FMOG told an AQMD inspector that the work was on an injection well and therefore not subject to 1148.2 reporting. Also see photos below.

acidizing; –Currently evaluating –Staff understands concern that injection wells can undergo similar treatments (e.g., acidizing) to production wells and are subject to the same emission impacts from on-site engines and treatment fluids –Issue will be addressed in Rule 1148.2 recommendations to Stationary Source Committee in June,” at Slide 6



October 3, 2014: Following the unreported acid maintenance work on an injection well, plant material on the downwind corner of the facility showed signs of fatal chemical exposure.

In conclusion, we the undersigned *urge* the Board to take the actions listed at the beginning of this letter, as a basic matter of protecting public health from hazardous materials and operations of oil extraction occurring in extremely close proximity to neighbors. Thanks for your attention!

Sincerely,

Richard Parks, President, Redeemer Community Partnership

Ashley Hernandez, Community Organizer, and Julia May, Senior Scientist,
Communities for a Better Environment

Rabeya Sen, Director of Policy, Esperanza Community Housing Corporation

Sandy Navarro, Project Coordinator, People Not Pozos, Esperanza Community Housing

Monic Uriarte and Nalleli Cobo, People Not Pozos members and former Allenco Neighbor'

Bhavna Shamasunder, Urban and Environmental Policy, Occidental College

D. Malcolm Carson, Esq. General Counsel and Policy Director for Environmental Health,
Community Health Councils

Rev. Kelvin Sauls, Senior Pastor, Holman United Methodist Church, Los Angeles, CA

Martha Dina Arguello, Executive Director, and Jennifer Kim, Air Quality & Health Associate,
Physicians for Social Responsibility - Los Angeles

cc. Dr. Barry Wallerstein, Susan Nakamura, Ed Eckerle, SCAQMD

Attachment

Attachment to 1148.2 Comments by STAND LA to AQMD Board —Additional Issues brought to the District, for follow-up—

After proposing these to the District, staff indicated these will be addressed through follow-up actions after adoption of the current rule changes. This is to memorialize STAND LA's comments regarding public information access and rule enforcement.

A. Additional public access improvements needed to enhance transparency

SCAQMD's website was an important step toward providing residents with vital public health information. AQMD should increase public accountability and health by enhancing data transparency. The District has committed to improvements in the future.

1. Disclose chemical supplier information. AQMD collects chemical supplier information, but does not currently disclose the information. The public needs this information to acquire Material Safety Data Sheets (MSDS) ([link](#)) for specific trade name chemicals. MSDS sheets provide a fuller picture of the contents and scientifically established health risks of the products. The District has offered to provide an online library of chemicals health impacts.
2. Allow Search by facility ID. AQMD should allow searches of well events by Facility ID. For example, FMOG sometimes hyphenates its name, and as a result, searching for "Freeport-McMoRan Oil and Gas" provides different results than when using "Freeport McMoRan Oil & Gas" without the hyphen. Inconsistent use of operator names skews data and makes accessing accurate data unnecessarily difficult and confusing. Allowing a search by Facility ID is a common sense, no-cost solution that can consolidate minor differences in search entries and prevent errors. Other data entry errors by reporting facilities underscore the need for accountability and enforcement. We appreciate the District's commitment to provide this.
3. Require website disclosure on combustion equipment, dry materials, and fluids, not just reporting to the District.
4. Require reporting of Diesel Engine Emissions (including for extraction and injection wells), in both reports to the District and website reporting.
5. Ensure that data reported are complete, and clean.
6. Allow for more refined electronic notification to interested parties. Presently, residents must proactively sign up to receive all notifications for the SCAQMD region, although most of the region-wide notification is not directly relevant to their families. Residents should be able to screen the notifications they receive by Facility ID and zip code.

B. Strengthen Enforcement Mechanisms.

While the District has many existing enforcement mechanisms, they have not been fully utilized to address non-compliance with Rule 1148.2's requirements. We urge the District to step-up enforcement for non-compliance with the regulation, including significantly increasing fines, increasing inspections, and revoking permits. We understand the District has limited personnel, but the District has the option to increase fees for this sector to enable increased policing of non-compliance. The District has stated that it identifies missing information, spot checks all the data, and has offered to provide a mechanism for the public to report incorrect information, which would be useful. However, we still urge increased District enforcement, as compliance with accurate reporting is necessary to ensure public safety and should be a minimal requirement to operate businesses with high risks to public and environmental health.

Examples of non-compliance:

STAND LA members have spent considerable time reviewing reports, such as FMOG's, and found numerous errors in reporting. These include failure to label air toxins, incorrect CAS Numbers, empty entry for facility ID, and incorrect zip codes. Such errors greatly undermine the reporting and public notice value of the regulation. (*Note: these errors are based on event reports at facility ID 144664, Events 397, 417, 564, 628, 1934, 1952.*) Many of these problems are ongoing and incorrect on the website data to this day:

- Incorrect Zip code: Event 397 and 417 was submitted with the incorrect zip code (90044 instead of 90007). In our initial search for all events at a facility of concern by zip code, these events did not show up because the zip code was incorrect. Additionally, these two events did not even submit a facility ID.
- Unlabeled reportable air toxins: Several entries throughout the event reports for facility ID # 144644 did not properly label chemicals that are known air toxins. There are a total of 18 entries that should have been labeled air toxins, but were not.
- Incorrect CAS Numbers: This is important because chemicals have several synonyms. One of the only ways to understand the total quantity of a particular substance is by CAS numbers. On Event 564, 3 entries were submitted with incorrect CAS Numbers.
- Late event and late chemical reporting, or no notice:
 - Of the 6 reported events at facility ID #144664, only 1 has fulfilled the 24-hour notice. Four events (397, 417, 564, 628) submitted the event report an average of 350 days after the drilling date. This failure to report prevents AQMD inspectors from being on hand, and residents from taking precautions to protect their families. The regulation requires that notifications be posted well within 24-hours. (Section (d))
 - Chemical Report submission for Events 397 and 1934 exceeded the 60-day requirement. Event 397 was submitted 471 days, 1.3 years, after the date of drilling. It involved gravel packing, which requires use of known carcinogenic material.

When STAND LA coalition members raised these violations with some of the AQMD staff, they were told that the function of Rule 1148.2 is for reporting only, not enforcement. This cannot be correct – the District's regulations are mandatory, not voluntary, and we believe that other

District staff have confirmed that there are enforcement mechanisms available. Without the real threat of public enforcement and accountability, FMOG and other oil companies will have little incentive to comply. A regulation without an enforcement mechanism leaves too great of a possibility of non-compliance, which drains the Rule of meaning.

Given the critical importance of accurate reporting, inaccurate or incomplete notifications should (1) immediately trigger a “kill switch” stopping the well event, (2) generate a Notice of Violation, and (3) require new notification no less than 7-days before the scheduled activity.

Inaccuracies or incomplete Chemical Reports or failure to comply with the 60-day Chemical Report requirement should (1) trigger a Notice of Violation and (2) impose an immediate moratorium on new well events until the deficiency is corrected, plus a 90-day penalty.

Either way, current enforcement has not been sufficient to ensure that facilities are complying with the Rule, and we therefore urge that more resources, and strong disincentives for non-compliance, be provided, in addition to provisions for the public to report errors.



January 8, 2016

Via electronic mail

South Coast Air Quality Management District

Re: Case No. 137-76, Porter Ranch Gas Leak – Support neighbors, take immediate action

Dear Members of the AQMD Governing Board,

We write as members of Stand Together Against Neighborhood Drilling Los Angeles (STAND LA), a coalition of community-based environmental health and justice groups heavily impacted by oil extraction operations in Los Angeles, as well as public health advocates, to express our grave concern for the health and safety people living near the severely leaking Porter Ranch natural gas storage facility of Southern California Gas (SoCal Gas).

The District website states that it has received over 1,800 complaints about odors, headaches, nausea, vomiting, and bloody noses due to the leak,¹ and thousands of families have been evacuated. As communities on the frontlines of oil and gas extraction operations, we unfortunately live with similar health hazards and know too well the suffering and fear that Porter Ranch residents are experiencing. No family should be subjected to these hazards, and we ask that you act swiftly, and to the full extent of your authority, to put a final end to the threats posed by the gas storage facility.

