

January 28, 2021

Ms. Melinda Hicks
Kern Oil & Refining Co.
7724 E Panama Ln
Bakersfield, CA 93307

**Re: Final Approval of Petroleum Refinery Fence-Line Air Monitoring Plan
Facility Number: S-37**

Dear Ms. Hicks:

The San Joaquin Valley Air Pollution Control District (District) has received and reviewed the submitted petroleum refinery fence-line air monitoring plan for Kern Oil & Refining Co. dated June 29, 2020. Pursuant to Section 8.2 of Rule 4460 (Petroleum Refinery Fence-line Air Monitoring), the public was provided a thirty (30) day review and comment period from August 13, 2020 through September 14, 2020.

The purpose of this letter is to inform you that subsequent to this review period, the District has determined that the submitted air monitoring plan satisfies the requirements of Section 6.0 of District Rule 4460. Pursuant to Section 7.1 of Rule 4460, Kern Oil & Refining Co. is now required to complete the installation and begin the operation of its planned real-time fence-line air monitoring system within 365 calendar days from the date of this approval letter.

If you have any questions, please contact Mr. Chay Thao, Program Manager, at chay.thao@valleyair.org or (559) 230-5895.

Sincerely,



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Kern Fenceline Monitoring Plan for Rule 4460



Monitoring Plan Prepared for the
San Joaquin Valley Air Pollution Control District
Bakersfield, CA

June 29, 2020

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Kern Fenceline Monitoring Plan for Rule 4460

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Monitoring Plan

June 29, 2020

Contents

Figures.....iv

Tables.....v

1. Rule 4460 Summary 1

 1.1 Summary of Kern Oil & Refining Co..... 2

 1.2 Summary of Monitoring Plan for Kern Oil Refinery..... 4

2. Summary of the Monitoring Network and Reporting System..... 7

3. Local Topography, Meteorology, Local Communities and Sensitive Receptors..... 11

 3.1 Topography and Meteorology 11

 3.2 Community and Sensitive Receptors..... 17

4. Details of Proposed Instruments 19

 4.1 Instrument Specifications 19

 4.2 Pollutant Detection Limits..... 20

5. Operations and Maintenance 23

 5.1 UV-DOAS..... 23

 5.2 UV Fluorescence Analyzer 24

 5.3 Meteorological and Visibility Sensors..... 25

 5.4 Additional Maintenance and Failure Activities..... 26

6. Data Quality 27

 6.1 Data Quality Objectives and Criteria 27

 6.2 Data Quality Control Overview 27

 6.2.1 QC1 – Automated Quality Control..... 28

 6.2.2 QC2 – Daily Checks by Analyst..... 29

 6.2.3 QC3 – Quarterly Review and Reporting..... 30

 6.3 Independent Quality Oversight 31

 6.4 Quality Assurance Project Plan 31

 6.5 SOPs for Equipment..... 31

7. Public Data Display 33

8. Notification System 35

9. Implementation Elements and Schedule 37

Appendix A. Draft Quality Assurance Project Plan 39

Figures

1. Location of Kern facility and surrounding communities.....	3
2. Map of the Kern facility showing the general layout	4
3. Monitoring paths for the Kern refinery in relation to the refinery equipment and property boundary.....	6
4. Locations of monitors covering the important fencelines around Kern.....	7
5. Annual (December 2016 through November 2019) wind rose for Bakersfield Municipal Airport.....	13
6. Winter (December through February) 2017-2019 wind rose for Bakersfield Municipal Airport.....	14
7. Spring (March through May) 2017-2019 wind rose for Bakersfield Municipal Airport.....	15
8. Summer (June through August) 2017-2019 wind rose for Bakersfield Municipal Airport.....	16
9. Fall (September through November) 2017-2019 wind rose for Bakersfield Municipal Airport.....	17
10. Locations of sensitive receptors near the Kern Refinery.....	18
11. Schematic of an open-path monitoring system, depicting two types of path-integrated plumes measuring the gas concentration.....	20
12. Example of a non-public field operations website used for daily review of open-path instrument operations.....	29
13. Example of a public data display of fenceline air monitoring data	34

Tables

1. A summary of reported emissions that contain Rule 4460 compounds.....	4
2. General monitoring locations including path lengths.....	8
3. Specific monitor locations.....	8
4. Instrument specifications and the detection limit for each of the analyzer’s detection methods compared to OEHHA health benchmarks.....	21
5. Schedule of maintenance activities for the UV-DOAS.....	24
6. Schedule of maintenance activities for an H ₂ S UV Fluorescence Analyzer.....	25
7. Schedule of maintenance activities for the meteorological tower.....	25
8. Typical schedule of maintenance activities for the visibility sensor.....	26
9. Performance criteria for the fenceline monitoring systems.....	28
10. Thresholds for triggering automated notifications.....	35
11. Approximate implementation schedule for Kern Rule 4460 monitoring project.....	37

1. Rule 4460 Summary

On December 19, 2019, the San Joaquin Valley Air Pollution Control District (SVAPCD or District) adopted Rule 4460, "Petroleum Refinery Fenceline Air Monitoring."¹ Rule 4460 requires petroleum refineries within the District to establish measurement systems at the fenceline of their facility (at or near the property boundary) and provide real-time air quality information to the public and to the District. Data must be collected by the monitoring systems in accordance with an approved fenceline monitoring plan (this document) that follows District guidelines.

According to Rule 4460, the monitoring plan must provide detailed information on several elements to justify the measurement and data dissemination approach. Section numbers in the following list indicate where each element is discussed in this plan.

- A summary of fenceline air monitoring instruments that are proposed to continuously measure, record, and report air pollutant levels in real-time near the petroleum refinery facility perimeter (i.e., fenceline) (Section 2). *This plan relies on multiple open-path and point instruments to satisfy Rule 4460 requirements.*
- A plan for monitoring pollutants based on an evaluation of routine emission sources at the refinery (Section 1). *Given the refinery capacity and emissions, the Kern Oil Refinery will monitor all required pollutants including sulfur dioxide, hydrogen sulfide, and BTEX compounds (benzene, toluene, ethylbenzene, and xylenes).*
- A summary of equipment used to measure and continuously log wind speed and wind direction data within the facility boundaries (Sections 2 and 4).
- Proposed monitoring equipment siting and selected pathways for fenceline instruments, including the justification for selecting specific locations (Section 2). *This plan covers paths along the important refinery fencelines and has accounted for the measurement of all chemical species listed in Rule 4460 for a facility with a permitted capacity less than 40,000 barrels per day (bpd).*
- Procedures for maintenance of all fenceline monitoring equipment. These procedures include: routine maintenance requirements and timelines of periodic maintenance; length of monitoring equipment downtime during maintenance (when equipment is not operational); and temporary air monitoring measures that will be implemented should equipment fail and be used until normal operating conditions are restored (Section 5).
- Procedures for implementing quality assurance including independent audits of the fenceline monitoring system (Section 6 and Appendix A). *This plan includes a detailed draft Quality Assurance Project Plan (QAPP).*

¹ San Joaquin Valley Air Pollution Control District (2019) Rule 4460: Petroleum refinery fenceline air monitoring. Final rule adopted December 19, 2019. Available at <https://www.valleyair.org/rules/currnrules/4460.pdf>.

- Methods for the distribution of data collected by the fence line monitoring system to the public, local response agencies, as well as the District. (Sections 7 and 8). *This plan provides the key content of a web system for disseminating information as well as an email-based public notification system.*

1.1 Summary of Kern Oil & Refining Co.

Kern Oil & Refining Co. (Kern) is an independent oil refining and marketing company located at 7724 E. Panama Lane, Bakersfield, CA 93307. As shown in [Figure 1](#), the area within several miles of Kern is flat, mostly agricultural land, with two main rural, residential communities of Lamont and Fuller Acres located to the south and northeast of Kern, respectively. This area of the Central Valley often has winds flowing from the northwest and less often flowing from the southeast; other flow directions are much less frequent.

Kern is an important producer and supplier of California-approved gasoline and diesel fuel. Kern employs about 155 people and is committed to providing a safe working environment while working diligently to provide cleaner fuels. Kern's crude oil refining capacity is approximately 26,000 bpd. Kern processes light, sweet crude oil, which is low in sulfur. In addition, it produces renewable diesel from biomass, and blends additional volumes of biodiesel. It also produces an intermediate fuel oil stream, and a small quantity of sulfur as a co-product.

The facility layout with major process and storage areas is shown in [Figure 2](#). There is no residence immediately adjacent to any of the facility process or storage areas. The main process area is located in the north-central area of the facility. Storage tanks are located on the west side of the facility (product storage tanks are in the areas labeled 12 and 13 in [Figure 2](#)), just across Weedpatch Hwy on the east side of the facility (crude oil storage tanks are in the area labeled 1 in [Figure 2](#)), and in the central area of the facility.

Because Kern's refining capacity is less than 40,000 bpd, it will monitor all required pollutants for that production capacity including sulfur dioxide (SO₂), hydrogen sulfide (H₂S), and BTEX. A summary of emissions that contain these compounds is provided in [Table 1](#).

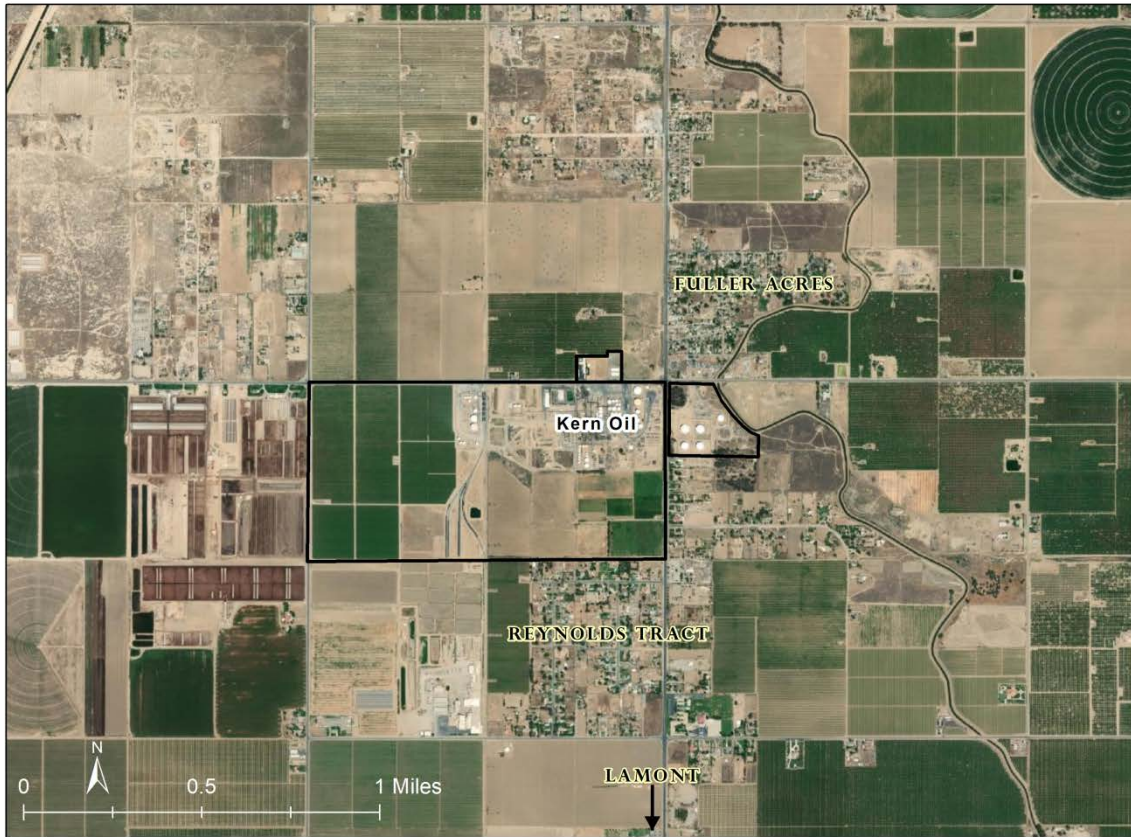


Figure 1. Location of Kern facility and surrounding communities.

