

DRAFT
Baldwin Hills Community Standards District
Subsection L – Plan Requirements

Plan/Program	CSD Ref.	Pg. #	Due Date	Purpose	Information to be included in the Plan and/or actions required	Review/Inspection	Periodic Review	Lead Agency	Notes
Odor Minimization Plan	L.2.a; E.2.c	80; 12-13	2/25/09	The Odor Minimization Plan shall provide facility information and describe <u>how</u> odors will be minimized, managed and monitored at the facility.	<ol style="list-style-type: none"> Description of potential sources of odor at the oil field. Description of methods/measures to be used for minimizing and controlling odors from all oil field equipment, including production wells; crude oil storage tanks; and bioremediation farms Description of methods/measures to be used for minimizing and controlling odors during drilling, re-drilling and workover operations Procedures/Specifications that address compliance with odor-related CSD requirements, including: <ul style="list-style-type: none"> - Use of gas buster and portable flare to remove any gas encountered during drilling and re-drilling operations (E.2.e) – <i>Plan should specify operational procedure for retaining measurable gas in the wellbore until the gas buster and portable flare are installed on the rig</i> - Installation of oil tank pressure monitoring and venting (E.2.f) - Use of odor suppressants at the biofarms (E.2.g)- <i>Plan should include specification and procedure</i> - Use of odor suppressants on the mud shaker tables during drilling and re-drilling operations (E.2.h) – <i>Plan should include specification and procedure</i> - Use of closed systems for all produced water and oil associated with production, processing, and storage (E.2.i) - <i>Oil and oily water to be processed through the existing water/oil processing and separation facilities or stored in available tank capacity until processing is available; open pits should not be used for temporary holding of oil and oily water</i> Specification of any buffer zones where appropriate Procedures for receiving, recording, replying to, and remediating odor complaints or odor problems at the facility 	<ol style="list-style-type: none"> Odor Minimization Plan submitted to DRP and the ECC ECC reviews for compliance with the CSD DRP refers Plan to SCAQMD for technical consultation on issues including but not limited to: <ul style="list-style-type: none"> -Operating procedure for use of gas buster and portable flare -Oil tank pressure monitoring system -Operating procedure for use of closed systems -Adequacy of odor minimization methods/measures proposed, etc. DRP either approves plan or requests changes 	Annual	DRP	<ul style="list-style-type: none"> -CSD specifies Plan will be reviewed by the director in consultation with SCAQMD (L.2.a; pg. 80) -CSD defines odor suppressant as “an organic emulsifier, or other compound, that is used to eliminate hydrocarbon odors by reducing the organic composition of hydrocarbon materials” (C; pg.7) -CSD requires installation of oil tank pressure monitors and venting on existing oil storage tanks consistent with CSD requirement E.2.f within 180 days of effective date of CSD (due date - 5/26/09) (L.2.c; pg. 81) - CSD requires <u>annual review</u> of the Plan by the operator to determine if any modifications are needed; any modifications must be submitted to the director for review and approval (E.2.c; pg. 12) -Refer to FEIR Mitigation Measures AQ.3-1 to AQ.3-8 (FEIR, pp. 4.2-32 to 4.2.-34)

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					7. Any other relevant information related to compliance with the CSD				
Air Monitoring Plan	L.2.b; E.2.d	80-81 13-15	2/25/09	The Air Monitoring Plan shall describe the monitoring system(s) that will be used to monitor total hydrocarbon vapors and hydrogen sulfide (H2S) at each well drill, re-drilling, and reworking site, and total hydrocarbon vapors at the gas plant.	<p>1. Specify the number, type and location of monitors that will be used to monitor the following:</p> <ul style="list-style-type: none"> -Total hydrocarbon vapors and hydrogen sulfide (H2S) at each well <u>drilling, redrilling and reworking site</u> -Total hydrocarbon vapors at the <u>gas plant</u> <p>2. Schematic showing approximate placement of monitors at drill sites, re-drill sites and reworking sites - FEIR recommends that monitors be installed at the edge of the drill pad (FEIR Mitigation Measure AQ.3-6; pg. 4.2-33)</p> <p>3. Schematic showing location of monitors at the gas plant - FEIR recommends that monitors be installed at the outer edge of the gas plant (FEIR Mitigation Measure AQ.3-6; pg. 4.2-33)</p> <p>4. Procedures and/or specifications that address compliance with CSD requirements, including:</p> <ul style="list-style-type: none"> -Monitors shall provide automatic alarms that are triggered by the detection of hydrogen sulfide (H2S) or total hydrocarbon vapors (E.2.d; pg.13) -Alarm points shall be set at a maximum of 5 and 10 pap for H2S and 500 and 1,000 pap for hydrocarbons, with the higher level requiring shut-down of drilling or gas plant operations and notification to appropriate agencies, including Los Angeles County Fire Department, Culver City Fire Department, office of Emergency Services, and SCAQMD; any corrective actions taken shall be documented in the drilling, redrilling or reworking log, and gas plant log (E.2.d.i – E.2.d.iv; pp. 13 – 15) - For drilling, redrilling and reworking monitors, alarms shall be audible and/or visible to the person operating the drilling, redrilling or reworking equipment (E.2.d; pg.13) -For gas plant monitors, alarms shall be audible and/or visible to the gas plant operator (E.2.d; pg. 	<p>1. Air Monitoring Plan submitted to DRP and the ECC</p> <p>2. ECC reviews for compliance with the CSD</p> <p>3. DRP refers Plan to SCAQMD for technical consultation on issues including but not limited to:</p> <ul style="list-style-type: none"> - Type of monitors specified - Adequacy of number of monitors specified for drilling, re-drilling and re-working sites - Adequacy of number of monitors specified for the gas plant - Reliability of instrumentation and frequency of calibration specified - Adequacy of procedure for responding to alarm events <p>4. DRP refers Plan to the County Fire Department for technical consultation on adequacy of monitors and procedures for responding to alarm events</p> <p>5. DRP either approves plan or requests changes</p>		DRP	<p>-CSD specifies plan will be <u>reviewed by the director</u> in consultation with SCAQMD (L.2.b; pg. 81)</p> <p>-CSD specifies the director shall either approve or provide the operator with a list of deficiencies within 45 days of receipt of plan (L.2.b; pg. 81)</p> <p>-CSD specifies that <u>no approvals for drilling or redrilling may be issued by the County until the Air Monitoring Plan has been approved by the director</u> (L.2.b; pg. 81)</p> <p>-CSD specifies the operator shall provide <u>quarterly reports to the fire chief</u> summarizing all monitoring events where hydrogen sulfide concentration was at five parts per million or higher and the total hydrocarbon concentration was at 500 parts per million or higher (E.2.v; pg. 15)</p> <p>-Refer to FEIR Mitigation Measures AQ.3-6 (FEIR, pg. 4.2-33)</p>