We are also alarmed at the enormity of the greenhouse gas emissions, reportedly reaching 60,000 kilograms of methane per hour (over 100,000 pounds/hour), or one quarter of the entire state's methane emission!²

Aerial infra-red Video of the Porter Ranch gas leak:



<https://www.edf.org/media/new-footage-reveals-first-aerial-view-methane-leak-polluting-los-angeles-county>

¹ <http://www.aqmd.gov/home/regulations/compliance/aliso-canyon-update/compliance-enforcement-actions/odor-complaints>

² <http://www.latimes.com/local/california/la-me-0104-gas-leak-20160104-story.html>; see also <http://www.dailynews.com/environment-and-nature/20151211/heres-what-you-need-to-know-about-the-porter-ranch-gas-leak>

We appreciate the District's efforts and strongly urge it to issue an order of abatement. Given the extreme health and safety risks posed to residents, however, we ask that the District's order direct SoCal Gas to shut down its gas storage facility. We understand that the repairs of the underground leak are technically complex and that the long-term feasibility of the facility is in serious question. Most importantly, however, oil and gas operations are inherently incompatible with neighborhoods. It is unconscionable that the government's response to such industrial dangers would be to force human beings out of their homes or risk extreme injury, rather than force the facility to abandon the neighborhood. Human rights to live in a safe environment, including breathing clean air, should unquestionably trump industrial and economic concerns. Accordingly, we support neighbors' call for closure of the gas storage facility. This may include drawing down the current storage of gas and ensuring that no additional gas is piped into the reservoir, immediate and maximum efforts to stop the leaks, and transparent evaluation of alternative storage sites away from neighborhoods. The district should also evaluate how we are going to phase out our use of natural gas in the region through clean, alternative energy as soon as possible.

While we maintain that closure of the gas storage facility is the necessary and required response, at minimum, we urge the SCAQMD to:

- 1) Order SoCal Gas to continue to meet the neighbors demands and protect public health;
- 2) Ensure that ongoing AQMD monitoring at the site and in neighborhoods includes not only methane and VOCs, but also mercaptans, benzene, and any other emissions that have the potential to impact health and the environment;
- 3) Order SoCal to stop the gas leaks as expeditiously as possible;
- 4) Levy the maximum possible penalties/fines for every day the leaks continue;
- 5) Require SoCal Gas to make all details of their plans and timelines to stop the leaks public;
- 6) Require SoCal Gas to immediately pay for independent experts to evaluate whether these plans are as expeditious as possible;
- 7) Require SoCal Gas to fund zero carbon renewable energy sources that would offset an equivalent amount of greenhouse gases emitted by the leaks; and
- 8) Require SoCal Gas to pay for an independent public study of methane leaks of all its facilities, including storage, pipelines, processing, distribution and other facilities in the District, and recommendations for preventing further leaks.

We understand that Governor Brown has declared a state of emergency over this extreme methane leak, which is now the subject of international concern. While we appreciate the Governor's action, it should not deter the District from taking every possible action in its own powers.

Oil and gas production, storage, processing, and distribution are causing health, human rights and land-use problems all over the South Coast District. Neighbors are being severely impacted by emissions, flaring, odors, loud noises, and those in close proximity to the most extreme of hazardous compounds are threatened by hydrogen fluoride, and many other hazards. The AQMD is well aware that neighbors near such facilities throughout the District are extremely concerned about their health and welfare.

The disastrous situation at Porter Ranch not only requires the most extraordinary efforts to protect neighbors' health and the atmosphere we all depend on immediately, but this emergency

is yet another indicator that the oil and gas industry poses unacceptable risks to the region and the planet. We urge you to begin a comprehensive study of health impacts of oil and gas operations, in furtherance of developing new and comprehensive policies to prevent these land use, public health, and environmental conflicts in the South Coast District.

Sincerely,

Julia May, Senior Scientist, & Gladys Limón, Staff Attorney, Communities for a Better Environment

Nancy Halpern Ibrahim, MPH, Executive Director, Esperanza Community Housing

Rev. Kelvin Sauls, Senior Pastor, Holman United Methodist Church, Los Angeles, CA

Richard Parks, President, Redeemer Community Partnership

Martha Dina Arguello, Executive Director, and Jennifer Kim, Air Quality & Health Associate, Physicians for Social Responsibility - Los Angeles

Bhavna Shamasunder, Urban and Environmental Policy Department, Occidental College

Cc: Dr. Barry Wallerstein, Executive Officer SCAQMD
Los Angeles City Councilmember Mitch Englander

Address: 833 IV Boring BL HB

WILMINGTON COMMUNITY SURVEY

QUESTIONS	ANSWERS (PLEASE CIRCLE)
FLARES	
1. Has there been a burning flare on the Warren site (more than just a light at the top)?	Yes <input checked="" type="radio"/> No I don't know
2. In the last month, how often has the flare been burning?	Rarely (once/twice) <input checked="" type="radio"/> Sometimes (once/wk) A lot (once/day) All the time
NOISE	
3. How much has the noise increased in your neighborhood due to the Warren site?	Not much A little <input checked="" type="radio"/> A lot So much that I can't stand it!
4. Have you heard loud noises coming from the site?	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. Between 10 pm and 7 am, Warren is required to maintain quiet time. Do you feel they are doing this?	<input checked="" type="radio"/> Yes <input type="radio"/> No
6. How often has the noise kept you awake at night?	Not much (less than once/month) A little <input checked="" type="radio"/> A lot (at least once/wk) Most nights
ODOR	
7. Have you smelled any strange odors?	Rarely (less than once/month) Sometimes A lot (at least once/wk) <input checked="" type="radio"/> All the time
TRAFFIC	
8. Has truck traffic increased since Warren started operating in 2006?	Not much (one extra truck/month) <input checked="" type="radio"/> A little (one extra truck / wk) A lot (one extra truck/day)

Address: 833 "N" Baring BL #B

QUESTIONS	ANSWERS (PLEASE CIRCLE)
15. Were you told that Warren obtained a permit to operate over the next 12 years at that site?	Yes No <u>I don't remember</u>
16. Were you told that truck traffic would increase after operation began?	<u>Yes</u> No I don't remember
17. Were you told that the Warren operations could increase noise in the neighborhood?	Yes No <u>I don't remember</u>
18. Did any one representing Warren tell you about any possible health impacts from operations?	<u>Yes</u> No I don't remember
OPINION / FEELINGS / OTHER EXPERIENCES	
19. Has your opinion regarding the Warren site changed based on your experience since operation began?	<u>Yes</u> No
a. If yes, in what way?	In a good way <u>In a bad way</u>
20. Based on your experience with the Warren facility, would you have approved this facility in your community?	Yes <u>No</u> I don't care
21. In addition to what you've already talked about, what has your experience been living in the neighborhood since activity at the Warren site began?	

Interested in more information and/or getting involved:

Name: Agustin Mendez

Address: 833 "N" Baring BL #B Wilmington CA 90744

Tel: no E-mail _____

Domicilio: 803 N. Hanninger #8

ENCUESTA COMUNITARIA DE WILMINGTON

PREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
QUEMADORES	<u>Si</u>
1. ¿Han habido quemadores ardiendo en el sitio de Warren (mas que solo una luz)?	No No Se
2. En el ultimo mes, ¿Que tan seguido ha estado ardiendo el quemador?	Raramente (una/dos) Abecés (once/wk) Mucho (once/día) <u>Todo el tiempo</u>
RUIDO	Casi no
3. ¿Cuanto ruido se ha aumentado en el vecindario debido al sitio Warren?	Poquito <u>Mucho</u> Insoportablemente
4. ¿Ha escuchado ruidos fuertes que vengan del sitio Warren?	<u>Si</u> No
5. Entre los horarios de 10 PM y 7 AM, Warren ha sido ordenado a mantener silencio. ¿Siente que han hecho esto?	<u>Si</u> No
6. ¿Que tan seguido se ha mantenido despierto a causa del ruido por las noches?	No mucho (menos de una/mes) Poco Mucho (al menos 1x semana) <u>las noches</u>
LORES	Raramente (menos 1 ves por mes)
7. ¿Ha sentido algún olor raro?	Abecés Mucho (1 ves x semana) <u>Todo el tiempo</u>
TRAFICO	No mucho (1 camión extra x mes)
8. ¿Desde que empezó Warren en 2006, Ha visto un aumento en el tráfico de camiones de carga?	Poco (1 camión extra x semana) <u>Mucho (1 camión extra x día)</u>

Domicilio: _____

PREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
16. ¿Se le informo que habría un aumento de tráfico al empezar el trabajo en sitio?	Si <u>No</u> No recuerdo
17. ¿Se le aviso que las operaciones en el sitio de Warren aumentarían el ruido en el vecindario?	Si <u>No</u> No recuerdo
18. ¿Algún representante de Warren le aviso de posibles impactos de salud a resultado de las actividades en el sitio?	Si <u>No</u> No recuerdo
OPINION / SENTIMIENTOS / OTRAS EXPERIENCIAS	
19. ¿Ha cambiado su opinión sobre el sitio de Warren, basado en su experiencia desde que empezó a operar?	Si <u>No</u>
a. Si es así, ¿de que forma?	En forma positiva <u>En forma negativa</u>
20. Basado en su experiencia, ¿habiera aprobado el proyecto en su comunidad?	Si <u>No</u> No le interesa
21. Junto con lo que me acaba de platicar, ¿Cuál ha sido su experiencia viviendo en esta comunidad desde que se empezó la actividad en el sitio Warren?	