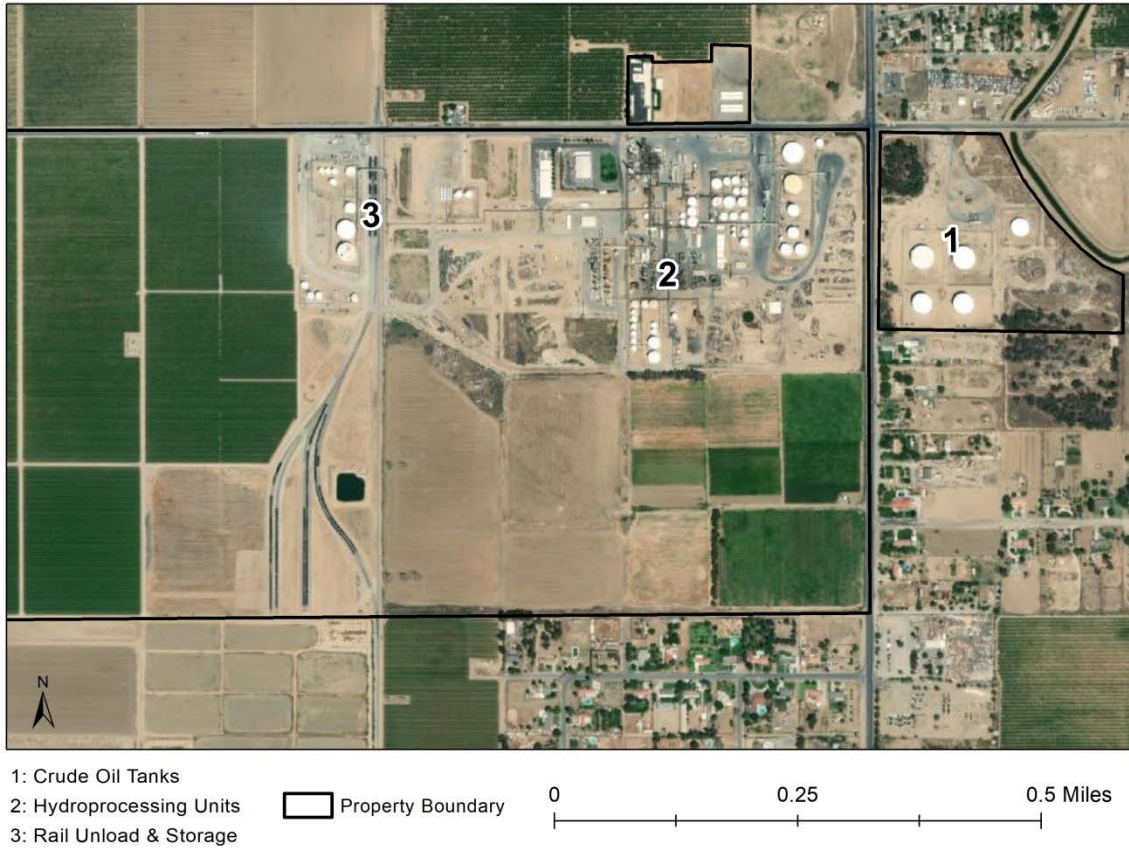


Figure 2. Map of the Kern facility showing the general layout. Neighboring residences are also visible to the northeast, east, and south.

Table 1. A summary of reported emissions that contain Rule 4460 compounds.

Compound	2019 Emissions (Tons/year)
VOC	46.3
SO _x	3.04

1.2 Summary of Monitoring Plan for Kern Oil Refinery

Kern’s monitoring and data reporting system will meet Rule 4460 requirements. Key elements include the following:

- Kern will measure all required species including BTEX, SO₂, and H₂S.

- Instruments that will be used to measure these species will include open-path UV-DOAS for BTEX and SO₂, and UV Fluorescence point analyzers for H₂S. The instruments will be capable of measuring these pollutants in real time. Meteorological parameters and visibility will also be measured.
- Kern will monitor concentrations across three open paths and two point locations. These paths and point locations are shown in [Figure 3](#). The monitoring will cover fence-line locations along the northeast, east, and south sides of the facility. Kern selected these locations after analyzing wind patterns, sources of potential air emissions on the refinery property, nearby local receptors, and logistical feasibility. These locations will provide coverage for nearby downwind communities under typical and atypical wind patterns.
- Data will be collected every 5 minutes.
- The data will be subjected to real-time automatic data quality control, and these preliminary data will be delivered to the public via a website within 10 minutes of collection. The data will also be used for any public notifications via an opt-in email notification system.
- Kern will perform more detailed quality control on a quarterly basis to produce final datasets and will make these data available within 30 days after the end of each calendar quarter.
- Kern will provide the District with quarterly data reports that will include a summary of periods when the instruments were inoperative, a list of routine maintenance periods, the nature of any repairs and adjustments, a summary of the data and health thresholds, data completeness, and any special quality control efforts beyond those described in the QAPP. Hard copies of the report will be made available to the public at the refinery on an appointment basis.
- Kern's public website will provide real-time data, historic data for the most recent annual quarter, frequently asked questions (FAQs), links to additional resources, and a feedback mechanism for the public.
- Notifications will be issued when thresholds are exceeded, when major activities affect the monitoring or reporting system, and when reports are available.
- Kern will operate and maintain equipment in accordance with a District-approved QAPP and associated standard operating procedures (SOPs).
- Kern will provide annual independent audits of the instruments to validate instrument performance. Internal audits and system checks will occur as part of regular operations and maintenance.
- Kern will provide temporary monitoring only during extended equipment downtimes (>96 hours) using 24-hr volatile organic compound (VOC) canister sampling. Note, extended downtimes are not anticipated.
- Kern will maintain all data records and chain-of-custody information for 5 years, consistent with other data record-keeping requirements.

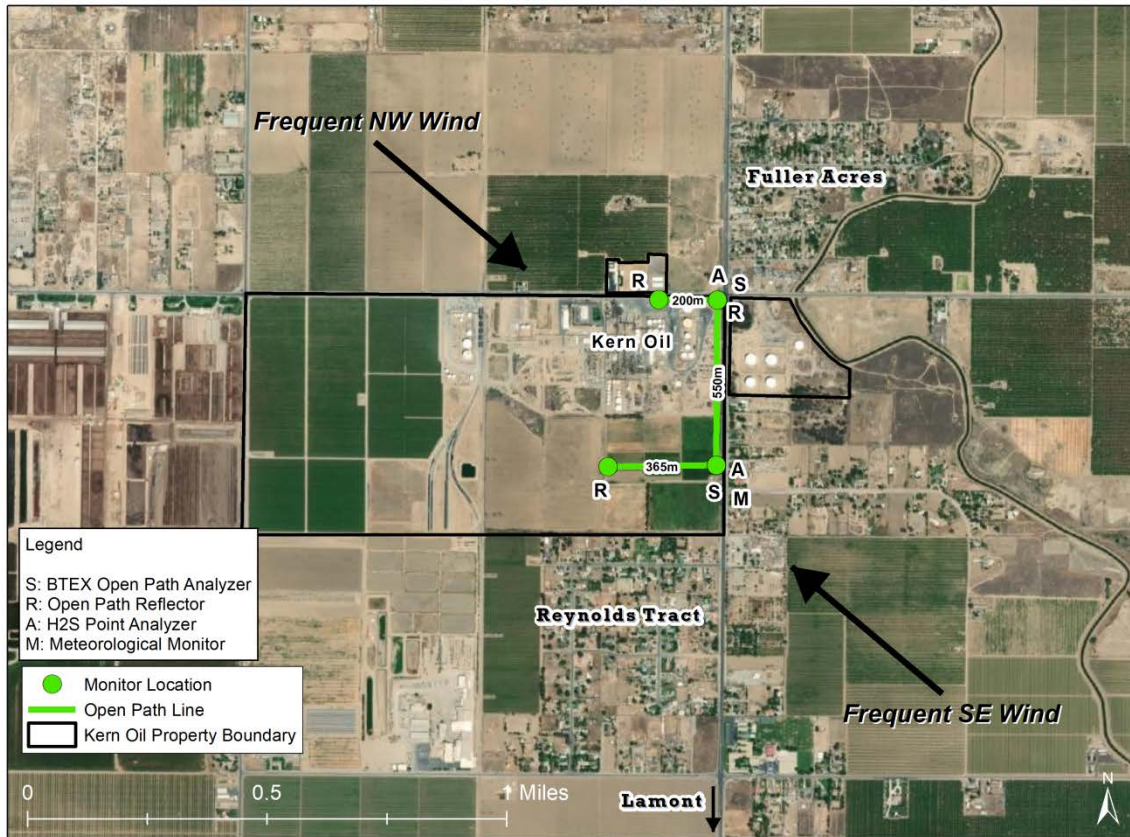


Figure 3. Monitoring paths for the Kern refinery in relation to the refinery equipment and property boundary. Note, instrument locations are approximate.

2. Summary of the Monitoring Network and Reporting System

This section describes the sampling locations, paths, and monitor types selected for the fenceline monitoring, as well as the specifications and maintenance requirements for each monitor. The compounds that will be monitored along each path/location are also provided. Point measurements are only for H₂S. Open-path technology for H₂S has not been proven to have a minimum detection limit (MDL) at or below the California Office of Environmental Health Hazard Assessment's (OEHHA) acute exposure threshold of 30 ppb; therefore, this technology will not be used.

Kern will monitor concentrations across three open paths and two point locations (shown in [Figure 4](#)). The Figure 4 legend indicates the type of monitor that will be placed at each location. The paths are described in [Table 2](#), and specific monitor locations are listed in [Table 3](#). A meteorological station will be installed and will include a visibility sensor in addition to sensors for measuring wind speed and direction, temperature, and relative humidity.



Figure 4. Locations of monitors covering the important fencelines around Kern.

Table 2. General monitoring locations including path lengths. All instruments and reflectors will be located between 2 m and 15 m above ground level depending on site logistics.

Path #	Monitor Location Description	Approximate Path Length (m)
1 (North-side)	East-West along N boundary, Point in NE corner	200
2 (East-side)	North-South along E boundary, Point and meteorological station in SE corner	550
3 (South-side)	East-West along S boundary	365

Table 3. Specific monitor locations.