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					<p>13)</p> <p>-All monitoring equipment shall keep a record of the levels of total hydrocarbons and hydrogen sulfide detected at each of the monitors; records shall be retained for a minimum of five years (E.2.d.v; pg.15)</p> <p>5. Procedure for recording drilling, redrilling reworking and gas plant operations (operation logs)</p> <p>6. Procedure for responding to level 1 (5ppm for H2S and 500 pap for hydrocarbons) alarm events</p> <p>7. Procedure for responding to level 2 (10ppm for H2S and 1000 pap for hydrocarbons) alarm events – CSD requires shut-down of operations for level 2 alarm events</p>				
Fugitive Dust Control Plan	L.2.e E.2.p	82 19-20	3/27/09	The Fugitive Dust Control Plan shall describe measures to be taken at the site to minimize/prevent offsite dust impacts and dust impacts to native habitats. The plan shall include mitigations for fugitive dust per SCAQMD Rule 403 and SCAQMD CEQA Guidelines.	<p>1. Describe potential sources of fugitive dust (i.e. disturbed areas, grading, construction, unpaved roads, etc.)</p> <p>2. Describe measures to be used to control fugitive dust emissions from each source addressed in the plan, as applicable and appropriate for the site conditions. Measures shall be consistent with SCAQMD Rule 403 and SCAQMD CEQA Guidelines. Examples of control measures include, but are not limited to:</p> <ul style="list-style-type: none"> - Apply water every 4 hours to the area within 100 feet of a structure being demolished, to reduce vehicle trackout. (36% reduction) - Use a gravel apron, 25 feet long by road width, to reduce mud/dirt trackout from unpaved truck exit routes. (46% reduction) - Apply dust suppressant (e.g., polymer emulsion) to disturbed areas upon completion of demolition. (84% reduction) - Apply water to disturbed soils after demolition is completed or at the end of each day of cleanup. (10% reduction) - Prohibit demolition activities when wind speeds exceed 25 mph. (98% reduction) - Apply water every 3 hours to disturbed areas within a construction site. (61% reduction) - Require minimum soil moisture of 12% for earthmoving by use of a moveable sprinkler system or a water truck. Moisture content can be verified by lab sample or moisture probe. (69% 	<p>1. Fugitive Dust Control Plan submitted to DRP and the ECC</p> <p>2. Refer plan to DPW for comment on adequacy of control measures</p> <p>3. Refer plan to SCAQMD for comment on adequacy of control measures</p> <p>4. If measures include water/soil additives, such as binders, tackifiers, surfactants, and other such materials and methods, refer plan to RWQCB to ensure method meets RWQCB requirements and all applicable federal, state and local environmental regulations regarding the use of the specified material.</p> <p>5. DRP either approves the Plan or requests changes</p>	5 years	DRP	<p>- CSD requires that the plan be reviewed and approved by the director. (E.2.p; pg. 19)</p> <p>- CSD requires review of the Fugitive Dust Control Plan every five years by the operator; any modifications to be reviewed and approved by the director. (E.2.p; pg. 20)</p> <p>- Refer to FEIR Mitigation Measure AQ.1-2 (FEIR, pg. 4.2-25)</p>

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					<p><i>reduction)</i></p> <ul style="list-style-type: none">- <i>Limit on-site vehicle speeds (on unpaved roads) to 15 mph. (57% reduction)</i>- <i>Replace ground cover in disturbed areas as quickly as possible. (5% reduction)</i>- <i>All trucks hauling dirt, sand, soil, or other loose materials are to be tarped with a fabric cover and maintain a freeboard height of 12 inches. (91% reduction)</i>- <i>Install pipe-grid trackout-control device or a gravel bed trackout apron (3 inches deep, 25 feet long, 12 feet wide per lane and edged by rock berm or row of stakes) to reduce mud/dirt trackout from unpaved truck exit routes. (46-80% reduction)</i>- <i>Implement watering twice a day for industrial unpaved roads. (55% reduction)</i>- <i>Require construction of 3-sided enclosures with 50% porosity around storage piles. (75% reduction)</i>- <i>Water storage piles by hand or apply cover when wind events are declared. (90% reduction)</i>- <i>Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days). (up to 80% reduction)</i> <p>3. Procedure for tracking dust control measures (refer to SCAQMD Rule 403 - Sample Record Keeping)</p>				