RUIDO
 POLVO
 NO DESEA O O RUIDO

Si le interesa involucrarse o para recibir mas informacion:

Nombre: LEONARDO CARDENAS

Domicilio: # 833 N. BENNY BOULEVARD

Tel: (310) 413-82-65 Correo Electronico _____

Address: 945 N BANNING

WILMINGTON COMMUNITY SURVEY

QUESTIONS	ANSWERS (PLEASE CIRCLE)
FLARES	
1. Has there been a burning flare on the Warren site (more than just a light at the top)?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> I don't know
2. In the last month, how often has the flare been burning?	<input type="radio"/> Rarely (once/twice) <input type="radio"/> Sometimes (once/wk) <input type="radio"/> A lot (once/day) <input checked="" type="radio"/> All the time
NOISE	
3. How much has the noise increased in your neighborhood due to the Warren site?	<input type="radio"/> Not much <input type="radio"/> A little <input type="radio"/> A lot <input checked="" type="radio"/> So much that I can't stand it!
4. Have you heard loud noises coming from the site?	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. Between 10 pm and 7 am, Warren is required to maintain quiet time. Do you feel they are doing this?	<input type="radio"/> Yes <input checked="" type="radio"/> No
6. How often has the noise kept you awake at night?	<input type="radio"/> Not much (less than once/month) <input type="radio"/> A little <input type="radio"/> A lot (at least once/wk) <input checked="" type="radio"/> Most nights
ODOR	
7. Have you smelled any strange odors?	<input type="radio"/> Rarely (less than once/month) <input type="radio"/> Sometimes <input type="radio"/> A lot (at least once/wk) <input checked="" type="radio"/> All the time
TRAFFIC	
8. Has truck traffic increased since Warren started operating in 2006?	<input type="radio"/> Not much (one extra truck/month) <input type="radio"/> A little (one extra truck / wk) <input checked="" type="radio"/> A lot (one extra truck/day)

Address: _____

QUESTIONS	ANSWERS (PLEASE CIRCLE)
15. Were you told that Warren obtained a permit to operate over the next 12 years at that site?	Yes <input checked="" type="radio"/> No I don't remember
16. Were you told that truck traffic would increase after operation began?	Yes <input checked="" type="radio"/> No I don't remember
17. Were you told that the Warren operations could increase noise in the neighborhood?	Yes <input checked="" type="radio"/> No I don't remember
18. Did any one representing Warren tell you about any possible health impacts from operations?	Yes <input checked="" type="radio"/> No I don't remember
OPINION / FEELINGS / OTHER EXPERIENCES	
19. Has your opinion regarding the Warren site changed based on your experience since operation began?	<input checked="" type="radio"/> Yes No
a. If yes, in what way?	In a good way <input checked="" type="radio"/> In a bad way
20. Based on your experience with the Warren facility, would you have approved this facility in your community?	Yes <input checked="" type="radio"/> No I don't care
21. In addition to what you've already talked about, what has your experience been living in the neighborhood since activity at the Warren site began?	Living Hell!!

Interested in more information and/or getting involved:

Name: Gloria Robledo

Address: 945 N. BANNING BLVD WILM. CA 90784

Tel: (310) 830-2535

E-mail: _____

Domicilio: 837 N Banning
BIV

ENCUESTA COMUNITARIA DE WILMINGTON

PREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
QUEMADORES	<input checked="" type="checkbox"/> No <input type="checkbox"/> No Se
1. ¿Han habido quemadores ardiendo en el sitio de Warren (mas que solo una luz)?	
2. En el ultimo mes, ¿Que tan seguido ha estado ardiendo el quemador?	<input type="checkbox"/> Raramente (una/dos) <input type="checkbox"/> Abecés (once/wk) <input type="checkbox"/> Mucho (once/día) <input checked="" type="checkbox"/> Todo el tiempo
RUIDO	<input checked="" type="checkbox"/> Casi no <input type="checkbox"/> Poquito <input type="checkbox"/> Mucho <input type="checkbox"/> Insoportablemente
3. ¿Cuanto ruido se ha aumentado en el vecindario debido al sitio Warren?	
4. ¿Ha escuchado ruidos fuertes que vengan del sitio Warren?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Si
5. Entre los horarios de 10 PM y 7 AM, Warren ha sido ordenado a mantener silencio. ¿Siente que han hecho esto?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Un Poco
6. ¿Que tan seguido se ha mantenido despierto a causa del ruido por las noches?	<input type="checkbox"/> No mucho (menos de una/mes) <input type="checkbox"/> Poco <input type="checkbox"/> Mucho (al menos 1x semana) <input checked="" type="checkbox"/> las noches
LORES	<input type="checkbox"/> Raramente (menos 1 ves por mes) <input type="checkbox"/> Abecés <input checked="" type="checkbox"/> Mucho (1 ves x semana) <input type="checkbox"/> Todo el tiempo
7. ¿Ha sentido algún olor raro?	
TRAFICO	<input type="checkbox"/> No mucho (1 camión extra x mes) <input type="checkbox"/> Poco (1 camión extra x semana) <input checked="" type="checkbox"/> Mucho (1 camión extra x día)
8. ¿Desde que empezó Warren en 2006, Ha visto un aumento en el tráfico de camiones de carga?	

Domicilio: _____

PREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
16. ¿Se le informo que habría un aumento de tráfico al empezar el trabajo en sitio?	Si <input checked="" type="checkbox"/> No No recuerdo
17. ¿Se le aviso que las operaciones en el sitio de Warren aumentarían el ruido en el vecindario?	Si <input checked="" type="checkbox"/> No No recuerdo
18. ¿Algún representante de Warren le aviso de posibles impactos de salud a resultado de las actividades en el sitio?	Si <input checked="" type="checkbox"/> No No recuerdo
OPINION / SENTIMIENTOS / OTRAS EXPERIENCIAS	
19. ¿Ha cambiado su opinión sobre el sitio de Warren, basado en su experiencia desde que empezó a operar?	<input checked="" type="checkbox"/> Si <input checked="" type="checkbox"/> No
a. Si es así, ¿de que forma?	En forma positiva <input checked="" type="checkbox"/> En forma negativa
20. Basado en su experiencia, ¿hubiera aprobado el proyecto en su comunidad?	Si <input checked="" type="checkbox"/> No No le interesa
21. Junto con lo que me acaba de platicar, ¿Cuál ha sido su experiencia viviendo en esta comunidad desde que se empezó la actividad en el sitio Warren?	
Muy Nuestra Salud ha Empeorado Las Alergias son muy fuertes la tierra que nos echo a perder Nuestros Muebles, La garganta de Mis hijos todo ha hido mal.	

Si le interesa involucrarse o para recibir mas informacion:

Nombre: Laura Callejas

Domicilio: 837 N "B" Bannig Blv Wilmington CA

Tel: 310) 835-6824 Correo Electronico _____

Address: 937 Bannings

WILMINGTON COMMUNITY SURVEY

QUESTIONS	ANSWERS (PLEASE CIRCLE)
FLARES	
1. Has there been a burning flare on the Warren site (more than just a light at the top)?	<input checked="" type="radio"/> Yes No I don't know
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3. How much has the noise increased in your neighborhood due to the Warren site?	Not much A little <input checked="" type="radio"/> A lot So much that I can't stand it!
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Address: 937 BANNING

QUESTIONS	ANSWERS (PLEASE CIRCLE)
15. Were you told that Warren obtained a permit to operate over the next 12 years at that site?	Yes <input checked="" type="radio"/> No I don't remember
16. Were you told that truck traffic would increase after operation began?	Yes <input checked="" type="radio"/> No I don't remember
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19. Has your opinion regarding the Warren site changed based on your experience since operation began?	<input checked="" type="radio"/> Yes No
a. If yes, in what way?	In a good way <input checked="" type="radio"/> In a bad way
20. Based on your experience with the Warren facility, would you have approved this facility in your community?	Yes <input checked="" type="radio"/> No I don't care
21. In addition to what you've already talked about, what has your experience been living in the neighborhood since activity at the Warren site began?	A MESS.

Interested in more information and/or getting involved:

Name: Tony Jimenez

Address: 937 BANNING Blvd. Wilmington CA.

Tel: 310-830-8394 E-mail: Coyola-78@SBCGlobal.NET.