Position	Monitor	Lat	Long
Southeast Location	<ul style="list-style-type: none"> • UV-DOAS open-path analyzer with panning head to point west and north • UV Fluorescence point analyzer • Meteorological monitor 	35.2909736	-118.9146596
Southwest Location	Open-path reflector	35.2909009	-118.9186648
Northeast Location	<ul style="list-style-type: none"> • UV-DOAS open-path analyzer to point west • UV Fluorescence point analyzer • Open-path reflector 	35.2959690	-118.9146818
Northwest Location	Open-path reflector	35.2959670	-118.9168370

Fenceline monitoring paths were chosen for the northeast, east, and south edges of the refinery property after considering dominant wind patterns (most frequently from the northwest and from the southeast), sources of potential air emissions on the refinery property, and nearby local receptors. Transmitter-detectors/analyzers will be located at sites labeled "S" (identified in Figures 3 and 4), and retroreflectors (mirrors) will be placed at the sites labeled "R". Point analyzer locations are denoted with an "A." The exact paths may need to be adjusted based on final site logistics and exact instrument capabilities, particularly in regard to the maximum path lengths for which the instruments can reliably measure the compounds of interest. Analyzers and reflectors will be mounted from about 2 m to 15 m above ground level depending on logistical constraints. Note that the height of the measurement along the light beam path will vary depending on refinery equipment or trees that could potentially interfere with the signal.

The following is Kern’s rationale for selecting the monitoring locations identified in Figures 3 and 4.

- Overall, the measurement locations cover the areas where nearby downwind receptors are located. This was based on the analysis presented in Section 3.
- Paths along the northeast, east, and south sides of refinery cover all near-downwind communities, which include Fuller Acres to the northeast, low-density rural housing to the east, and Lamont to the south. There are no nearby residences or sensitive receptors to the west.
- The north fenceline path is adjacent to the Crude and Cogen units and the Gasoline and Diesel tank farms, and also covers the main entrance into the refinery for truck and vehicle traffic. This path will include measurements of BTEX and SO₂ using an open-path analyzer and H₂S measurements in the northeast corner using a point analyzer.
- The east fenceline path sits on the eastern side of Weedpatch Highway near the diesel tank farm, and crude oil tanks. This path provides coverage of nearby low-density housing located just to the southeast of Kern under the dominant northwesterly flow and Fuller Acres under infrequent southwesterly flow. Measurements will include BTEX and SO₂ from open-path analyzers and H₂S from the point analyzer in the northeast corner. Note also, given the very near proximity of these monitoring systems to the crude tank farm located immediately east of Weedpatch Highway and because there are no downwind nearby receptors from the crude tanks under the common flow patterns (Northwest and Southeast), no additional monitoring is needed. Furthermore, Kern is implementing a robust emissions reduction project in this crude tank farm to equip the tanks with a new vapor recovery system designed to capture and control 99% of tank emissions.
- The south fenceline path provides coverage for the residential area at the southern edge of the refinery property as well as the community of Lamont. Measurements will include BTEX and SO₂ from open-path analyzers, and a point analyzer for H₂S measurements near the southeast corner of the refinery property boundary.
- A meteorological station will also be positioned at the southeast corner for wind flow that is unobstructed by trees or structures. Visibility measurements will be included here to identify instances of low-level Tule fog that will limit the ability of the open-path analyzers to detect transmitted light.
- No monitors are needed on the western property boundary because the wind rarely blows in this direction and there are no downwind nearby sensitive receptors in this area.

3. Local Topography, Meteorology, Local Communities and Sensitive Receptors

To provide a fence-line monitoring network that best serves the community, the following factors were considered: (1) the characteristics of the refinery location, including topography and meteorology, (2) emissions types and source areas, (3) locations of nearby communities and sensitive receptors, and (4) the spatial coverage of the monitors. Based on these considerations, monitoring along the eastern part of the northern fence-line of the main facility, the eastern fence-line of the main facility, and the southern boundary of the main facility provides the necessary measurements to capture potential impacts of facility emissions on nearby residences.

3.1 Topography and Meteorology

Kern is located in a rural area just outside of Bakersfield at the southern end of the San Joaquin Valley. The San Joaquin Valley extends northwest several hundred miles to the Sacramento River Delta. To the west about 30 miles lies the Coast Range that divides the Central Valley and the Pacific Ocean. Several mountain passes exist through the Coast Range throughout the San Joaquin Valley. To the northeast and east is the Sierra Nevada mountain range that abruptly rises to several thousand feet, with peaks above 10,000 feet. To the south roughly 10 miles, the Tehachapi Mountain range bounds the southern end of the San Joaquin Valley. These strong geographic features greatly influence the local weather patterns.

Two dominant wind flow patterns influence the transport of any facility emissions, with some seasonal variations. In the spring, summer, and early fall, winds most often blow from the northwest toward the southeast. These winds are driven by large-scale weather patterns, the channeling of flow by the regional topography, and strong temperature gradients between the coastal areas of California and the Central Valley. The winds blowing from the northwest are often strongest in the afternoon and evening and lighter overnight and in the morning hours. Some of the time, especially overnight and during morning hours, the winds reverse direction and come from the southeast. The reverse winds are typically driven by or reinforced by drainage flow from the Sierra Nevada. Occasionally in the winter, the southeast winds can be driven by winter storm systems. Calm or light and variable winds also occur and are most frequent in the overnight and morning hours and more often occur in the winter.

Radial histograms (wind roses) were prepared to provide the frequencies of wind speeds and directions (i.e., annual mean wind direction distributed by 30-degree arcs) by season using data from

December 2016 through November 2019. **Figures 5 through 9** show the 3-year average annual wind rose and seasonal wind roses using wind data recorded at the Bakersfield Municipal Airport, which is located about 10 miles northwest of the refinery. Key findings are summarized as follows:

- **Northwest winds (winds blowing from the northwest to the southeast).** Northwest winds occur about 40% of the time on an annual basis. Winds from these directions are most common in spring, summer, and early fall. The downwind receptors under these conditions include the eastern side of Lamont and scattered residences southeast of the facility.
- **Southeast winds (winds blowing from southeast to the northwest).** Southeast winds occur about 15% of the time on an annual basis. There are no nearby receptors downwind of the facility during southeasterly wind flow.
- **Calm or light winds (0 to 1 mph speed).** These conditions occur about 20% of the time. Under these conditions, it is possible that air could flow through the northeast corner of the facility toward Fuller Acres, given the community's proximity to the facility.
- **All other wind directions.** Winds from other directions occur with lesser frequencies and account for the remaining 25% of the flow directions. Under northerly wind conditions, scattered residences just to the south of the facility are downwind. There are no other nearby receptors for other wind directions.

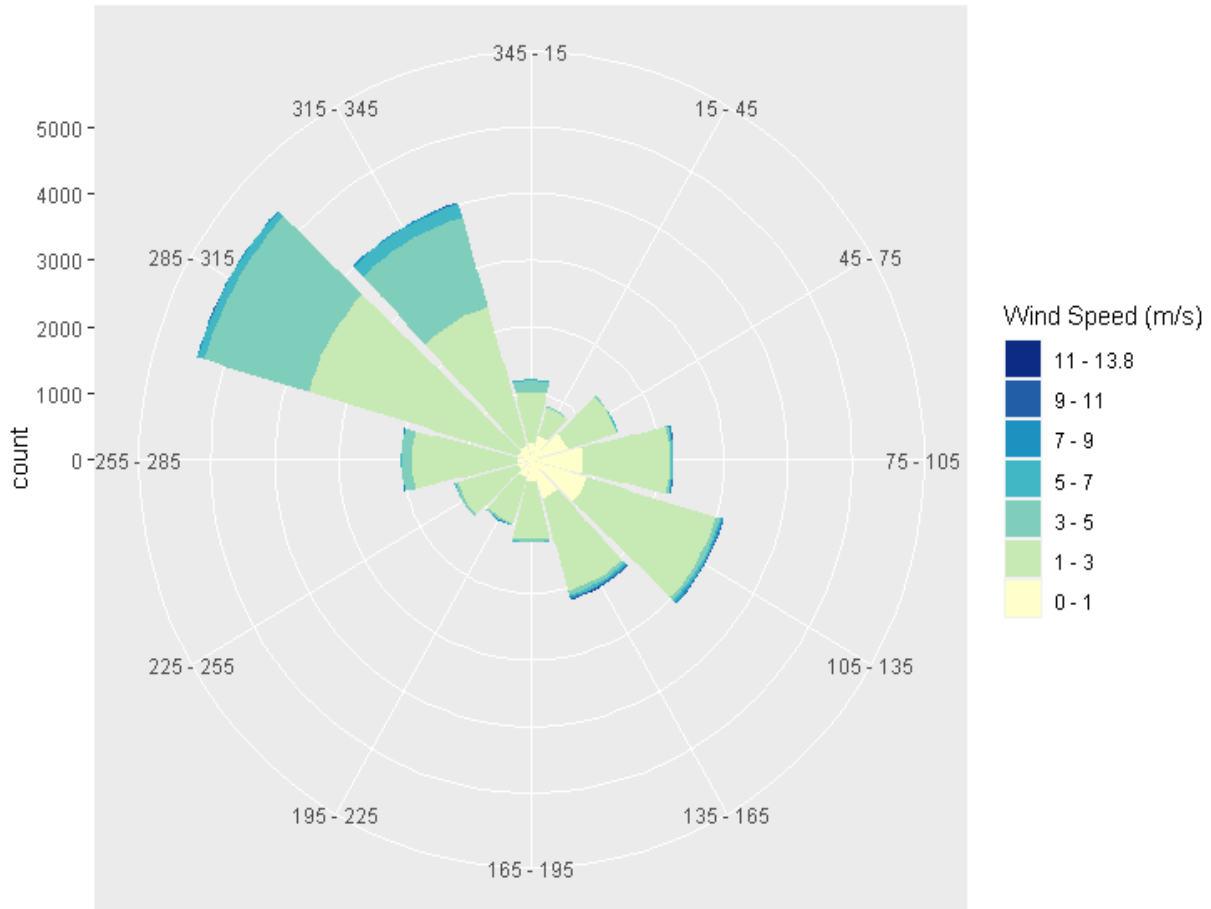


Figure 5. Annual (December 2016 through November 2019) wind rose for Bakersfield Municipal Airport. Source: U.S. Environmental Protection Agency's (EPA) AirNow-Tech.

