



Fugitive Dust Control Plan Inglewood Oil Field

Baldwin Hills CSD Condition

Title 22, Division 10, Chapter 22.310,
Section 040.16; Section 120.B.5

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1.0 INTRODUCTION

1.1 Background

Sentinel Peak Resources California LLC (Operator) operates the Inglewood Oil Field (IOF) in the Baldwin Hills zoned District of Los Angeles County. The IOF, which covers approximately 1,000 acres, is surrounded by single and multiple family dwellings as well as recreational, institutional, commercial, and industrial uses. To address issues of land use compatibility with surrounding land uses, the Los Angeles County Board of Supervisors recently adopted the Baldwin Hills Community Standards District (CSD) to provide a means of implementing regulations, safeguards, and controls for activities related to drilling for and producing oil and gas within the Inglewood Oil Field.

The Baldwin Hills Community Standards District (CSD) Title 22, Division 10, Chapter 22.310, Section 040, item 16 states,

“The operator shall comply with the provisions of a fugitive dust control plan that has been approved by the director. The plan shall be based upon the requirements of SCAQMD Rule 403 and the SCAQMD CEQA Guideline Fugitive Dust Control Measures. The fugitive dust control plan shall be reviewed by the operator every five years to determine if modifications to the plan are required. Any modifications to the fugitive dust control plan shall be submitted to the director for review and approval. The fugitive dust control plan shall include any measured requested by the director.”

In addition, the implementation of the Fugitive Dust Control Plan is dictated by CSD Section 120.B.5:

“Within 120 days following the effective date, or at such later date as may be approved by the director for good cause shown, the operator shall develop and deliver for review and approval a fugitive dust control plan as specified in subsection E.2.p. The operator shall take such actions as may be necessary for the plan to be approved by the director.”

1.2 Purpose of the Fugitive Dust Control Plan

The purpose of the Fugitive Dust Control Plan is to identify methods or control measures the Operator will employ to prevent, reduce, mitigate and control the entrainment of airborne fugitive dust as a result of fugitive dust activities occurring within the IOF. This Fugitive Dust Control Plan will ensure that dust suppression techniques are implemented to control potential fugitive dust emissions sources during operator operations and activities.

The Fugitive Dust Control Plan will serve to minimize fugitive dust emissions from potential future oil field activities and prevent impacts to air quality, biological resources, and visual resources of the surrounding communities (as identified in the Baldwin Hills Final Environmental Impact Report).

2.0 POTENTIAL DUST GENERATING ACTIVITIES

Current oil field operations include the extraction of oil and gas from subsurface reservoirs, processing of the crude oil to remove water, and processing the gas to remove water and gas

liquids. Possible dust generating activities include: on-site vehicle traffic, grading, excavation, back-filling, road repair, and demolition activities, all of which have the potential to generate airborne fugitive dust and track-out and roadway dirt onto public roadways.

3.0 FUGITIVE DUST CONTROL MEASURES

To proactively reduce the amount of fugitive dust generated from oil field activities, the Operator will select and implement from the following control mitigation measures in the Final Environmental Impact Report (EIR) for the Baldwin Hills CSD and maintain compliance with AQMD Rule 403, when and where appropriate:

- Limit on-site vehicle speeds (on unpaved roads) to 15 mph, indicated by posting of speed signs and training.
- Implement watering with a water truck at least once daily and more frequently as conditions require, for traveled industrial unpaved roads to achieve visibly moist condition to prevent fugitive dust emissions from vehicular traffic and maintain a stabilized surface.
- Limit vehicular travel to established unpaved roads (haul routes) and unpaved parking lots to prevent visible fugitive dust emissions. Stabilize soils of unpaved roads and parking lots to minimize fugitive dust emissions with water or dust suppressants as needed.
- Stabilize all storage piles or maintain visibly moist at all times or maintain a crust. Apply additional water to soil storage piles as needed or apply secured cover (such as plastic sheeting, tarps, or another similar cover typically used for dust control from soil piles) when winds are expected to exceed 25 mph per the Operator's meteorological station data.
- Stabilize (maintain visibly moist or form a crust) stockpiled materials and storage piles to avoid steep sides or faces. Stockpiles within 100 yards of off-site occupied buildings will not be greater than eight feet in height; or must have a road bladed to the top to allow water trucks access or must have an operational water irrigation system that is capable of complete stockpile coverage. Add or remove material from the downwind portion of the storage pile so the disturbed portion of the pile is not affected by the wind creating fugitive dust.
- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).
- For truck loading, pre-water material prior to loading to prevent fugitive dust emissions and ensure that freeboard exceeds twelve inches (CVC 23114). Empty loader bucket such that no visible dust plumes are created and ensure that the loader bucket is at a close and reasonable safe distance to the truck to minimize drop height.
- When clearing and grubbing, stabilize soil prior to, during and immediately after clearing and grubbing activities by applying sufficient water to prevent fugitive dust and maintaining live perennial vegetation where possible.
- When cutting and filling, pre-water soil (prior to and stabilize during and after cut and fill activities to prevent fugitive dust. For large sites (defined in AQMD Rule 403, and form 403N), pre-water with sprinklers or water trucks and allow time for penetration.