Jose Rodriguez
Domicilio: 1046 CARY ST. wk

ENCUESTA COMUNITARIA DE WILMINGTON

PREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
QUEMADORES	<input checked="" type="radio"/> Si
1. ¿Han habido quemadores ardiendo en el sitio de Warren (mas que solo una luz)?	No No Se
2. En el ultimo mes, ¿Que tan seguido ha estado ardiendo el quemador?	Raramente (una/dos) Abecés (once/wk) <input checked="" type="radio"/> Mucho (once/día) Todo el tiempo
RUIDO	<input type="radio"/> Casi no
3. ¿Cuanto ruido se ha aumentado en el vecindario debido al sitio Warren?	<input type="radio"/> Poquito <input checked="" type="radio"/> Mucho <input type="radio"/> Insoportablemente
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6. ¿Que tan seguido se ha mantenido despierto/a a causa del ruido por las noches?	No mucho (menos de una/mes) <input type="radio"/> Poco <input checked="" type="radio"/> Mucho (al menos 1x semana) las noches
OLORES	<input type="radio"/> Raramente (menos 1 ves por mes)
7. ¿Ha sentido algún olor raro?	<input type="radio"/> Abecés <input type="radio"/> Mucho (1 ves x semana) <input checked="" type="radio"/> Todo el tiempo
TRAFICO	<input type="radio"/> No mucho (1 camión extra x mes)
8. ¿Desde que empezó Warren en 2006, Ha visto un aumento en el tráfico de camiones de carga?	<input type="radio"/> Poco (1 camión extra x semana) <input checked="" type="radio"/> Mucho (1 camión extra x día)

Jose Rodriguez
Domicilio: 1046 CARY ST

PREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
16. ¿Se le informo que habría un aumento de tráfico al empezar el trabajo en sitio?	Si <input checked="" type="radio"/> No No recuerdo
17. ¿Se le aviso que las operaciones en el sitio de Warren aumentarían el ruido en el vecindario?	Si <input checked="" type="radio"/> No No recuerdo
18. ¿Algún representante de Warren le aviso de posibles impactos de salud a resultado de las actividades en el sitio?	Si <input checked="" type="radio"/> No No recuerdo
OPINION / SENTIMIENTOS / OTRAS EXPERIENCIAS	
19. ¿Ha cambiado su opinión sobre el sitio de Warren, basado en su experiencia desde que empezó a operar?	Si <input checked="" type="radio"/> No
a. Si es así, ¿de que forma?	En forma positiva <input checked="" type="radio"/> En forma negativa
20. Basado en su experiencia, ¿hubiera aprobado el proyecto en su comunidad?	Si <input checked="" type="radio"/> No No le interesa
21. Junto con lo que me acaba de platicar, ¿Cuál ha sido su experiencia viviendo en esta comunidad desde que se empezó la actividad en el sito Warren?	

Molestias por los olores el ruido y el trafico

Si le interesa involucrarse o para recibir mas informacion:

Nombre: Jose Rodriguez

Domicilio: 1046 CARY ST WILMINGTON

Tel: 310-518-5096 Correo Electronico

Domicilio: 937 Banning Blvd.

ENCUESTA COMUNITARIA DE WILMINGTON

FREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
QUEMADORES	
1. ¿Han habido quemadores ardiendo en el sitio de Warren (mas que solo una luz)?	<input checked="" type="radio"/> Si No No Se
2. En el ultimo mes, ¿Que tan seguido ha estado ardiendo el quemador?	Raramente (una/dos) Abecés (once/wk) Mucho (once/día) <input checked="" type="radio"/> Todo el tiempo
RUIDO	
3. ¿Cuanto ruido se ha aumentado en el vecindario debido al sitio Warren?	Casi no Poquito Mucho <input checked="" type="radio"/> Insoportablemente
4. ¿Ha escuchado ruidos fuertes que vengan del sitio Warren?	<input checked="" type="radio"/> Si No
5. Entre los horarios de 10 PM y 7 AM, Warren ha sido ordenado a mantener silencio. ¿Siente que han hecho esto?	Si <input checked="" type="radio"/> No
6. ¿Que tan seguido se ha mantenido despierto/a a causa del ruido por las noches?	No mucho (menos de una/mes) Poco <input checked="" type="radio"/> Mucho (al menos 1x semana) las noches
OLORES	
7. ¿Ha sentido algún olor raro?	Raramente (menos 1 ves por mes) Abecés Mucho (1 ves x semana) <input checked="" type="radio"/> Todo el tiempo
TRAFICO	
8. ¿Desde que empezó Warren en 2006, Ha visto un aumento en el tráfico de camiones de carga?	No mucho (1 camión extra x mes) Poco (1 camión extra x semana) <input checked="" type="radio"/> Mucho (1 camión extra x día)
9. ¿Como ha afectado el vecindario?	No mucho Poco <input checked="" type="radio"/> Mucho

Domicilio: 937 BANNING BLVD

PREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
17. ¿Se le aviso que las operaciones en el sitio de Warren aumentarían el ruido en el vecindario?	Si <u>NUNCA</u> <u>No</u> <u>JAMAS</u> No recuerdo
18. ¿Algún representante de Warren le aviso de posibles impactos de salud a resultado de las actividades en el sitio?	Si <u>NUNCA</u> <u>No</u> <u>JAMAS</u> No recuerdo
<u>OPINION / SENTIMIENTOS / OTRAS EXPERIENCIAS</u>	
19. ¿Ha cambiado su opinión sobre el sitio de Warren, basado en su experiencia desde que empezó a operar?	<u>Si</u> No
a. Si es así, ¿de que forma?	En forma positiva <u>En forma negativa</u>
20. Basado en su experiencia, ¿hubiera aprobado el proyecto en su comunidad?	Si <u>NUNCA</u> <u>No</u> <u>JAMAS</u> No le interesa
21. Junto con lo que me acaba de platicar, ¿Cuál ha sido su experiencia viviendo en esta comunidad desde que se empezó la actividad en el sitio Warren?	

MUCHO RUIDO POR EL RUIDO TRAFICO
DOLORES SABOR EN LA BOCA dificultad
EN RESPIRAR ~~siempre~~ siempre
BRISA de POLVO CASA LLENA DE POLVO
~~COMPARAR~~ TENER CASA SEPADA 24/7

Si le interesa involucrarse o para recibir mas informacion:

Nombre: Jose Vasquez

Domicilio: 937 BANNING BLVD. WILMINGTON CA. 90744

Tel: 310 830-8394
310 930-4562

Correo Electronico _____

Domicilio: 1126 Fries Ave
Wilmington, CA

ENCUESTA COMUNITARIA DE WILMINGTON

PREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
QUEMADORES	Si
1. ¿Han habido quemadores ardiendo en el sitio de Warren (mas que solo una luz)?	No No Se
2. En el ultimo mes, ¿Que tan seguido ha estado ardiendo el quemador?	Raramente (una/dos) Abecés (once/wk) Mucho (once/día) Todo el tiempo
RUIDO	Casi no
3. ¿Cuanto ruido se ha aumentado en el vecindario debido al sitio Warren?	Poquito Mucho Insoportablemente
4. ¿Ha escuchado ruidos fuertes que vengan del sitio Warren?	Si No
5. Entre los horarios de 10 PM y 7 AM, Warren ha sido ordenado a mantener silencio. ¿Siente que han hecho esto?	Si No
6. ¿Que tan seguido se ha mantenido despierto/a a causa del ruido por las noches?	No mucho (menos de una/mes) Poco Mucho (al menos 1x semana) las noches
OLORES	Raramente (menos 1 ves por mes)
7. ¿Ha sentido algún olor raro?	Abecés Mucho (1 ves x semana) Todo el tiempo
TRAFICO	No mucho (1 camión extra x mes)
8. ¿Desde que empezó Warren en 2006, Ha visto un aumento en el tráfico de camiones de carga?	Poco (1 camión extra x semana) Mucho (1 camión extra x día)
9. ¿Como ha afectado el vecindario?	No mucho Poco Mucho

Domicilio: _____

PREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
17. ¿Se le aviso que las operaciones en el sitio de Warren aumentarían el ruido en el vecindario?	Si <u>No</u> No recuerdo
18. ¿Algún representante de Warren le aviso de posibles impactos de salud a resultado de las actividades en el sitio?	Si <u>No</u> No recuerdo
<u>OPINION / SENTIMIENTOS / OTRAS EXPERIENCIAS</u>	
19. ¿Ha cambiado su opinión sobre el sitio de Warren, basado en su experiencia desde que empezó a operar?	<u>Si</u> No
a. Si es así, ¿de que forma?	En forma positiva En forma negativa
20. Basado en su experiencia, ¿hubiera aprobado el proyecto en su comunidad?	Si <u>No</u> No le interesa
21. Junto con lo que me acaba de platicar, ¿Cuál ha sido su experiencia viviendo en esta comunidad desde que se empezó la actividad en el sitio Warren?	mas trafico. mas polucion salud no muy bien

Si le interesa involucrarse o para recibir mas informacion:

Nombre: Jolanda Sierra

Domicilio: 1120 Fries Ave Wilmington

Tel: (310) 604-241-3074 Correo Electronico jsierradp@yahoo.com

Domicilio: 836 Lakme Ave

ENCUESTA COMUNITARIA DE WILMINGTON

PREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
<u>QUEMADORES</u>	<input checked="" type="radio"/> Si No No Se
1. ¿Han habido quemadores ardiendo en el sitio de Warren (mas que solo una luz)?	
2. En el ultimo mes, ¿Que tan seguido ha estado ardiendo el quemador?	Raramente (una/dos) Abecés (once/wk) Mucho (once/día) <input checked="" type="radio"/> Todo el tiempo
<u>RUIDO</u>	Casi no Poquito Mucho <input checked="" type="radio"/> Insoportablemente
3. ¿Cuanto ruido se ha aumentado en el vecindario debido al sitio Warren?	
4. ¿Ha escuchado ruidos fuertes que vengan del sitio Warren?	<input checked="" type="radio"/> Si No
5. Entre los horarios de 10 PM y 7 AM, Warren ha sido ordenado a mantener silencio. ¿Siente que han hecho esto?	Si <input checked="" type="radio"/> No
6. ¿Que tan seguido se ha mantenido despierto/a a causa del ruido por las noches?	No mucho (menos de una/mes) Poco Mucho (al menos 1x semana) <input checked="" type="radio"/> las noches
<u>OLORES</u>	Raramente (menos 1 ves por mes) Abecés Mucho (1 ves x semana) <input checked="" type="radio"/> Todo el tiempo
7. ¿Ha sentido algún olor raro?	
<u>TRAFICO</u>	No mucho (1 camión extra x mes) Poco (1 camión extra x semana) <input checked="" type="radio"/> Mucho (1 camión extra x día)
8. ¿Desde que empezó Warren en 2006, Ha visto un aumento en el tráfico de camiones de carga?	
9. ¿Como ha afectado el vecindario?	No mucho Poco <input checked="" type="radio"/> Mucho

Domicilio: 836 Lakme

PREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
17. ¿Se le aviso que las operaciones en el sitio de Warren aumentarían el ruido en el vecindario?	Si <input checked="" type="radio"/> No No recuerdo
18. ¿Algún representante de Warren le aviso de posibles impactos de salud a resultado de las actividades en el sitio?	Si <input checked="" type="radio"/> No No recuerdo
OPINION / SENTIMIENTOS / OTRAS EXPERIENCIAS	
19. ¿Ha cambiado su opinión sobre el sitio de Warren, basado en su experiencia desde que empezó a operar?	<input checked="" type="radio"/> Si <input checked="" type="radio"/> No
a. Si es así, ¿de que forma?	En forma positiva <input checked="" type="radio"/> En forma negativa
20. Basado en su experiencia, ¿hubiera aprobado el proyecto en su comunidad?	Si <input checked="" type="radio"/> No No le interesa
21. Junto con lo que me acaba de platicar, ¿Cuál ha sido su experiencia viviendo en esta comunidad desde que se empezó la actividad en el sitio Warren?	
Negativa	

Si le interesa involucrarse o para recibir mas informacion:

Nombre: Rosa T Cuevas

Domicilio: 836 Lakme Ave

Tel: 310) 991 3380

Correo Electronico _____

Mitchell St. Jones
Address: 1056 Cary Ave
Wilm, CA

WILMINGTON COMMUNITY SURVEY

QUESTIONS	ANSWERS (PLEASE CIRCLE)
FLARES	
1. Has there been a burning flare on the Warren site (more than just a light at the top)?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> I don't know
2. In the last month, how often has the flare been burning?	<input type="radio"/> Rarely (once/twice) <input type="radio"/> Sometimes (once/wk) <input type="radio"/> A lot (once/day) <input checked="" type="radio"/> All the time
NOISE	
3. How much has the noise increased in your neighborhood due to the Warren site?	<input type="radio"/> Not much <input type="radio"/> A little <input checked="" type="radio"/> A lot <input type="radio"/> So much that I can't stand it!
4. Have you heard loud noises coming from the site?	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. Between 10 pm and 7 am, Warren is required to maintain quiet time. Do you feel they are doing this?	<input type="radio"/> Yes <input checked="" type="radio"/> No
6. How often has the noise kept you awake at night?	<input type="radio"/> Not much (less than once/month) <input type="radio"/> A little <input type="radio"/> A lot (at least once/wk) <input checked="" type="radio"/> Most nights
ODOR	
7. Have you smelled any strange odors?	<input type="radio"/> Rarely (less than once/month) <input type="radio"/> Sometimes <input type="radio"/> A lot (at least once/wk) <input checked="" type="radio"/> All the time
TRAFFIC	
8. Has truck traffic increased since Warren started operating in 2006?	<input type="radio"/> Not much (one extra truck/month) <input type="radio"/> A little (one extra truck / wk) <input checked="" type="radio"/> A lot (one extra truck/day)

Address: _____

QUESTIONS	ANSWERS (PLEASE CIRCLE)
15. Were you told that Warren obtained a permit to operate over the next 12 years at that site?	Yes <input checked="" type="radio"/> No I don't remember
16. Were you told that truck traffic would increase after operation began?	Yes <input checked="" type="radio"/> No I don't remember
17. Were you told that the Warren operations could increase noise in the neighborhood?	Yes <input checked="" type="radio"/> No I don't remember
18. Did any one representing Warren tell you about any possible health impacts from operations?	Yes <input checked="" type="radio"/> No I don't remember
<u>OPINION / FEELINGS / OTHER EXPERIENCES</u>	
19. Has your opinion regarding the Warren site changed based on your experience since operation began?	<input checked="" type="radio"/> Yes No
a. If yes, in what way?	In a good way <input checked="" type="radio"/> In a bad way
20. Based on your experience with the Warren facility, would you have approved this facility in your community?	Yes <input checked="" type="radio"/> No I don't care
21. In addition to what you've already talked about, what has your experience been living in the neighborhood since activity at the Warren site began?	
<i>Smell, Noise, illness . Extreme Breathing difficulties DR visits</i>	

Interested in more information and/or getting involved:

Name: _____

Address: _____

Tel: _____ E-mail: _____

Estella Jones
Address: 1056 N Cary Ave
Wilm DE 90744

WILMINGTON COMMUNITY SURVEY

QUESTIONS	ANSWERS (PLEASE CIRCLE)
FLARES	
1. Has there been a burning flare on the Warren site (more than just a light at the top)?	Yes No I don't know
<i>Yes</i>	
2. In the last month, how often has the flare been burning?	Rarely (once/twice) Sometimes (once/wk) A lot (once/day) All the time
<i>at least 10 X</i>	
NOISE	
3. How much has the noise increased in your neighborhood due to the Warren site?	Not much A little A lot So much that I can't stand it!
	<i>A lot</i>
4. Have you heard loud noises coming from the site?	Yes No
	<i>Yes</i>
5. Between 10 pm and 7 am, Warren is required to maintain quiet time. Do you feel they are doing this?	Yes No
	<i>No</i>
6. How often has the noise kept you awake at night?	Not much (less than once/month) A little A lot (at least once/wk) Most nights
	<i>Most nights</i>
ODOR	
7. Have you smelled any strange odors?	Rarely (less than once/month) Sometimes A lot (at least once/wk) All the time
	<i>All the time</i>
TRAFFIC	
8. Has truck traffic increased since Warren started operating in 2006?	Not much (one extra truck/month) A little (one extra truck / wk) A lot (one extra truck/day)
	<i>A lot (one extra truck/day)</i>

Address: _____

QUESTIONS	ANSWERS (PLEASE CIRCLE)
15. Were you told that Warren obtained a permit to operate over the next 12 years at that site?	Yes <u>No</u> I don't remember
16. Were you told that truck traffic would increase after operation began?	Yes <u>No</u> I don't remember
17. Were you told that the Warren operations could increase noise in the neighborhood?	Yes <u>No</u> I don't remember
18. Did any one representing Warren tell you about any possible health impacts from operations?	Yes <u>No</u> I don't remember
<u>OPINION / FEELINGS / OTHER EXPERIENCES</u>	
19. Has your opinion regarding the Warren site changed based on your experience since operation began?	<u>Yes</u> No
a. If yes, in what way?	In a good way <u>In a bad way</u>
20. Based on your experience with the Warren facility, would you have approved this facility in your community?	Yes <u>No</u> I don't care
21. In addition to what you've already talked about, what has your experience been living in the neighborhood since activity at the Warren site began?	