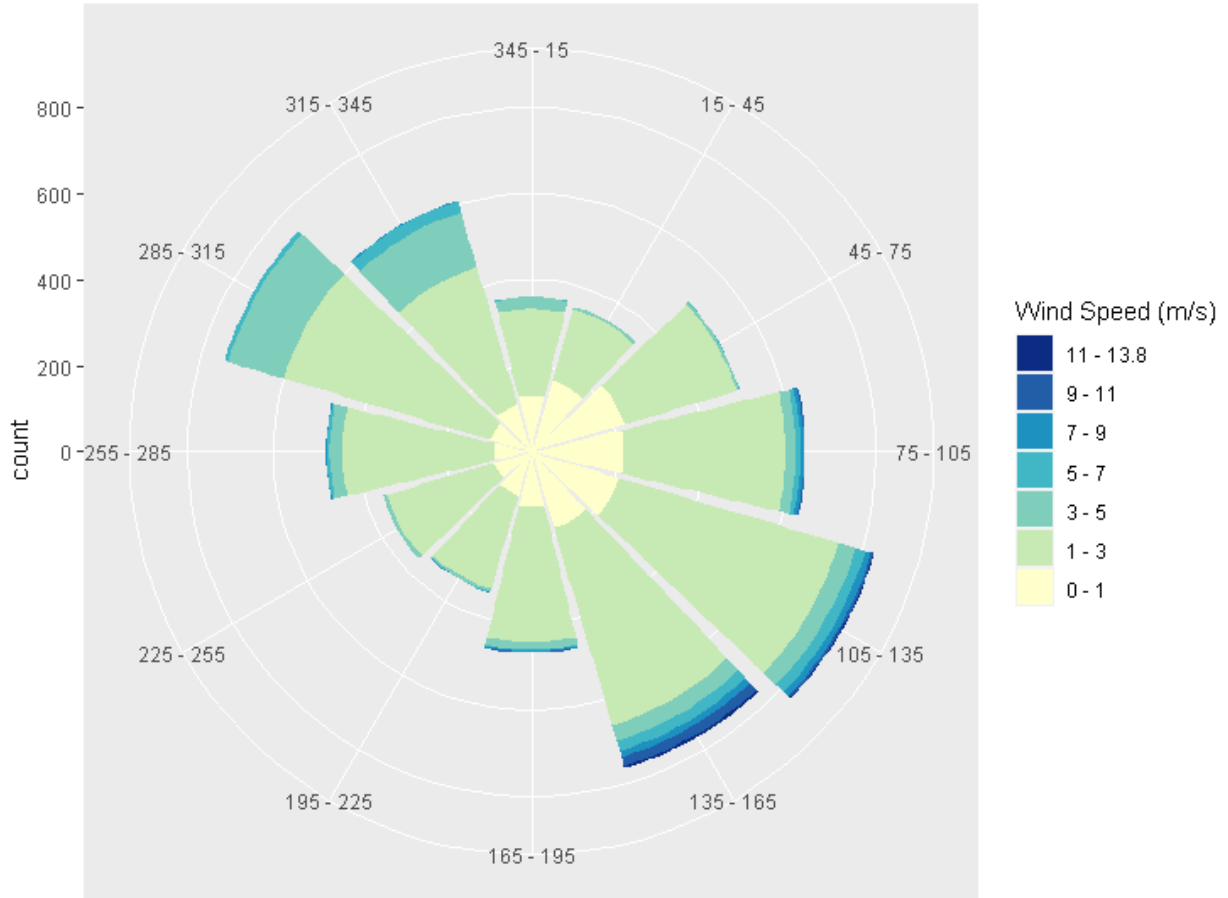


Figure 6. Winter (December through February) 2017-2019 wind rose for Bakersfield Municipal Airport. Source: EPA's AirNow-Tech.

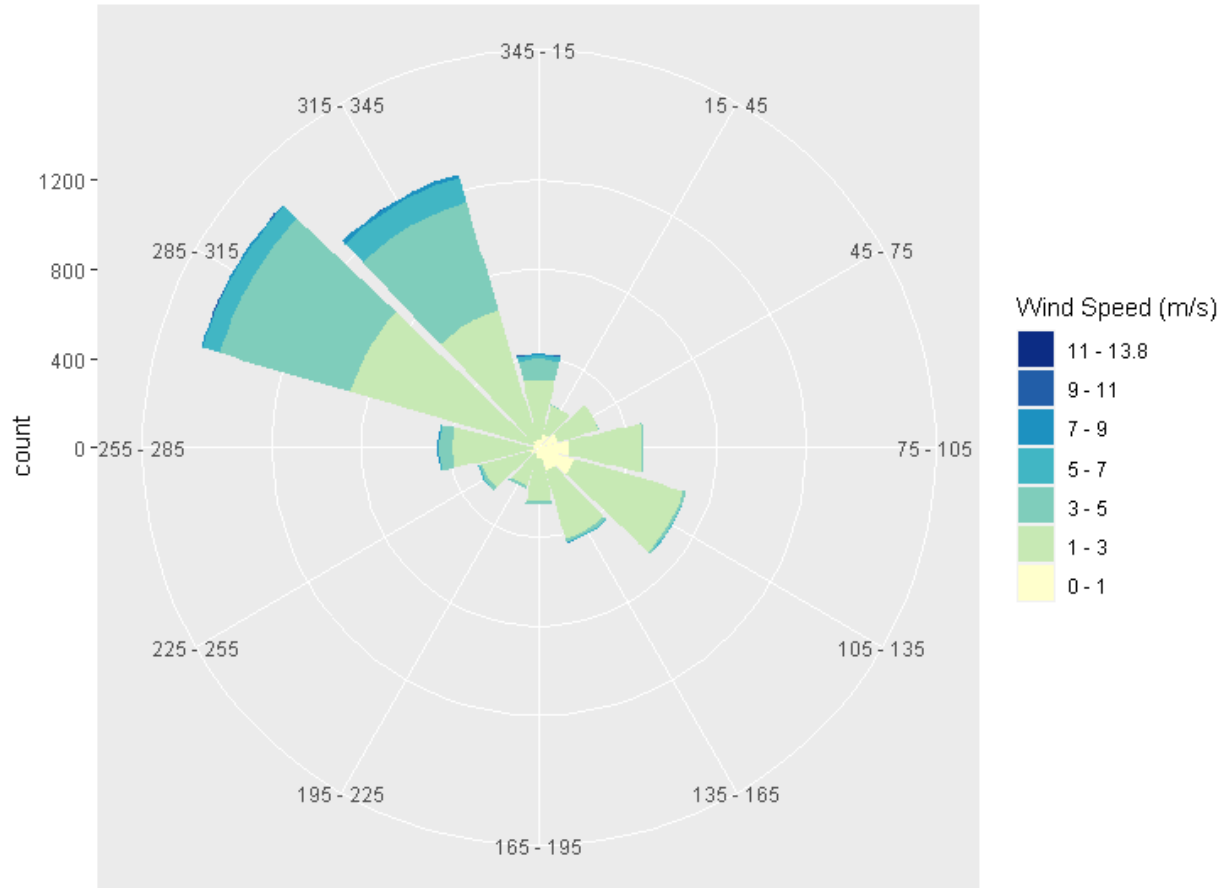


Figure 7. Spring (March through May) 2017-2019 wind rose for Bakersfield Municipal Airport. Source: EPA's AirNow-Tech.

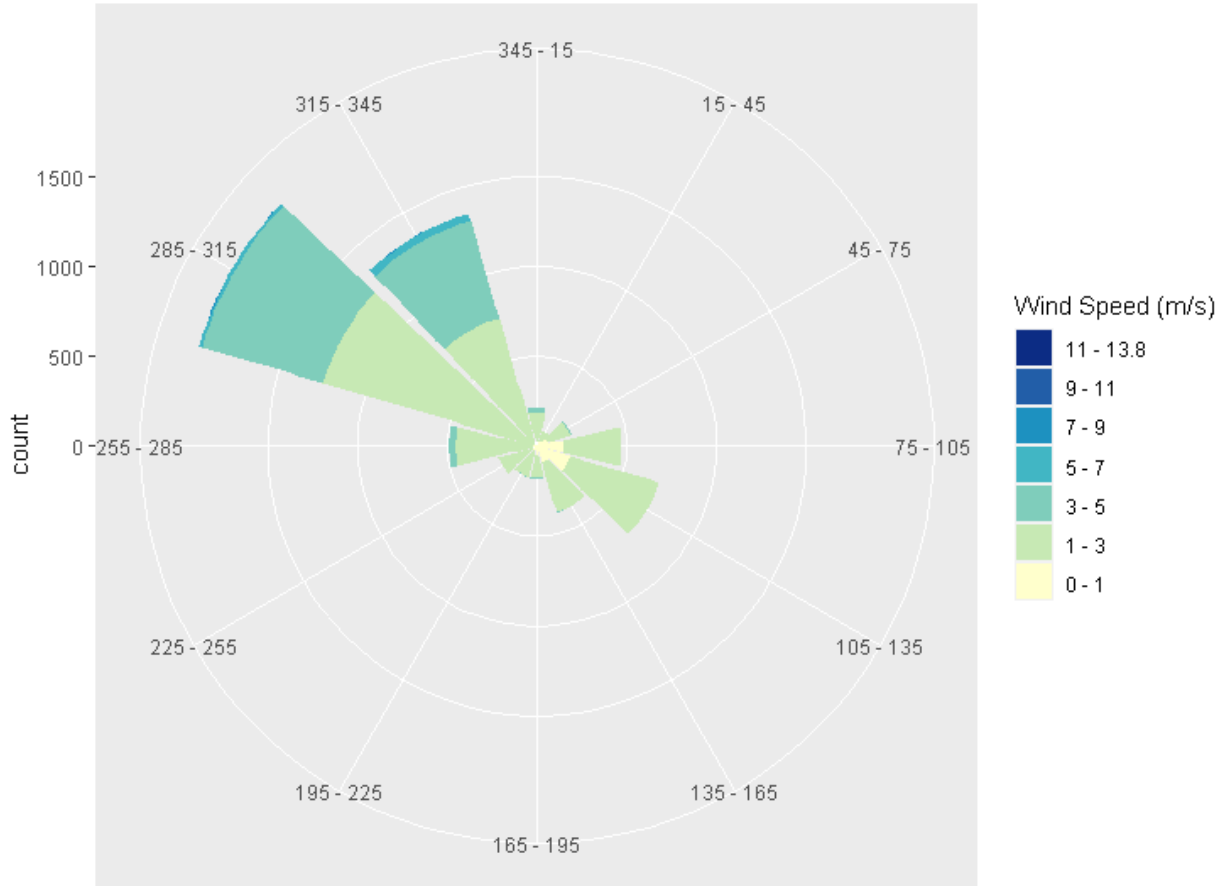


Figure 8. Summer (June through August) 2017-2019 wind rose for Bakersfield Municipal Airport. Source: EPA's AirNow-Tech.

