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January 10, 2018

Mr. William Burke, Chairman
Governing Board
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Dear Chairman Burke:¹

The Porter Ranch Neighborhood Council (PRNC) is gravely concerned about the continued releases of gas and other chemicals from the Aliso Canyon Gas Facility by the Southern California Gas Company (SoCalGas). Our concerns are not only about the occurrence of these releases, but also about the apparent acceptance of these releases by SoCalGas as part of routine business at the facility, as well as their misleading and baseless statements to the public about the impact of these releases on their health. With this letter, the PRNC is requesting that the SCAQMD exercise its authority to rectify this problem.

On December 1 and December 18, there were two reportable releases of gas at the Aliso Canyon facility (see attached notifications). The reporting of these releases to the community were required by the SCAQMD abatement order settlement. However, we wish to bring to your attention a number of concerns we have about these releases and the contents of these notifications:

1. The release of December 1 was reported as "*...planned venting associated with maintenance work...*". We are alarmed at the notion that this release of gas, which amounted to a reportable release, was actually an intentional venting during routine work. We assume that SCAQMD's intent was to minimize, if not stop, releases of nuisance and/or harmful chemicals into the atmosphere, which supposes that an effort is actually in place to prevent them. Yet, SoCalGas' attitude seems to simply be that they can (and do) release such chemicals into the air in the course of their routine operation without any apparent attempt to contain it.
2. The notifications state that these releases "*...do not present a health or safety risk to the community.*" We believe this is a misleading statement to the public because neither SoCalGas nor, to our knowledge, SCAQMD, has proven that the gas and its contents have no adverse health effect. Until such a determination is made and accepted to SCAQMD, such a statement should not be allowed in a public notification requirement.
3. The community notification requirement is based on the occurrence of a Reportable Release, which is quantified based on measurements made using the fenceline monitoring system installed by SoCalGas under a settlement agreement with Los Angeles County. However, this monitoring system was required to be in place for only three years from the date of the settlement, which was signed in 2016. Therefore, sometime in 2019, SoCalGas

¹ This letter represents the opinion of the PRNC, and not necessarily that of the City of Los Angeles.

will be under no obligation to maintain the system. When they do remove the system, they will no longer have the measurements required to quantify the reportable release as required by SCAQMD.

Due to the concerns listed above, we ask the SCAQMD to exercise its regulatory and permitting authority to require the following:

1. We ask that the SCAQMD mandate that the fenceline monitoring system remain in place as long as gas is stored and/or processed at the facility.
2. We ask that the SCAQMD staff, or an independent contractor retained by SCAQMD, take over the maintenance and quality control of the monitors, as well as the automatic data acquisition from the monitors and public access to them to ensure the integrity of the results reported by them.
3. We ask that SCAQMD require SoCalGas to remove the misleading statement regarding the health and safety impact from the community notification.
4. We ask that SCAQMD impose a penalty system designed to incentivize SoCalGas to do everything it can to contain the gas and prevent its release into the environment. Specifically, we ask that a monetary penalty be imposed on each "ppm-minute" release volume measured at each monitor above the reportable release concentration threshold of 10 ppm. For example, if the concentration goes to 11 ppm for one minute, 12 ppm for 3 minutes, and then down to 11 ppm for one minute, then the total volume is calculated as 8 ppm-minutes.² If the penalty rate is set at \$10,000/ppm-minute (as an example), then the total penalty for that event is \$80,000.
5. We ask that any penalty collected as discussed above be deposited in a health-study fund set up by SCAQMD to supplement the \$1M allocation to the health study agreed to by SCAQMD and SoCalGas in the settlement agreement.

We believe that the above items are the right thing to do for a community that has been –and continues to be– so negatively impacted by this harmful facility. We look forward to receiving your response, and we hope to work with your staff on implementing these measures.

Sincerely,
Porter Ranch Neighborhood Council



Issam Najm, Ph.D., P.E.
President

Encl: Community Notification, December 1, 2017
Community Notification, December 18, 2017

cc: Mr. Richard Corey, Executive Director, California Air Resources Board
Mr. Timothy Sullivan, Executive Director, CPUC
Ms. Kathryn Barger, Los Angeles County Supervisor
Mr. Angelo Bellomo, Los Angeles County Department of Public Health
Mr. Mitchell Englander, Los Angeles City Councilman

² Calculated as: $(11-10) \times 1 + (12-10) \times 3 + (11-10) \times 1 = 8$ ppm-minutes

From: **SoCalGas** webmaster@socalgas.messages2.com
Subject: Community Notification - Aliso Canyon
Date: December 1, 2017 at 11:03 PM
To: board@prnc.org



This message contains graphics. If you do not see the graphics, [click here to view](#).

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Community Notification - Aliso Canyon

Dear North San Fernando Valley community member:

This is to provide you with information about an elevated reading observed tonight on the fence-line monitors at the Aliso Canyon natural gas storage facility. Earlier this evening, SoCalGas operators noted an increase in methane levels on two fence-line monitors along the border with the community.

The brief elevated methane levels lasted about 20 minutes and do not present a health or safety risk to the community. These elevated readings are related to planned venting associated with maintenance work being conducted at the facility. The maintenance is part of the final stages of a project to upgrade the compressors at the facility. SoCalGas has also provided notifications to the relevant state and local agencies.

For the latest news and information about Aliso Canyon or to sign up for our community notification program, visit socalgas.com/alisoupdates.

Make sure you receive our emails by adding webmaster@socalgas.messages2.com to your address book. Please do not reply to this email. Email sent to this address cannot be answered. For assistance, please visit our [Help Center](#). Southern California Gas Company values your privacy. For more information, view our [Privacy Policy](#) and [Privacy Notice](#).

Sender's business address is 555 West Fifth Street, GT20B2, Los Angeles, CA 90013.

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Community Notification - December 01, 2017

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Community Notification - Aliso Canyon

Dear North San Fernando Valley community member:

This evening at approximately 4:55 p.m., there was an unplanned release of natural gas at the Aliso Canyon Natural Gas Storage Facility.

The release occurred during a routine operation to pressurize equipment following maintenance. The equipment is used in the dehydration process that removes water from natural gas. A flange gasket on the equipment did not function properly resulting in the release.

Immediate actions were taken to control the release, and it was stopped within approximately 50 minutes. The release did not present a health or safety risk to the community. However, the odor may have been noticeable to people near the facility.

In addition, the release was detected on the fence-line monitoring system along the border with the community. The highest reading on the fence-line monitors was approximately 66 parts per million. Since the release was stopped those readings have returned to normal levels. The online portal that allows community members to view data from the fence-line monitoring system is currently off-line. SoCalGas is troubleshooting the cause of the website outage.

SoCalGas has notified the appropriate state and local agencies about the release.

For the latest news and information about Aliso Canyon or to sign up for our community notification program, visit socalgas.com/alisoupdates.

Make sure you receive our emails by adding webmaster@socalgas.messages2.com to your address book. Please do not reply to this email. Email sent to this address cannot be answered. For assistance, please visit our [Help Center](#). Southern California Gas Company values your privacy. For more information, view our [Privacy Policy](#) and [Privacy Notice](#).

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