*Increasing noise - more dust,
Smells, extensive lung illness
constant coughing - less sleep.*

Interested in more information and/or getting involved:

Name: _____

Address: _____

Tel: _____ E-mail: _____

Address: 830 Lakme Ave
Wilmington CA 90744

WILMINGTON COMMUNITY SURVEY

QUESTIONS	ANSWERS (PLEASE CIRCLE)
FLARES	
1. Has there been a burning flare on the Warren site (more than just a light at the top)?	<input checked="" type="radio"/> Yes No I don't know
2. In the last month, how often has the flare been burning?	Rarely (once/twice) Sometimes (once/wk) <input checked="" type="radio"/> A lot (once/day) All the time
NOISE	
3. How much has the noise increased in your neighborhood due to the Warren site?	Not much A little A lot <input checked="" type="radio"/> So much that I can't stand it
4. Have you heard loud noises coming from the site?	<input checked="" type="radio"/> Yes No
5. Between 10 pm and 7 am, Warren is required to maintain quiet time. Do you feel they are doing this?	Yes <input checked="" type="radio"/> No
6. How often has the noise kept you awake at night?	Not much (less than once/month) A little A lot (at least once/wk) <input checked="" type="radio"/> Most nights
ODOR	
7. Have you smelled any strange odors?	Rarely (less than once/month) Sometimes A lot (at least once/wk) <input checked="" type="radio"/> All the time
TRAFFIC	
8. Has truck traffic increased since Warren started operating in 2006?	Not much (one extra truck/month) A little (one extra truck / wk) <input checked="" type="radio"/> A lot (one extra truck/day)

Address: _____

QUESTIONS	ANSWERS (PLEASE CIRCLE)
15. Were you told that Warren obtained a permit to operate over the next 12 years at that site?	Yes <input checked="" type="radio"/> No I don't remember
16. Were you told that truck traffic would increase after operation began?	Yes <input checked="" type="radio"/> No I don't remember
17. Were you told that the Warren operations could increase noise in the neighborhood?	Yes <input checked="" type="radio"/> No I don't remember
18. Did any one representing Warren tell you about any possible health impacts from operations?	Yes <input checked="" type="radio"/> No I don't remember
OPINION / FEELINGS / OTHER EXPERIENCES	
19. Has your opinion regarding the Warren site changed based on your experience since operation began?	Yes <input checked="" type="radio"/> No
a. If yes, in what way?	In a good way In a bad way
20. Based on your experience with the Warren facility, would you have approved this facility in your community?	Yes <input checked="" type="radio"/> No I don't care
21. In addition to what you've already talked about, what has your experience been living in the neighborhood since activity at the Warren site began?	
The job site across the street, where TIMEC Does their pipe- welding is a very bad eyesore We live right on the other side on Lakme Ave	

Interested in more information and/or getting involved:

Name: Benjamin Cuevas

Address: 836 Lakme Ave Wilmington CA 90744

Tel: (310) 415-1970 E-mail: _____

Address: 1042 Cary Ave
Wilm. CA 90744

WILMINGTON COMMUNITY SURVEY

QUESTIONS	ANSWERS (PLEASE CIRCLE)
FLARES	
1. Has there been a burning flare on the Warren site (more than just a light at the top)?	<input checked="" type="radio"/> Yes No I don't know
2. In the last month, how often has the flare been burning?	Rarely (once/twice) Sometimes (once/wk) <input checked="" type="radio"/> A lot (once/day) All the time
NOISE	
3. How much has the noise increased in your neighborhood due to the Warren site?	Not much A little <input checked="" type="radio"/> A lot So much that I can't stand it!
4. Have you heard loud noises coming from the site?	<input checked="" type="radio"/> Yes No
5. Between 10 pm and 7 am, Warren is required to maintain quiet time. Do you feel they are doing this?	Yes <input checked="" type="radio"/> No
6. How often has the noise kept you awake at night?	Not much (less than once/month) A little A lot (at least once/wk) <input checked="" type="radio"/> Most nights
ODOR	
7. Have you smelled any strange odors?	Rarely (less than once/month) Sometimes <input checked="" type="radio"/> A lot (at least once/wk) All the time
TRAFFIC	
8. Has truck traffic increased since Warren started operating in 2006?	Not much (one extra truck/month) A little (one extra truck / wk) <input checked="" type="radio"/> A lot (one extra truck/day)

Address: 1042 Cary Ave.
Wilm. CA 90744

QUESTIONS

ANSWERS (PLEASE CIRCLE)

15. Were you told that Warren obtained a permit to operate over the next 12 years at that site?

Yes

No Never!

I don't remember

16. Were you told that truck traffic would increase after operation began?

Yes

No

I don't remember

17. Were you told that the Warren operations could increase noise in the neighborhood?

Yes

No

I don't remember

18. Did any one representing Warren tell you about any possible health impacts from operations?

Yes

No

I don't remember

OPINION / FEELINGS / OTHER EXPERIENCES

19. Has your opinion regarding the Warren site changed based on your experience since operation began?

Yes

No

a. If yes, in what way?

In a good way

In a bad way

20. Based on your experience with the Warren facility, would you have approved this facility in your community?

Yes

No

I don't care

21. In addition to what you've already talked about, what has your experience been living in the neighborhood since activity at the Warren site began?

I'm very concerned about health issues.
Explosions?
Dust
Allergies

Interested in more information and/or getting involved:

Name: Norma Torres

Address: 1042 Cary Ave.

Tel. (310) 834-7603 E-mail _____

Address: 830 Lakme Ave

WILMINGTON COMMUNITY SURVEY

QUESTIONS	ANSWERS (PLEASE CIRCLE)
FLARES	
1. Has there been a burning flare on the Warren site (more than just a light at the top)?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> I don't know
2. In the last month, how often has the flare been burning?	<input type="radio"/> Rarely (once/twice) <input type="radio"/> Sometimes (once/wk) <input type="radio"/> A lot (once/day) <input checked="" type="radio"/> All the time
NOISE	
3. How much has the noise increased in your neighborhood due to the Warren site?	<input type="radio"/> Not much <input type="radio"/> A little <input type="radio"/> A lot <input checked="" type="radio"/> So much that I can't stand it!
4. Have you heard loud noises coming from the site?	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. Between 10 pm and 7 am, Warren is required to maintain quiet time. Do you feel they are doing this?	<input type="radio"/> Yes <input checked="" type="radio"/> No
6. How often has the noise kept you awake at night?	<input type="radio"/> Not much (less than once/month) <input type="radio"/> A little <input type="radio"/> A lot (at least once/wk) <input checked="" type="radio"/> Most nights
ODOR	
7. Have you smelled any strange odors?	<input type="radio"/> Rarely (less than once/month) <input type="radio"/> Sometimes <input type="radio"/> A lot (at least once/wk) <input checked="" type="radio"/> All the time
TRAFFIC	
8. Has truck traffic increased since Warren started operating in 2006?	<input type="radio"/> Not much (one extra truck/month) <input type="radio"/> A little (one extra truck / wk) <input checked="" type="radio"/> A lot (one extra truck/day)

Address: _____

QUESTIONS	ANSWERS (PLEASE CIRCLE)
15. Were you told that Warren obtained a permit to operate over the next 12 years at that site?	Yes <u>No</u> I don't remember
16. Were you told that truck traffic would increase after operation began?	Yes <u>No</u> I don't remember
17. Were you told that the Warren operations could increase noise in the neighborhood?	Yes <u>No</u> I don't remember
18. Did any one representing Warren tell you about any possible health impacts from operations?	Yes No I don't remember
<u>OPINION / FEELINGS / OTHER EXPERIENCES</u>	
19. Has your opinion regarding the Warren site changed based on your experience since operation began?	Yes No
a. If yes, in what way?	In a good way <u>In a bad way</u>
20. Based on your experience with the Warren facility, would you have approved this facility in your community?	Yes <u>No</u> I don't care
21. In addition to what you've already talked about, what has your experience been living in the neighborhood since activity at the Warren site began?	
Air Pollution, contamination, odor, and noise.	

Interested in more information and/or getting involved:

Name: Manuel Forras Jr.

Address: 830 Lakme Ave.


Tel: 310 989-0549 E-mail: jpmpr123abc@yahoo.com

Address: 937 BANNING

WILMINGTON COMMUNITY SURVEY

QUESTIONS	ANSWERS (PLEASE CIRCLE)
FLARES	
1. Has there been a burning flare on the Warren site (more than just a light at the top)?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> I don't know
2. In the last month, how often has the flare been burning?	<input type="radio"/> Rarely (once/twice) <input type="radio"/> Sometimes (once/wk) <input type="radio"/> A lot (once/day) <input checked="" type="radio"/> All the time
NOISE	
3. How much has the noise increased in your neighborhood due to the Warren site?	<input type="radio"/> Not much <input type="radio"/> A little <input checked="" type="radio"/> A lot <input type="radio"/> So much that I can't stand it!
4. Have you heard loud noises coming from the site?	<input checked="" type="radio"/> Yes <input checked="" type="radio"/>
5. Between 10 pm and 7 am, Warren is required to maintain quiet time. Do you feel they are doing this?	<input type="radio"/> Yes <input checked="" type="radio"/> No
6. How often has the noise kept you awake at night?	<input type="radio"/> Not much (less than once/month) <input type="radio"/> A little <input type="radio"/> A lot (at least once/wk) <input checked="" type="radio"/> Most nights
ODOR	
7. Have you smelled any strange odors?	<input type="radio"/> Rarely (less than once/month) <input type="radio"/> Sometimes <input type="radio"/> A lot (at least once/wk) <input checked="" type="radio"/> All the time
TRAFFIC	
8. Has truck traffic increased since Warren started operating in 2006?	<input type="radio"/> Not much (one extra truck/month) <input type="radio"/> A little (one extra truck / wk) <input checked="" type="radio"/> A lot (one extra truck/day)