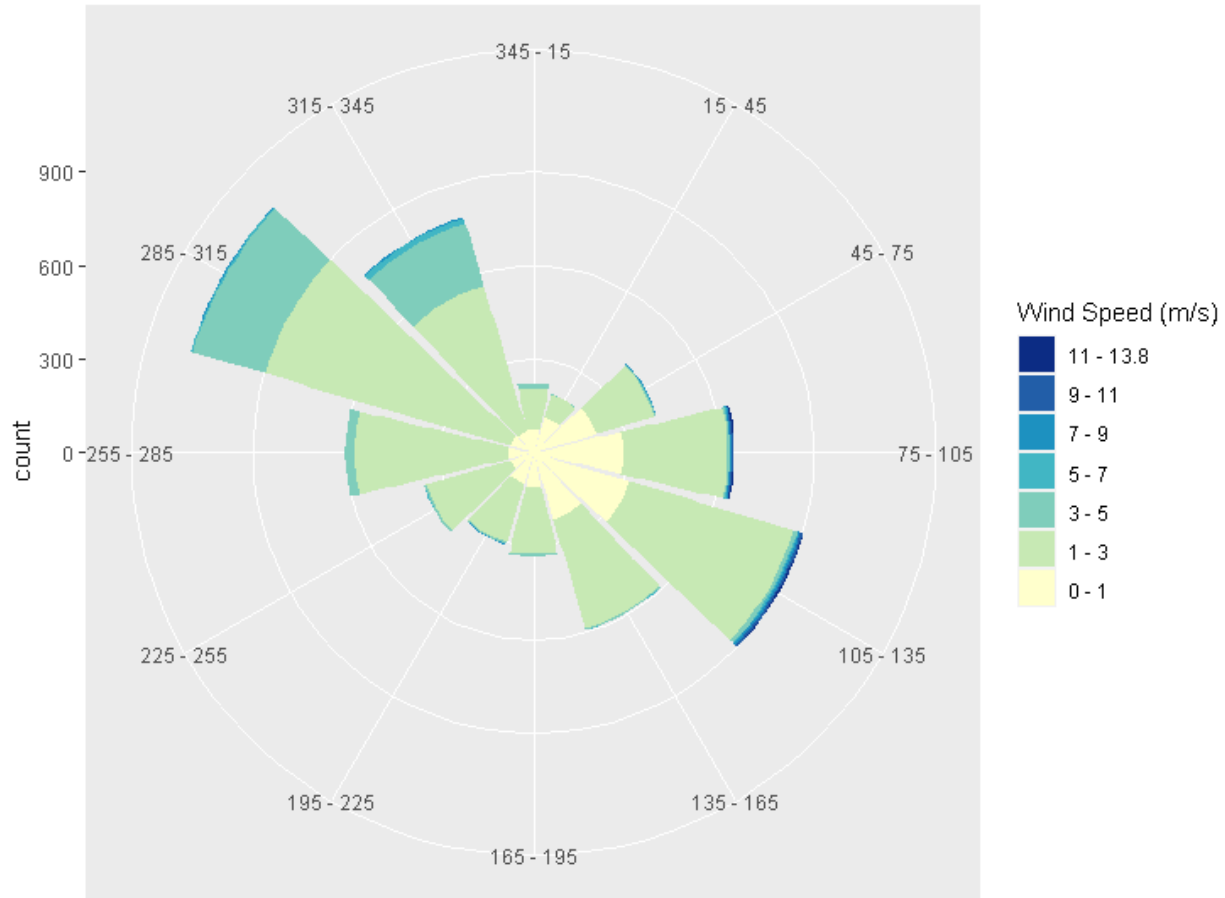


Figure 9. Fall (September through November) 2017-2019 wind rose for Bakersfield Municipal Airport. Source: EPA’s AirNow-Tech.

3.2 Community and Sensitive Receptors

The nearby-populated public areas of Fuller Acres and Lamont represent air quality “receptor” communities that may at times be downwind from Kern. In addition to these areas, sensitive receptors were evaluated for all surrounding areas within about four miles of the facility. In particular, sensitive receptors, such as schools, daycare centers, youth centers, adult care facilities, hospitals, clinics, nursing homes, recreation areas, libraries, museums, and churches in the area were identified. Sensitive receptor data was collected from two main sources: <https://www.infousa.com/> and the U.S. Geographic Names Information System (GNIS) via Esri Data and Maps for ArcGIS, 2018. **Figure 10** shows the location of the nearby sensitive receptors with respect to the refinery. As noted in Figure 10, there are only a few sensitive receptors within a mile of the facility. Almost all receptors are located in Fuller Acres or Lamont. There are no nearby sensitive receptors located to the west of the facility within about 4 miles.

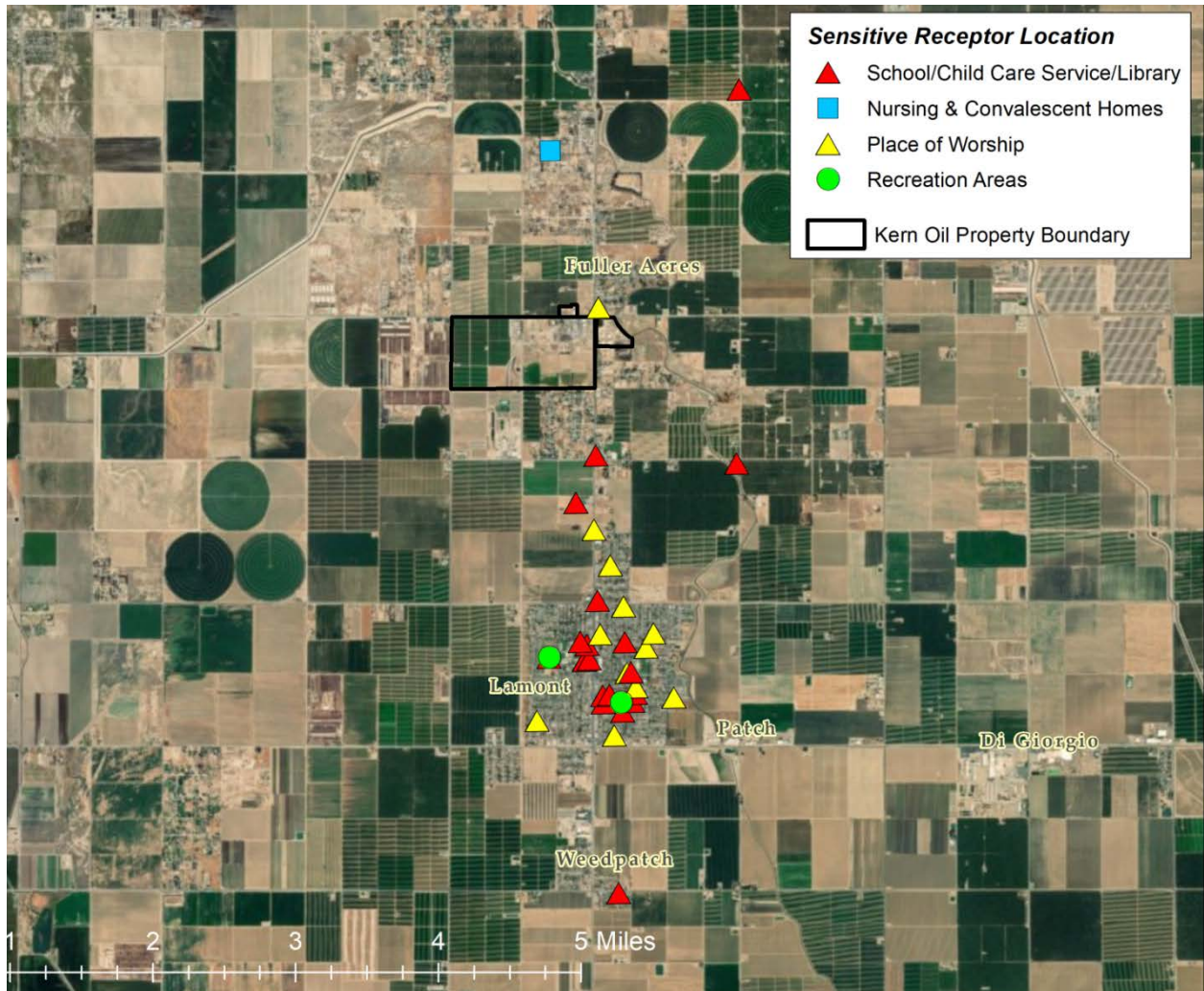


Figure 10. Locations of sensitive receptors near the Kern Refinery.

4. Details of Proposed Instruments

Kern's crude oil refining capacity is approximately 26,000 bpd, which according to Rule 4460, requires benzene, toluene, ethylbenzene, and xylenes (BTEX), SO₂, and H₂S to be monitored. Literature reviews, site surveys, and interviews with instrument manufacturers were performed to determine the instruments needed to meet Rule 4460 requirements. Both fixed-site and open-path instruments were investigated.

In light of the current state of measurement technology, open-path instruments (UV-DOAS) were selected for measuring BTEX and SO₂ and UV fluorescence point monitors were selected for measuring H₂S.

4.1 Instrument Specifications

Along the measurement paths (see Section 1.2), SO₂ and BTEX will be measured by monostatic Ultra Violet-Differential Optical Absorption Spectroscopy (UV-DOAS) with a xenon light source. The xenon light is required to achieve measurements over paths that are about 300 to 600 meters long and to achieve adequate minimum detection limits (MDL). The analyzer records the intensity of light reflected back from a retroreflector array at discrete wavelengths. Any UV-absorbing gas that is present in the light beam absorbs at a specific wavelength of light. Each gas has a unique absorbance fingerprint (i.e., the ratios between the absorbance at several different wavelengths are unique to that gas). The analyzer compares regions within the sample absorbance spectra to the same regions within the reference absorbance spectra and uses a classical least squares regression analysis to compare the measured and calibrated reference spectra. Beer's Law is used to report accurate gas concentrations. Although the approach specified in the U.S. Environmental Protection Agency's (EPA) TO-16 Methodology² was not written specifically for UV-DOAS, the approach is the same.

A schematic showing the light source/analyzer and the retroreflector array is shown in [Figure 11](#). The figure also illustrates that the analyzers provide a concentration across the entire path length. Monostatic (as opposed to bistatic) open-path instruments have been selected to reduce the need for substantial power at the retroreflector sites and improve minimum detection limits by increasing effective path lengths. Thus, only the light-source/detector end of the monitoring path requires substantial power, communications, and shelter. Limited power is needed for heaters at the retroreflectors. The retroreflector needs to be aligned at the other end of the path for maximum performance and will be cleaned regularly.

² Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air. Compendium Method TO-16. Long-Path Open-Path Fourier Transform Infrared Monitoring Of Atmospheric Gases (1999) EPA/625/R-96/010b.

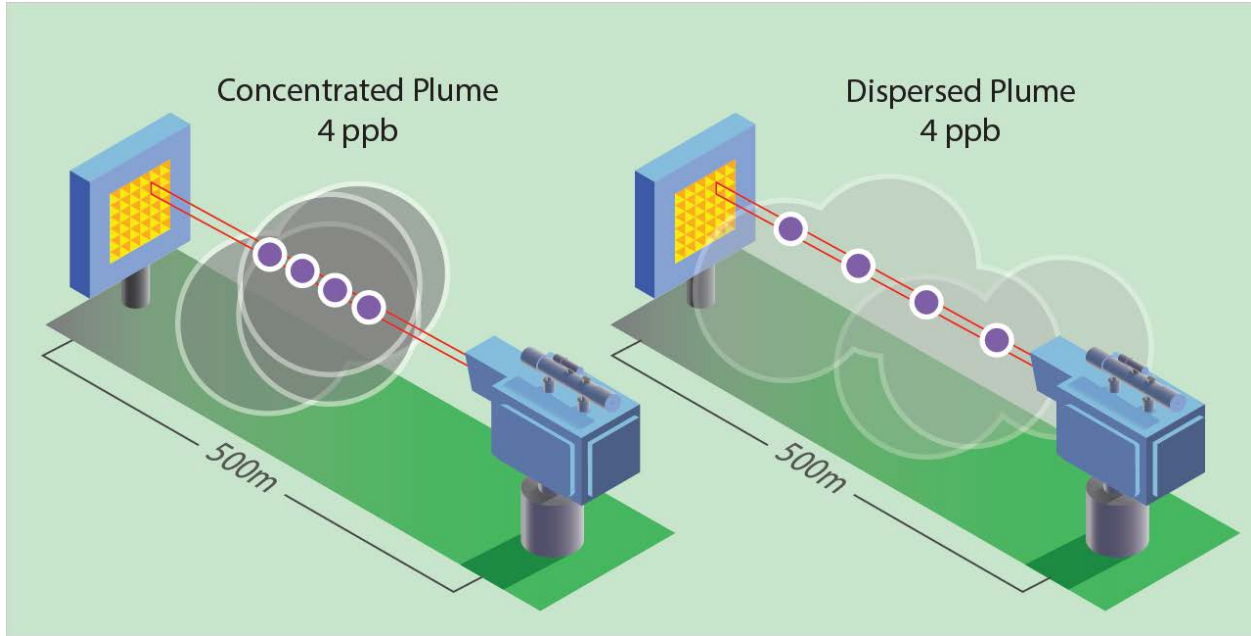


Figure 11. Schematic of an open-path monitoring system, depicting two types of path-integrated plumes measuring the gas concentration.