- When backfilling, mix backfill soil with water prior to moving, dedicate a water truck or high-capacity hose to backfilling equipment, minimize drop height from loader bucket and empty loader bucket slowly so that no fugitive dust plumes are generated.
- Tarp all trucks hauling dirt, sand, soil, or other loose materials with a fabric cover and maintain a freeboard height of 12 inches prior to leaving the site to prevent fugitive dust.
- Install and maintain a pipe-grid track-out-control device or a gravel bed track-out 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 track-out from extending more than 25 feet from each unpaved vehicle egress/exit routes.
- Maintain a minimum soil moisture of 12% for earthmoving by use of a moveable sprinkler system or a water truck (to prevent fugitive dust emissions). Moisture content will be verified by lab sample or moisture probe.
- For earth-moving activities, pre-apply water to soil to stabilize to maintain soil in a damp condition and to ensure that visible dust emissions do not exceed 100 feet in any direction or cross property line. For construction projects, grade each project phase separately, timed to coincide with construction phase. Upwind fencing can be used to prevent material movement on site.
- Apply water every three (3) hours to disturbed surface areas within a construction site and at the end of each workday to prevent fugitive dust.
- Stabilize disturbed soil throughout the construction site and between structures by watering, limiting vehicular traffic through those areas and minimization of disturbances on soils where possible to prevent fugitive dust emissions.
- Limit construction projects or schedule them to the extent possible, such that they are not concurrent to prevent grading at multiple locations.
- For trenching, pre-water material prior to trenching to prevent fugitive dust. For deep trenching activities, pre-trench to 18" soak soils via the pre-trench and resume trenching. At the conclusion of the activity water and maintain visibly moist to prevent fugitive dust emissions.
- During landscaping, stabilize soils, materials, and slopes by applying water, maintaining materials in a crusted condition and maintaining effective cover over materials to prevent fugitive dust. Also, stabilize sloping surfaces using soil binders or other alternatives, such as non-vegetative stabilization including but not limited to degradable mulches, geotextile, and mats, until vegetation or ground cover can effectively stabilize the slopes and hydro-seed prior to rain season to prevent fugitive dust emissions.
- Prohibit demolition activities when wind speeds exceed 25 mph.
- During mechanical or manual demolition, stabilize wind erodible surfaces, surface soil where support equipment and vehicles will operate and loose soil and demolition debris by applying sufficient water to prevent the generation of visible dust plumes.
- Apply water every four hours to the area within 100 feet of a structure being demolished.

- During demolition, apply water to disturbed soils after demolition is completed or at the end of each day of cleanup.
- Apply dust suppressants (e.g., polymer emulsion) to disturbed areas upon completion of demolition.
- Replace ground cover in disturbed areas as quickly as possible.
- For crushing, stabilize soils prior to operation of support equipment and stabilize material after crushing by applying water to prevent fugitive dust emissions.
- Once sign plan is approved by the County, install contact signage consistent with existing County approved signs and AQMD Rule 403.

4.0 POTENTIAL ADDITIONAL IMPLEMENTATION STEPS

The AQMD and Los Angeles County Department of Regional Planning (County) shall review the initial Fugitive Dust Control Plan, and the County will be responsible for approval, monitoring and enforcement.

PXP will review the plan every 5 years to determine if modifications to the plan are required and re-submit to the County for approval if modifications are made.

4.1 Dust Control Personnel Training

Appropriate PXP staff will complete and pass the Controlling Dust in the South Coast Air Basin (Rule 403) class. Prior to the construction of new facilities and drilling pad construction projects, PXP will conduct an employee and contractor Awareness Training which will include all applicable AQMD approved dust control measures and the importance of strict compliance. PXP's Environmental Health & Safety (EH&S) staff will document, record, and maintain records of these training events and will conduct internal inspections to ensure that the appropriate dust control measures are being properly implemented.

4.2 Compliance Checklists

Prior to construction of new facilities and drilling pad construction projects, the site foreman will assign personnel to evaluate implementation of the approved Fugitive Dust Control Plan Measures. The foreman will check off the items on the Field Foreman's Dust Mitigation Check List prior to executing the project. The assigned personnel – Monitor (who may have other responsibilities) – will be responsible to check off the required measures on the daily log, depending on the size of the project, and measures applicability. (The identified log may be incorporated into other construction logs and may not need to be a stand-alone document.)

The Monitor will report any activities of noncompliance or questionable compliance to the site Foreman as soon as possible so that these situations can be immediately addressed.

4.3 PXP Ombudsperson(s)

In accordance with the CSD, PXP will also designate employees or authorized agents to serve as Ombudspersons to respond to questions and concerns from the public relating to oil field operations, including dust complaints. The Ombudsperson will be familiar with all the provisions

of the CSD, and all conditions of approval related to permits and approvals issued by the County or other agencies. The Ombudsperson will also be responsible for facilitating, to the extent feasible, the prompt resolution of any issues that may arise relating to compliance matters or impacts to the surrounding communities resulting from oil field operations.