Address: 937 BANNING

QUESTIONS	ANSWERS (PLEASE CIRCLE)
15. Were you told that Warren obtained a permit to operate over the next 12 years at that site?	Yes <input checked="" type="radio"/> No I don't remember
16. Were you told that truck traffic would increase after operation began?	Yes <input checked="" type="radio"/> No I don't remember
17. Were you told that the Warren operations could increase noise in the neighborhood?	Yes <input checked="" type="radio"/> No I don't remember
18. Did any one representing Warren tell you about any possible health impacts from operations?	Yes <input checked="" type="radio"/> No I don't remember
OPINION / FEELINGS / OTHER EXPERIENCES	
19. Has your opinion regarding the Warren site changed based on your experience since operation began?	<input checked="" type="radio"/> Yes No
a. If yes, in what way?	In a good way <input checked="" type="radio"/> In a bad way
20. Based on your experience with the Warren facility, would you have approved this facility in your community?	Yes <input checked="" type="radio"/> No I don't care
21. In addition to what you've already talked about, what has your experience been living in the neighborhood since activity at the Warren site began?	A VERY DIFFERENT NEIGHBORHOOD SINCE WARREN START CONSTRUCTION THERE 

Interested in more information and/or getting involved:

Name: BEATRIZ JIMENEZ

Address: 937 BANNING BLVD. WILMINGTON CA-90744

Tel: 310-830-8394 E-mail: _____

ENCUESTA COMUNITARIA DE WILMINGTON

FREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
QUEMADORES	<input checked="" type="radio"/> Si <input type="radio"/> No <input type="radio"/> No Se
1. ¿Han habido quemadores ardiendo en el sitio de Warren (mas que solo una luz)?	
2. En el ultimo mes, ¿Que tan seguido ha estado ardiendo el quemador?	Raramente (una/dos) Abecés (once/wk) <input checked="" type="radio"/> Mucho (once/día) <input checked="" type="radio"/> Todo el tiempo
RUIDO	
3. ¿Cuanto ruido se ha aumentado en el vecindario debido al sitio Warren?	Casi no Poquito Mucho <input checked="" type="radio"/> Insoportablemente
4. ¿Ha escuchado ruidos fuertes que vengan del sitio Warren?	<input checked="" type="radio"/> Si <input type="radio"/> No
5. Entre los horarios de 10 PM y 7 AM, Warren ha sido ordenado a mantener silencio. ¿Siente que han hecho esto?	<input type="radio"/> Si <input checked="" type="radio"/> No
6. ¿Que tan seguido se ha mantenido despierto/a a causa del ruido por las noches?	No mucho (menos de una/mes) Poco <input checked="" type="radio"/> Mucho (al menos 1x semana) <input checked="" type="radio"/> las noches
OLORES	
7. ¿Ha sentido algún olor raro?	Raramente (menos 1 vez por mes) Abecés <input checked="" type="radio"/> Mucho (1 vez x semana) <input type="radio"/> Todo el tiempo
TRAFICO	
8. ¿Desde que empezó Warren en 2006, Ha visto un aumento en el tráfico de camiones de carga?	No mucho (1 camión extra x mes) <input checked="" type="radio"/> Poco (1 camión extra x semana) <input checked="" type="radio"/> Mucho (1 camión extra x día)
9. ¿Como ha afectado el vecindario?	No mucho Poco <input checked="" type="radio"/> Mucho

Domicilio: _____

PREGUNTAS	RESPUESTAS (FAVOR DE CIRCULAR)
17. ¿Se le aviso que las operaciones en el sitio de Warren aumentarían el ruido en el vecindario?	Si <u>No</u> No recuerdo
18. ¿Algún representante de Warren le aviso de posibles impactos de salud a resultado de las actividades en el sitio?	Si <u>No</u> No recuerdo
<u>OPINION / SENTIMIENTOS / OTRAS EXPERIENCIAS</u>	
19. ¿Ha cambiado su opinión sobre el sitio de Warren, basado en su experiencia desde que empezó a operar?	<u>Si</u> No
a. Si es así, ¿de que forma?	En forma positiva <u>En forma negativa</u>
20. Basado en su experiencia, ¿hubiera aprobado el proyecto en su comunidad?	Si <u>No</u> No le interesa
21. Junto con lo que me acaba de platicar, ¿Cuál ha sido su experiencia viviendo en esta comunidad desde que se empezó la actividad en el sitio Warren?	
muchas alergias, problemas de respiración, dolores de cabeza, tos crónica, falta de sueño	

Si le interesa involucrarse o para recibir mas informacion:

Nombre: Veronica Vasquez

Domicilio: 937 Banning Blvd. Wilmington CA 90744

Tel: (310) 218-6362

Correo Electronico _____

Address: _____

WILMINGTON COMMUNITY SURVEY

QUESTIONS	ANSWERS (PLEASE CIRCLE)
FLARES	
1. Has there been a burning flare on the Warren site (more than just a light at the top)?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> I don't know
2. In the last month, how often has the flare been burning?	<input type="radio"/> Rarely (once/twice) <input type="radio"/> Sometimes (once/wk) <input type="radio"/> A lot (once/day) <input checked="" type="radio"/> All the time
NOISE	
3. How much has the noise increased in your neighborhood due to the Warren site?	<input type="radio"/> Not much <input type="radio"/> A little <input checked="" type="radio"/> A lot <input type="radio"/> So much that I can't stand it!
4. Have you heard loud noises coming from the site?	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. Between 10 pm and 7 am, Warren is required to maintain quiet time. Do you feel they are doing this?	<input type="radio"/> Yes <input checked="" type="radio"/> No
6. How often has the noise kept you awake at night?	<input type="radio"/> Not much (less than once/month) <input type="radio"/> A little <input checked="" type="radio"/> A lot (at least once/wk) <input type="radio"/> Most nights
ODOR	
7. Have you smelled any strange odors?	<input type="radio"/> Rarely (less than once/month) <input type="radio"/> Sometimes <input type="radio"/> A lot (at least once/wk) <input checked="" type="radio"/> All the time
TRAFFIC	
8. Has truck traffic increased since Warren started operating in 2006?	<input type="radio"/> Not much (one extra truck/month) <input type="radio"/> A little (one extra truck / wk) <input checked="" type="radio"/> A lot (one extra truck/day)

Address: _____

QUESTIONS	ANSWERS (PLEASE CIRCLE)
15. Were you told that Warren obtained a permit to operate over the next 12 years at that site?	Yes <input checked="" type="radio"/> No I don't remember
16. Were you told that truck traffic would increase after operation began?	Yes <input checked="" type="radio"/> No I don't remember
17. Were you told that the Warren operations could increase noise in the neighborhood?	Yes <input checked="" type="radio"/> No I don't remember
18. Did any one representing Warren tell you about any possible health impacts from operations?	Yes <input checked="" type="radio"/> No I don't remember
OPINION / FEELINGS / OTHER EXPERIENCES	
19. Has your opinion regarding the Warren site changed based on your experience since operation began?	Yes <input checked="" type="radio"/> No
a. If yes, in what way?	In a good way <input checked="" type="radio"/> In a bad way
20. Based on your experience with the Warren facility, would you have approved this facility in your community?	Yes <input checked="" type="radio"/> No I don't care
21. In addition to what you've already talked about, what has your experience been living in the neighborhood since activity at the Warren site began?	

Lots of dust every morning Lots of
BLACK FILM all over the cars

Interested in more information and/or getting involved:

Name: Antonio Cuevas

Address: 836 LAKE WILMINGTON

Tel: 310-427-9313 E-mail: _____

CA

Address: 723 N BANNING BL
Wilm 90744

WILMINGTON COMMUNITY SURVEY

QUESTIONS	ANSWERS (PLEASE CIRCLE)
FLARES	
1. Has there been a burning flare on the Warren site (more than just a light at the top)?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> I don't know
2. In the last month, how often has the flare been burning?	<input checked="" type="radio"/> Rarely (once/twice) <input type="radio"/> Sometimes (once/wk) <input type="radio"/> A lot (once/day) <input type="radio"/> All the time
NOISE	
3. How much has the noise increased in your neighborhood due to the Warren site?	<input type="radio"/> Not much <input type="radio"/> A little <input type="radio"/> A lot <input checked="" type="radio"/> So much that I can't stand it!
4. Have you heard loud noises coming from the site?	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. Between 10 pm and 7 am, Warren is required to maintain quiet time. Do you feel they are doing this?	<input checked="" type="radio"/> Yes <i>Sometimes</i> <input type="radio"/> No <i>Depends on what time of day</i>
6. How often has the noise kept you awake at night?	<input type="radio"/> Not much (less than once/month) <input type="radio"/> A little <input type="radio"/> A lot (at least once/wk) <input checked="" type="radio"/> Most nights
ODOR	
7. Have you smelled any strange odors?	<input type="radio"/> Rarely (less than once/month) <input type="radio"/> Sometimes <input type="radio"/> A lot (at least once/wk) <input checked="" type="radio"/> All the time *
<i>From LG TRUCKS TO THE CARS IN PARKING LOT NEXT APT THAT STARTS AT 5:30 AM</i>	
TRAFFIC	
8. Has truck traffic increased since Warren started operating in 2006?	<input type="radio"/> Not much (one extra truck/month) <input type="radio"/> A little (one extra truck / wk) <input checked="" type="radio"/> A lot (one extra truck/day)