For H₂S concentrations, a point analyzer will be used, providing concentration information at the instrument location. The analyzer is based on UV fluorescence principles to detect H₂S at levels typical of ambient air monitoring. In this method, UV radiation excites chemicals in an object and causes them to release visible light, which can then be detected.

4.2 Pollutant Detection Limits

Table 4 summarizes the instrument specifications, including detection limits. The detection limits listed are approximate and are based on the theoretical capabilities of the instruments; however, they are supported by manufacturers' lab tests and real-world applications.

Actual detection limits will depend on atmospheric conditions and on the specific instrument brand used. Periods of poor visibility due to weather-related conditions (e.g., fog) are known to interfere with open-path measurements. Rule 4460 anticipates some data loss due to poor visibility and allows for such data loss if supported by visibility measurements. The Refinery will monitor visibility using a standard extinction measurement to identify periods of poor visibility that may cause data loss. For each of the meteorological sensors, operating ranges are provided. To provide context in relation to health benchmarks, the OEHHA chronic and acute Reference Exposure Levels (RELs) are also provided in Table 4. The analyzer detection limits are adequate for each of the gas species to be monitored as part of Rule 4460.

Table 4. Instrument specifications and the detection limit for each of the analyzer’s detection methods compared to OEHHA health benchmarks.

Analyzer Detection Method	Compounds Measured	Instrument Detection Limit*	OEHHA Chronic REL (ppb)	OEHHA Acute 1-hr REL (ppb)
UV Fluorescence	H ₂ S	<0.5 ppb	7.2	30.1
UV Differential Optical Absorption Spectroscopy (UV-DOAS)	Benzene	<0.5 ppb	0.9	8.5
	Toluene	<1.0 ppb	79.6	9812
	Ethylbenzene	<0.5 ppb	460.6	-
	Xylenes	<0.5 ppb (m/p); <4.0 ppb (o)	161.2	5067
	SO ₂	<1.0 ppb	-	251.9
Infrared forward-scattering	Visibility	Range = <20 ft to 46 miles	-	-
Resistance thermometer capacitive polymer	Temperature Relative humidity	Temp range = -39.2 to 60°C RH range = 0.8% to 100%	-	-
Wind vane	Wind speed Wind direction	Wind speed: 0-50 m/s Azimuth: 0-360 degrees	-	-

*Open-path detection limits are based on typical path length of 500 m.

5. Operations and Maintenance

Instrument operations, maintenance, and bump tests include daily checks to ensure that data are flowing consistently, as well as monthly, quarterly, and annual maintenance activities. Further details are provided in the following sections, which describe routine instrument and data management operations. Additional details and documentation, including standard operating procedures (SOPs), for example, will be included in the finalized Quality Assurance Project Plan (QAPP, [Appendix A](#)). Modest adjustments to the operating plans may be needed, depending on the brand of instruments that are ultimately selected.

5.1 UV-DOAS

The UV-DOAS system is designed to require only modest service and maintenance. [Table 5](#) summarizes typical UV-DOAS maintenance activities as recommended by a manufacturer. Preventive maintenance frequency depends on the operating environment and may need to be adjusted beyond manufacturers' recommendations once the instruments are deployed in the field. On an as-needed basis, system status alarms will alert operators to specific issues needing to be addressed.

Table 5. Schedule of maintenance activities for the UV-DOAS.

Activity	Monthly	Quarterly	Annually
Visually inspect the system.	✓		
Inspect optics on detector and retroreflector; clean if necessary. Ensure there are no obstructions between the detector and the retroreflector (such as equipment, vegetation, vehicles).	✓		
Inspect system filters.	✓		
Confirm the alignment to verify there has not been significant physical movement.	✓		
Download data from detector hard drive and delete old files to free space, if needed.	✓		
Change out the UV source.		✓	
Replace ventilation exit and intake filters.		✓	
Clean optics on detector and retroreflector.		✓	
Realign system after service.		✓	
Check system performance indicators.		✓	
Perform bump test (simulates system-observed gas content at the required path average concentration) to verify the system can detect at or below a lower alarm limit.		✓	
Review and test light and signal levels. Check average light intensity to establish baseline for bulb change frequency.		✓	
Verify system settings.			✓

5.2 UV Fluorescence Analyzer

Table 6 describes typical maintenance actions for an H₂S point analyzer, such as cleaning and inspections, as well as their required frequencies for routine system management. Preventive maintenance ensures operational integrity and is strongly urged by the manufacturer. Frequency of maintenance checks may need to be adjusted beyond manufacturers’ recommendations once operations begin.

Table 6. Schedule of maintenance activities for an H₂S UV Fluorescence Analyzer.

Activity	Monthly	Quarterly	Annually
Inspect sample line tubing.	✓		
Inspect particle filter at inlet and replace as necessary.	✓		
Perform zero/span check.	✓		
Inspect particle filter inside analyzer and replace as necessary.		✓	
Perform flow check.		✓	
Perform gas test for analyzer response.		✓	
Replace pump diaphragm.			✓

5.3 Meteorological and Visibility Sensors

Meteorological sensors provide information about wind direction and speed to help determine sources of any air contaminants. The meteorological sensors will be maintained on a monthly and biannual basis. **Table 7** lists the maintenance activities that will be performed.

Table 7. Schedule of maintenance activities for the meteorological tower.

Item	Activity	Monthly	Biannually
Tower	Check that the tower is securely anchored to the shelter.	✓	
	Check the tower for signs of damage or excessive wear.	✓	
	Inspect all bolts at the tower base for any signs of corrosion (rust).	✓	
	Check the tower’s vertical alignment.	✓	
Anemometer	Note whether any component (tail, propeller) is missing or has suffered obvious damage.	✓	
	Check that the whole sensor moves freely with a changing wind direction and the propeller rotates freely when windy.	✓	
Temperature/ RH Sensor and Shield	Inspect the hardware holding the temperature/RH sensor shield assembly to the tower and tighten the bolts if necessary.	✓	
	Check that the cable connections are secure.	✓	
All sensors	Calibration		✓

Fog events may impact open-path measurements at times, especially during the nighttime and early morning hours. Visibility measurements will be made to provide operational verification of fog events. Maintenance activities for the visibility sensor are included in Table 8. Monthly maintenance includes inspecting the sensor for dirt, spiderwebs, birds’ nests, or other obstructions and cleaning if necessary. There are no major serviceable components in the sensor. The sensors are calibrated annually in the field using a manufacturer-specific calibration kit.

Table 8. Typical schedule of maintenance activities for the visibility sensor.

Activity	Monthly	Annually
Visually inspect the system, including all cables. Clear out any obstructions and clean the glass windows.	✓	
Check that the cable connections are secure.	✓	
Perform the zero and light-level calibration.		✓

5.4 Additional Maintenance and Failure Activities

Normal routine scheduled maintenance for open-path instruments occurs once per month (at least). Instrument downtime for routine maintenance is expected to be less than four hours per month. During those maintenance visits, the operator will carry normal repair parts to the site.

If, between routine visits, monitors fail to report data or appear to be reporting erroneous data, both remote diagnosis and, if necessary, a site visit will be conducted. If the problem cannot be resolved with the equipment or parts on hand, then Kern will obtain replacement parts from the vendor. Kern will keep some spare parts available for emergency repairs. It is expected that with these measures, the problem can be resolved by the next business day. If downtime exceeds more than 96 hours, integrated 24-hr canister samples of VOCs will be taken once per day on the predominant upwind/downwind directions. VOC data will be reported to the District within 30 days after collection.

6. Data Quality

All data values that are not associated with bump tests or other instrument maintenance will be displayed to the public in near-real time (i.e., in about 10 minutes or less). If data are subsequently proven to be invalid, they will be removed from the public display, and the rationale for data removal will be provided. Common reasons for invalidation include instrument malfunction, power failure, and bump test data that were not identified as such.

6.1 Data Quality Objectives and Criteria

To ensure quantitative accuracy of field measurements, measurement performance criteria are established as part of the monitoring design. These criteria specify the data quality needed to minimize decision errors based on the data. The quantitative performance criteria for the data collected by the fenceline measurement systems are provided in this section. The principal quantitative indicators of data quality for this study are data completeness, precision, and accuracy. The objective of these measurements is to achieve 75% data completeness for all measurements at 1-hour and 24-hour intervals and 90% completeness of daily values for each annual quarter, excluding instrument downtime due to weather conditions.

In the field, a bump test simulates system-observed gas content at the required path average concentration and is used to verify that the system can detect concentrations at or below a set level of concern. Instrument bump tests (done quarterly) are used to evaluate performance with regards to precision and accuracy. These will be done in adherence to the approved QAPP. [Table 9](#) shows the performance criteria for the monitoring systems.

6.2 Data Quality Control Overview

In addition to the quarterly verification of instrument operations by conducting gas audits, more frequent review of the data will be conducted. The three levels of data quality control that will be performed are:

- QC1: Automated quality control of data
- QC2: Daily checks by analyst
- QC3: Quarterly review and reporting

Table 9. Performance criteria for the fenceline monitoring systems.

Sensor	Test	Acceptance Criteria for Precision and Accuracy
UV-DOAS	100 ppm p-Xylene; internal flow-through QA cell	±25%
H ₂ S Point Monitor	0, 250, 150, 50 ppb	±20%
Temperature	Two-point test	±0.5°C
Relative Humidity	Hygrometer	±7%
Wind Speed	Starting threshold test; transfer function test	±0.25 m/s below 5 m/s and ± 5% above 5 m/s
Wind Direction	Angle verification	±5 degrees
Visibility	Extinction	±10%

6.2.1 QC1 – Automated Quality Control

The first level of quality control checks are conducted automatically on the real-time data, using the data management system (DMS). The DMS can handle the large volumes of data that will be generated in this project. This allows data to be displayed within approximately 10 minutes of collection. Real-time data will be subjected to the following tests:

- **MDL.** Is current value below MDL?
- **Range.** Ensure the instrument is not reporting values outside of reasonable minimum and maximum concentrations.
- **Sticking.** If values are repeated for a number of sampling intervals, data will be reviewed for validity. Typically, four or more intervals of sticking values are a reasonable time span to indicate that investigation is needed. Sticking checks will not be applied to data below the instrument detection limit.
- **Rate of Change.** Values that change rapidly without reasonable cause will be flagged as suspect and reviewed.
- **Missing.** If data are missing, data collected during those time periods will be marked as missing.
- **Sensor OP Code.** If the instrument assigns operation (OP) codes to data automatically (e.g., for bump tests, internal flow rate checks, light extinction criteria, integration time criteria), the data will be reviewed, op codes confirmed, and data flags checked.
- **Visibility.** If visibility drops below threshold value, data will be marked as invalid.

