

Santa Barbara County Air Pollution Control District
Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities
Rule 331 LDAR Exemptions – Exempt Components that are Subject to the CARB GHG O&G Regulation

SBCAPCD RULE 331 Exemptions	Does CARB GHG O&G Regulation Apply?	COMMENTS
<p><i>Section A – Applicability.</i> Rule applies to components in liquid or gaseous hydrocarbon service at refineries, chemical plants, oil and gas production fields, oil and gas processing plants, and pipeline transfer stations.</p>	<p>No, except for components exempt under Rule 331. Also, the CARB regulation applies to natural gas underground storage facilities; natural gas gathering and boosting stations (that not subject to Rule 331); and, natural gas transmission compressor stations.</p>	<p>For those facilities that are not “subject” to Rule 331 under the Applicability Section, the LDAR requirements of the CARB regulation become effective on January 1, 2018. For those components exempt from Rule 331 due to the provisions of Section B, the CARB regulation will apply. In some cases, the CARB regulation will have a similar exemption to the Rule 331 exemption.</p>
<p><i>Section B.1 – Exemptions.</i> All exemptions requests must be in writing to the Control Officer.</p>	<p>No. The CARB regulation has no similar requirement.</p>	<p>Exemptions from provisions of Rule 331 (in whole or part) are made in writing and are incorporated into the facility’s Inspection & Maintenance Plan. A facility may retract a previously approved exemption request (in whole or in part) if done, prior to January 1, 2018, in writing and with an update to the I&M Plan that incorporates that request. The District recommends this approach as it avoids having to implement two separate LDAR programs at the same facility.</p>
<p><i>Section B.2.a – Exemptions.</i> Components exclusively handling natural gas. This exemption applies to all rule provisions.</p>	<p>Yes. The CARB regulation applies.</p>	<p>The CARB regulations does have a limited exemption under §95669(b)(4) for natural gas distribution pipelines located at a crude oil production facility used for the delivery of commercial quality natural gas and which are <u>not owned or operated</u> by the crude oil production facility. Otherwise, these</p>

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		components must comply with the CARB regulation. ¹
<i>Section B.2.b – Exemptions.</i> Components buried below ground. This exemption applies to all rule provisions.	Yes. However, the CARB regulation contains a similar exemption to Rule 331.	§95669(b)(5) exempts: “Components that are buried below ground. The portion of well casing that is visible above ground is not considered a buried component.” District LDAR already applies to the portion of the well casing visible above ground. No additional action is required to comply with the CARB regulation.
<i>Section B.2.c – Exemptions.</i> One-half inch and smaller stainless steel tube fittings which have been determined to be leak-free by the Control Officer based on an initial inspection in accordance with Section H.1. This exemption applies to all rule provisions.	Yes. However, the CARB regulation contains a similar exemption to Rule 331.	CARB’s §95669(b)(7) also exempts ½ inch stainless steel tube fitting. CARB has confirmed that the District exemption matches the intent of the CARB exemption and no additional action is required to comply with the CARB regulation.
<i>Section B.3.a – Exemptions.</i> Components exclusively in heavy liquid service. This exception applies to the provisions of Sections F.1, F.2, F.3 and F.7.	Yes. However, the CARB regulation contains a similar exemption to Rule 331 for crude oil.	The Rule 331 definition of Heavy Liquid service is not the same as the CARB regulation in §95669(b)(2). If the CARB definition (API gravity being less the 20°) is met, then no additional action is required to comply with the CARB regulation.
<i>Section B.3.b – Exemptions.</i> Components, except components within gas processing plants, exclusively handling liquid and gaseous process fluids with an ROC concentration of 10 percent or	Yes	The CARB regulation does not contain a similar exemption. ¹

¹ A facility may retract (in whole or in part) a previously approved exemption request if done, prior to January 1, 2018, in writing and with an update to the I&M Plan that incorporates that request. The District recommends this approach as it avoids having to implement two separate LDAR programs at the same facility. This would include Sections B.2.a, B.3.b, B.3.c, and B.3.e. The Section B.2.a may still exempt natural gas distribution pipelines located at a crude oil production facility used for the delivery of commercial quality natural gas and that are not owned or operated by the crude oil production facility. The Section B.3.b exemption may still exempt components incorporated into produced water lines located downstream of a separator and tank system that is controlled with the use of a vapor collection system.

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less by weight, as determined according to test methods specified in Section H.2. This exemption applies to the provisions of Sections F.1, F.2, F.3 and F.7.		The Section B.3.b exemption may still exempt components incorporated into produced water lines located downstream of a separator and tank system that is controlled with the use of a vapor collection system.
<i>Section B.3.c – Exemptions.</i> Components totally contained or enclosed such that there are no ROC emissions into the atmosphere. This exemption applies to the provisions of Sections F.1, F.2, F.3 and F.7.	Yes	The CARB regulation does not contain a similar exemption. Under District LDAR program, examples of these components would be compressor seals/rod packings that are enclosed and connected to a VCS. And any system routed to a VCS is in compliance with the CARB regulation. ¹
<i>Section B.3.d – Exemptions.</i> Components incorporated in lines operating exclusively under negative pressures. This exemption applies to the provisions of Sections F.1, F.2, F.3 and F.7.	Yes. However, the CARB regulation contains a similar exemption to Rule 331.	§95669(b)(8) in the CARB regulation matches. No additional action is required to comply with the CARB regulation.
<i>Section B.3.e – Exemptions.</i> Any control valve actuation system, except those used in pressure relief valves and stuffing boxes, which uses gas pressure to open or close the valve and which releases gas to the atmosphere during this process, and for which the Control Officer has determined on a case-by-case basis that no alternate valve design can be feasibly used. This exemption applies to the provisions of Sections F.1, F.2, F.3 and F.7.	Yes	The CARB regulation does not contain a similar exemption. ¹
<i>Section B.4 – Exemptions.</i> The provisions of Sections F.1, F.2, and F.7 of this rule shall not apply to components that are unsafe to monitor, as documented and established in a safety manual or policy, and with the prior written approval of the Control Officer.	No	Section F.3 of Rule 331 has an applicable monitoring requirement for components that are classified as unsafe-to-monitor. No additional action is required to comply with the CARB regulation.