SINGLE SIDE

Address: _____

QUESTIONS	ANSWERS (PLEASE CIRCLE)
15. Were you told that Warren obtained a permit to operate over the next 12 years at that site?	Yes <input checked="" type="radio"/> No I don't remember
16. Were you told that truck traffic would increase after operation began?	Yes <input checked="" type="radio"/> No I don't remember
17. Were you told that the Warren operations could increase noise in the neighborhood?	Yes <input checked="" type="radio"/> No I don't remember
18. Did any one representing Warren tell you about any possible health impacts from operations?	Yes <input checked="" type="radio"/> No I don't remember
OPINION / FEELINGS / OTHER EXPERIENCES	
19. Has your opinion regarding the Warren site changed based on your experience since operation began?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. If yes, in what way? <i>it TURN IN TO A FACTORY ALLEY</i>	In a good way In a bad way
20. Based on your experience with the Warren facility, would you have approved this facility in your community?	Yes <input checked="" type="radio"/> No I don't care
21. In addition to what you've already talked about, what has your experience been living in the neighborhood since activity at the Warren site began?	
<i>IT NOT A NORMAL PLACE TO LIVE ? ANY MORE</i>	

Interested in more information and/or getting involved:

Name: CALVIN Coleman #3

Address: 923 N BANNING BL WILM CA 96744

Tel: 424 477-5239 E-mail: _____

SECOND DISTRICT
ADVISORY PANEL MEMBER
ANDREW WEISSMAN
COMMENTS

ANDREW N. WEISSMAN

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STUART N. ARKIN
(1915-1975)
ALVIN H. WEISSMAN
(1919-1991)

November 11, 2016

Timothy Stapleton, AICP
Zoning Enforcement West
Department of Regional Planning
320 W. Temple Street Los Angeles, CA 90012

Re: Comments to LA County Oil Well Strike Team Biannual Report #1

Dear Mr. Stapleton:

I am sorry I was unable to attend the advisory committee meeting on 11/9.

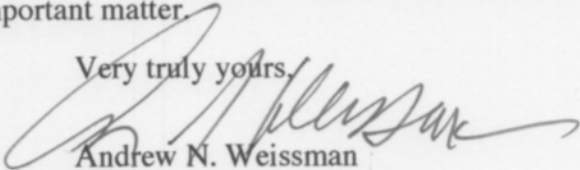
The advisory committee's charge is to assess the bi-annual reports of the Strike Team and to review, comment, and provide input to the Board of Supervisors on the Project results and reports. As pointed out by Member O'Connor, Report No. 1 is merely the start of a much longer process.

In that regard, the report, while adequate in terms of its content, lacks certain elements that I would consider relevant to any assessment of the County's oil and gas facilities, particularly in the area of abandoned/plugged wells and site inspection and maintenance plans for leaking and / or broken equipment. As the former Mayor of a City with active oil field operations located in our jurisdictional boundaries, I know these types of issues are in fact the type that matter the most in terms of ensuring the safety of active operations. I believe added focus on these discrete areas would benefit the county's ongoing review.

While I would support and encourage more review be done in the areas I've referenced above, I confess to some hesitancy about taking on too many new policy proposals in the context of this effort. I would counsel caution about expanding the scope of new issues to review to the point that we water down the overall effort. I am concerned that in expanding the scope, we risk not providing useful information or factual based recommendations. Respectfully, it strikes me that for the outcome of this effort to be effective, any expansion of the scope of the review mandated by the Board should be narrowly tailored to ensure an adequate review can be done in a timely fashion. I think this focused effort is best established after specific consultation and further explicit direction by the Board of Supervisors.

Thank you for the opportunity to provide these comments. I look forward to reviewing the Strike Team's continuing efforts on this important matter.

Very truly yours,


Andrew N. Weissman

bwa

THIRD DISTRICT
ADVISORY PANEL MEMBER
TIMOTHY O'CONNOR
COMMENTS



November 10, 2016

Timothy Stapleton, AICP
Zoning Enforcement West
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

Re: Comments to the LA County Oil Well Strike Team Biannual Report #1

Dear Mr. Stapleton,

As a member of the LA County Oil Well Strike Team Advisory Panel, please accept these comments on the first draft of the biannual report.

Firstly, I commend the LA County Oil Well Strike Team and the Board of Supervisors for taking on the challenging but necessary task of reviewing the zoning codes and permitting processes and taking a close look at oil and gas wells in the area. However, I believe that more can be done to ensure that proper review has been made and to ensure that the County is effectively protecting the health, safety and wellbeing of our communities.

1. Written Adaptive Management Process is Needed

The report is just a start of a longer process, and should be viewed as such. The lessons learned by visiting a certain number of sites should be incorporated into site visits and inspection plans going forward. Unfortunately, while there is a verbal commitment to this, there is nothing in writing that captures this thought process and commitment to adaptive management going forward.

2. Air Emissions and Odors Should be Evaluated During Site Visits

While there is a focus on observing certain types of site characteristics, the lack of any substantive information on air emissions or odors observed by the strike team participants is troubling. This most likely because such information is not included in the well inspection protocol, a notable shortcoming. Without air monitoring or site observational data for air emissions, the report risks being immediately incomplete as to likely community impacts.

The failure of South Coast AQMD to participate in this effort is also discouraging and should be investigated – this may be due to the sporadic issuance of permits to these sites, a fact which should be included in the compliance checklist.

3. Leak Detection and Repair Plans Should Be Reviewed and Disclosed

One of the area's conspicuously absent from the report is information on the site level inspection and maintenance plans for leaking and / or broken equipment. Individual facilities should have site specific leak detection and repair plans – and such plans should be reviewed in the site inspection protocol. We understand from the most recent meeting of the advisory panel that SCAQMD has started to conduct its own site visits. That information was not captured in the last draft of the report. We ask that the date and findings of SCAQMD for each site visit be encapsulated in the report, and we request that SCAQMD continue to be involved in this important process.

4. More Information is Needed on Plugged, Abandoned, and Idle Wells

Another area missing from the report is a discussion of abandoned or plugged wells located on site, and whether the operator has any information on such operations. While there is a focus on idle infrastructure, the information on abandoned wells is lacking.

As it relates to idle wells, the inspection reports do not do a uniform job of reporting whether idle wells have been tested pursuant to the DOGGR well testing requirements, or what the findings of those tests were. While the question of whether there was an idle well test is present on the well inspection checklist, the appendices reports do not actually include this information for idle wells.

5. Resident Complaints Should Be Accounted For and Documented

As to the compliance checklist proposed by the strike team, to actually satisfy the important checkpoint of “neighbor issues and complaint history”, there appears to be much more work needed by the strike team. For example, as it relates to the Termo facility, the community has been complaining of oil and gas operations for years. Not only has the facility been the subject of a multi-year protest by the Porter Ranch community, the facility has resulted in significant amounts of truck traffic and noise. None of this is captured in the summary report, and meetings with impacted neighbors is necessary to acquire necessary information on complaints made by residents.

6. Well Stimulation Operations and Practices Are Missing in the Report

One of the issues that many people have been concerned about is whether well stimulation operations have been occurring at the sites, and whether this creates unsafe conditions. While the well inspection protocol looks at several site characteristics in an individual manner, there doesn't appear to be any holistic assessment of whether well stimulation has, or is planned to occur at the sites. The protocol similarly doesn't evaluate whether high pressure equipment is brought on site to accomplish this, what chemicals / constituent compounds are used to perform such operations, and the origination / volume of water used to conduct it.

Thank you for considering these comments moving forward.

Sincerely,

Timothy O'Connor
Director and Senior Attorney
California Oil and Gas Program
Environmental Defense Fund

FOURTH DISTRICT
ADVISORY PANEL MEMBER
MATT REZVANI
COMMENTS

LA County Oil Well Strike Team Biannual Report #1

Discussion Comments

- ❖ Considering this is the very first report and limited in scope in terms of the number of facilities inspected, it is a bit difficult to completely comment on the report. Particularly considering that the task ahead is much greater than what is in this first report. Having said that, in my opinion, the protocols appear to be very comprehensive, and with the exception of a few indicators it is complete.
- ❖ The areas that may need to be added or expanded for inspection protocols and discussion are well area flow lines, and abandoned wells:
 1. There needs to be a more comprehensive understanding of abandoned wells at each production field, and their abandonment history (i.e. are the wells abandoned according to DOOGR latest requirement). There should also be a discussion on any orphan wells that may exist at the site or proximity of these sites.
 2. Historically, the interconnecting flow lines in many of older production fields have been problematic and a source of oil leaks, sometimes going undetected for a period of time, due to low pressure and presence of water and oil sometimes sitting stagnant in the line, causing corrosion. While hydrotesting or smart pigging of the lines may not be feasible, it would be helpful to gain a better understanding of the condition of those pipelines, their leak history and other criteria. A general discussion of these issues for each field will be helpful.

Matt Rezvani