Data that fail checks will be flagged in the DMS and brought to the attention of data reviewers. Data are invalidated only if a known reason can be found for the anomaly or automated screening check failure. If the data are anomalous or fail screening, but no reason can be found to invalidate the data, the data are flagged as suspect. Additional analysis may be needed to deem data valid or invalid. Screening checks are typically specific to the site, instrument, time of day, and season, and adjusted over time as more data are collected.

6.2.2 QC2 – Daily Checks by Analyst

A non-public field operations website will be used for daily graphical review of the data (an example is provided in [Figure 12](#)). Common data problems include flat signal/constant values, no signal/missing data, extremely noisy signal, rapid changes (spikes or dips), and negative concentrations. An initial review, typically of a three-to five-day running time-series plot of selected parameters for each instrument, allows the analyst to see common problems and verify instruments are operational.

Types of items checked based on results of initial review of concentration data include:

- Instrument alignment.
- Spectral data if several acquisitions of compounds of concern are above detection.
- Signal intensity and integration time.
- Meteorology measurements.

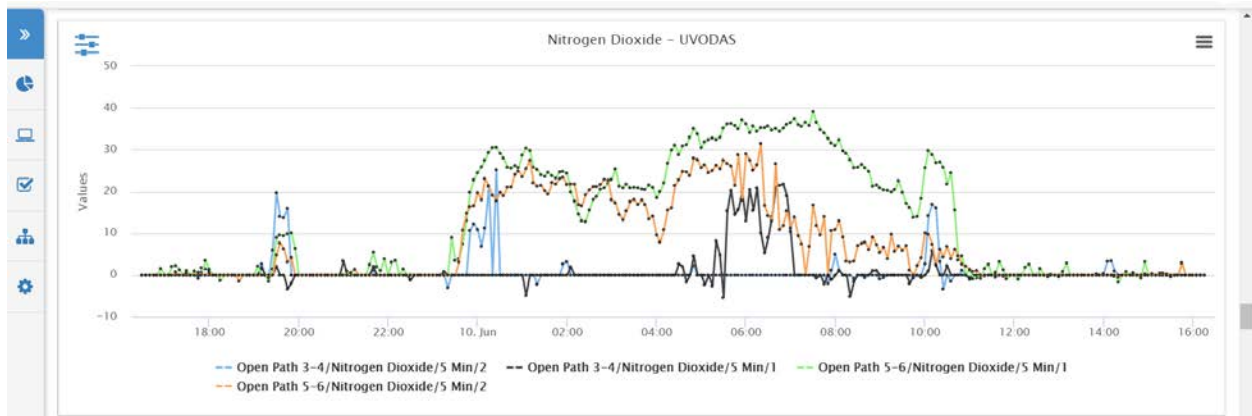


Figure 12. Example of a non-public field operations website used for daily review of open-path instrument operations.

The DMS will be used to automatically quality control data and detect outliers and problems, but will also be used to create alerts. The DMS will feed auto-screened data to the field operations website and notification system to inform project and facility staff. These non-public real-time auto-alerts to

the project team may be used to indicate any issues (e.g., missing data). If it appears that an instrument is not operating properly, or the data are missing, the field operator will be notified and further investigation and corrective action, if needed, will be taken. The DMS data will be backed up on a daily basis.

6.2.3 QC3 – Quarterly Review and Reporting

In addition to auto-screening and daily visual checks, data will be subjected to more in-depth review on a quarterly basis and when data fail screening. Final data sets will be compiled quarterly, 30 days after each quarter's end. Kern will maintain a data record for five years.

These in-depth analyses typically require data that are not available in real time and ensure that the data on the website are updated. Validation checks will include:

- Looking for statistical anomalies and outliers in the data.
- Inspecting several sampling intervals before and after data issues, bump tests, or repairs.
- Evaluating monthly summaries of minimum, maximum, and average values.
- Ensuring data reasonableness by comparing to remote background concentrations and average urban concentrations.
- Referring to site and operator logbooks to see whether some values may be unusual or questionable based on observations by site operator.
- Ensuring that data are realistically achievable, i.e., not outside the limits of what can be measured by the instrument.
- Confirming that bump tests were conducted and were within specifications.

On a quarterly basis, analysts will subject the data to final QC including:

- Verify that routine instrument checks were acceptable and that appropriate QC checks were applied.
- Review instrument bump test results for consistency.
- Fill in missing records with null values and add Null Codes.
- Inspect data consistency over three months.
- Review manual changes to operations/data and verify that changes were logged and flagged appropriately.
 - Review ranges of values for consistency—ranges should remain consistent over months of monitoring.
 - Review data completeness.

6.3 Independent Quality Oversight

Kern will work with independent staff to perform annual systems and performance audits that include the following elements:

- Review of the quality assurance procedures in the QAPP and SOPs.
- Observation of the routine instrument checks as performed by the normal field staff on each instrument type.
- Independent calibration checks or bump tests of instruments, following the criteria outlined in Section 6.1 and the QAPP (see Appendix A).
- Audit of data flow from the various instruments through the data logger and database system to the public website.
- Review of the data validation procedures used for the latest quarterly or annual report.

6.4 Quality Assurance Project Plan

The QAPP is provided in Appendix A and contains the following key elements:

1. Project background and management
2. Technical approach
3. A description of the analytical equipment
4. Data quality objectives
5. Quality control procedures
6. Data management (QC, verification, validation)
7. Documentation and records (QA/QC, training)
8. SOPs (these will be provided once Kern selects the instrument make and model).

The QAPP will be reviewed annually and updated as needed.

6.5 SOPs for Equipment

SOPs for the instruments will be included with the QAPP once final instrument determinations are made after plan approval. SOPs will be reviewed and updated as needed.

7. Public Data Display

A public website will be used to provide the data to the public, the District, and local response agencies in real time, in addition to other supporting information. **Figure 13** is an example of a public-facing website. The website provided by Kern for the public will have a similar look and feel. The exact web design will be finalized at a later date but will include these key features:

- A summary of the program goals on the home page.
- A visual display of data in near-real time. Historical data for the prior quarter will also be provided.
- Information for the public to better understand the concentrations displayed.
- A mechanism for public feedback on the website.
- A description of monitoring techniques.
- A description of monitored pollutants.
- A discussion of typical background levels of each pollutant to provide context.
- A description of QA/QC procedures.
- Documentation of QC flags (valid, invalid, suspect, missing) for each data point displayed.
- Hyperlinks to related information from publicly available websites.
- FAQs.

The preliminary quality-controlled data will be presented as time-series and spatial plots of species concentrations and wind speed and direction. Data will be provided as 5-minute averages and running hourly averages and will be available within 10 minutes after data collection. All real-time data will be preliminary until made final after quarterly data quality control is completed. Data will be color-coded to represent concentration levels and annotated for quality (valid, invalid, suspect, missing).

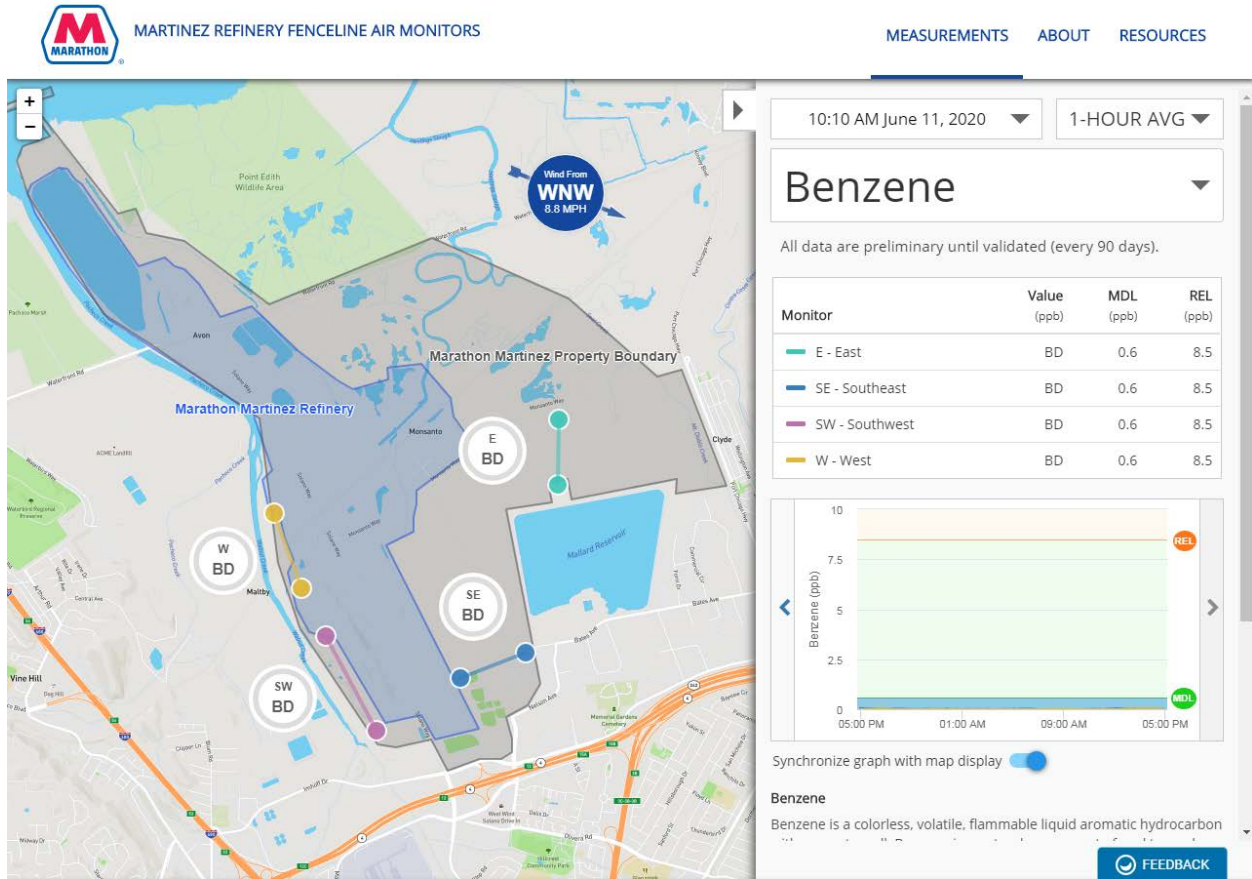


Figure 13. Example of a public data display of fenceline air monitoring data.

Information will be written at a public-friendly level with links to additional resources for members of the public who want to delve deeper into the science. Clarity and thoroughness will help to reduce the number of questions that arise.

The home page of the public-facing website will be dedicated to providing background on reasons the monitoring is taking place and the type of technology being used in the monitoring system. From the home page, a "Resources" page will be provided. The "Resources" page will include a frequently asked questions (FAQ) page, a definitions page, and other educational material.

To facilitate public feedback, a feedback button will be provided on the web page. When a user clicks on the button, an email form will pop up for the user to submit comments about the website. The email will be delivered to a Kern contact responsible for deciding how to respond to the public comments. The emails received through the website will be archived. Some of the comments may aid in the creation of additional FAQs.

8. Notification System

Kern will develop a notification system in accordance with Rule 4460 Guidelines. The website will provide an opt-in sign-up for the public and agencies to receive notifications. The public, the District, and local response agencies will be notified via email generated when values exceed thresholds, when activities may have a major effect on the monitoring system, if there is a false alarm, or when periodic reports are available.

Notifications will be triggered automatically when concentrations exceed threshold levels listed in **Table 10**. The concentrations will be calculated as 1-hour rolling averages that are updated every five minutes. These notifications will be accompanied by a message on the home page of the public website. Concentration thresholds correspond to the OEHHA acute relative exposure limits (RELs).³

Table 10. Thresholds for triggering automated notifications. Values for gaseous species in this table are acute 1-hour Reference Exposure Levels from OEHHA. Values in this table should be considered preliminary and may be refined either during the project implementation or after the instruments have been deployed.

Measurement	Threshold Level
Benzene	8.5 ppb
Ethylbenzene	460 ppb
Hydrogen Sulfide	30 ppb
Sulfur Dioxide	250 ppb
Toluene	9,800 ppb
Total Xylene	5067 ppb

³ California Office of Environmental Health Hazard Assessment (2017) Analysis of refinery chemical emissions and health effects. Draft report, September. Available at <https://oehha.ca.gov/media/downloads/faqs/refinerychemicalsreport092717.pdf>.

9. Implementation Elements and Schedule

Once this monitoring plan is approved, Kern will proceed with the implementation of the monitoring and reporting system following the plan. An implementation schedule detailing the key milestones for implementation of the monitoring system is shown in [Table 11](#). If there are significant delays in getting the plan approved, the schedule may change.

Table 11. Approximate implementation schedule for Kern Rule 4460 monitoring project.

Project Element	Completion Date
Determine exact final site locations	Within 2 weeks after plan approval
Develop specifications for infrastructure (shelters, pads, power, mounts, etc.)	Fall 2020
Complete installation of site infrastructure	Winter 2020/Spring 2021
Acquire instruments	Winter 2020/Spring 2021
Install shelters, analyzers, and associated equipment	Spring 2021
Develop data management system	Winter/Spring 2021
Develop internal and public-facing websites and notification system	Winter/Spring 2021
Conduct final monitoring system checks (including gas testing and confirming data flow)	Summer 2021
Start monitoring and reporting	Summer 2021 (1 year from approval)
Operate, maintain, and audit equipment, data system, website, and notification system; perform daily data checks.	Summer 2021; continuous

Appendix A. Quality Assurance Project Plan

Draft Quality Assurance Project Plan

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June 29, 2020

Approvals

Quality Assurance Project Plan Fenceline Monitoring for the Kern Oil & Refining Co.

Signature

Date

Name

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Contents

- 1. Project Background and Management 1
 - 1.1 Background 1
 - 1.1.1 Purpose..... 1
 - 1.1.2 Rationale 1
 - 1.2 Roles and Responsibilities 1

- 2. Measurements..... 5
 - 2.1 Instrument Selection and Descriptions 5
 - 2.2 Monitor Siting Overview 7
 - 2.3 Instrument Operations and Maintenance 9
 - 2.3.1 UV-DOAS 9
 - 2.3.2 UV Fluorescence Analyzer 10
 - 2.3.3 Meteorological and Visibility Sensors 11
 - 2.3.4 Overview of Spectrum Generation, and Quality Control Parameters for Open-Path Instruments 13
 - 2.4 System Corrective Actions..... 13

- 3. Quality Objectives and Criteria..... 15
 - 3.1 Data and Measurement Quality Objectives 15
 - 3.1.1 Discussion..... 15
 - 3.2 Precision Checks, Bump Tests, and Verification 16
 - 3.2.1 Open-Path Instruments..... 17
 - 3.2.2 Point Analyzer for H₂S..... 17
 - 3.2.3 Meteorological Equipment..... 17
 - 3.2.4 Instrument or Standards Certifications 19

- 4. Data Management, Quality Control, and Verification 21
 - 4.1 Overview of the Data Management Process 21
 - 4.1.1 QC and QA Processes 21
 - 4.1.2 Data Storage and Processing 22
 - 4.1.3 Data Delivery..... 22
 - 4.2 Automated Quality Control 22
 - 4.3 Routine Data Verification..... 25
 - 4.3.1 Confirm Daily Operation..... 25
 - 4.3.2 Assess Data Reasonableness 25
 - 4.4 Data QA Procedures..... 25
 - 4.5 Instrument QC Checks 27
 - 4.6 Independent Quality Oversight 28

- 5. Standard Operating Procedures..... 29

Figures

1. Organizational chart for the Kern refinery monitoring project.....	2
2. Location of sensors and measurement paths at the Kern Refinery.....	8

Tables

1. Pollutants listed in Table 1 of Rule 4460.....	5
2. Range of approximate instrument minimum detection limits in parts per billion by technology and species.....	6
3. Locations of equipment to be used in fenceline monitoring program at the Kern refinery.....	7
4. Schedule of maintenance activities for the UV-DOAS.....	10
5. Schedule of maintenance activities for an H ₂ S UV fluorescence analyzer.....	11
6. Schedule of maintenance activities for the meteorological tower.....	12
7. Typical schedule of maintenance activities for the visibility sensor.....	12
8. Potential sampling and data reporting problems and corrective actions.....	14
9. Data completeness objectives.....	15
10. Performance criteria for the fenceline monitoring systems.....	16
11. Initial screening checks for 5-minute data.....	24
12. Typical instrument QA/QC checks.....	28

1. Project Background and Management

1.1 Background

1.1.1 Purpose

Kern Oil & Refining Co. (Kern) will conduct air quality monitoring at its Bakersfield, California, refinery in response to the San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 4460.¹ The monitoring will follow a facility-specific air monitoring plan consistent with the SJVAPCD's Refinery Fenceline Air Monitoring Plan requirements. Rule 4460 requires routine monitoring near the fencelines of all San Joaquin Valley refineries for specific air pollutants, with data reported to the public.²

1.1.2 Rationale

Rule 4460 requires real-time fenceline monitoring systems that provide air quality information to the public regarding concentrations of various air pollutants, which could include criteria air pollutants and toxic air contaminants, at or near property boundaries of petroleum refineries.¹ In its monitoring plan, Kern will conduct open-path and point monitoring of pollutants and meteorological measurements to meet the regulations.

This quality assurance project plan (QAPP) documents the measures that the project team will take to ensure that the data collected are of the highest quality. This document will be reviewed annually and updated as needed.

1.2 Roles and Responsibilities

This project involves refinery staff; contractors; and quality-assurance, field, and website personnel. **Figure 1** shows an organization chart for the project.

¹ San Joaquin Valley Air Pollution Control District (2019) Rule 4460: Petroleum refinery fenceline air monitoring. Final rule adopted December 19, 2019. Available at <https://www.valleyair.org/rules/currnrules/4460.pdf>.

² The exact timing for the start of fenceline monitoring depends on when the monitoring plan is approved by the SJVAPCD.

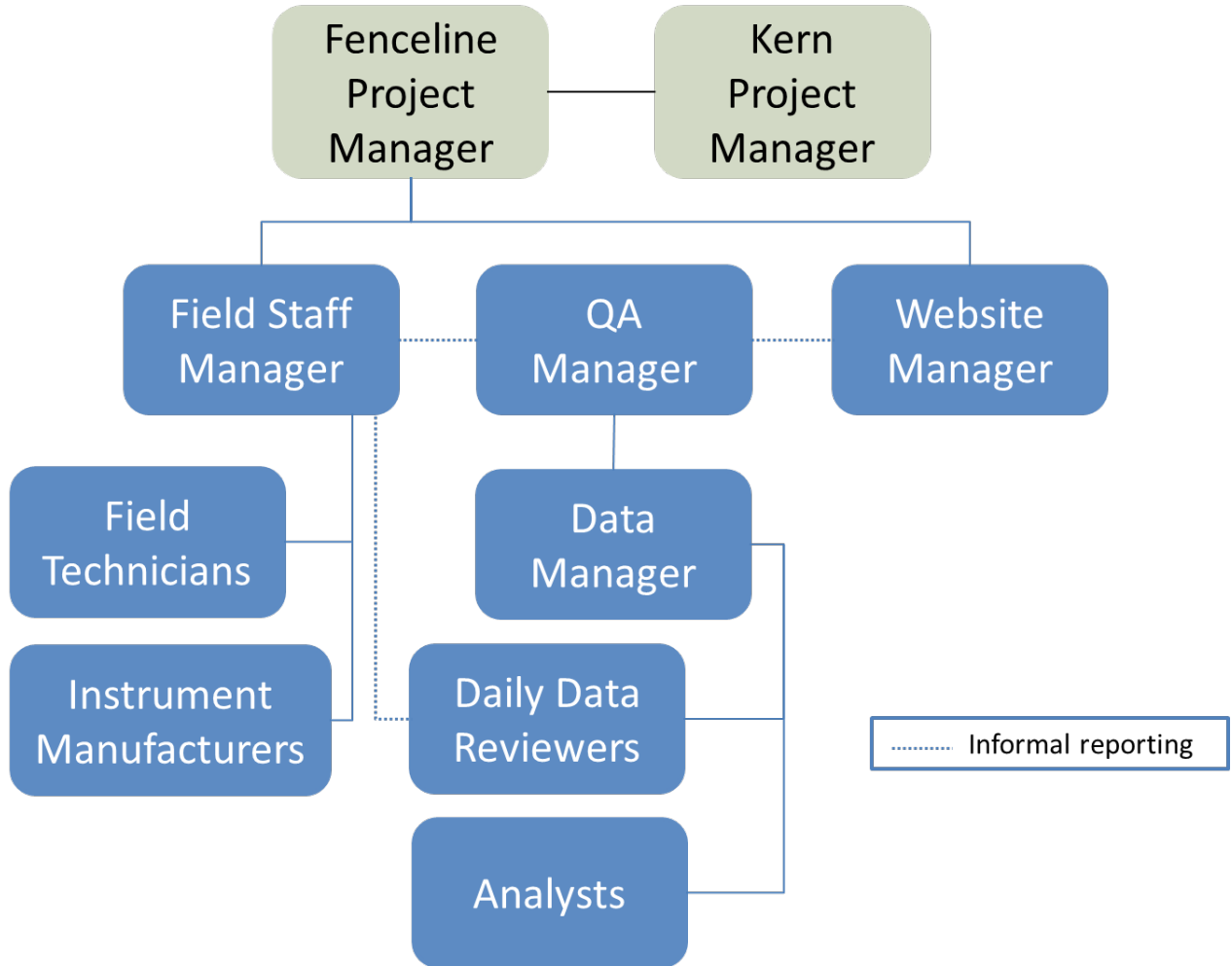


Figure 1. Organizational chart showing key roles for the Kern refinery monitoring project.

The overall project will be run by a **Fenceline Project Manager (PM)** appointed by the refinery. The Kern PM acts as the central point of contact for the SJVAPCD. The same staff member may perform multiple roles within the fenceline monitoring program. For instance, the Fenceline PM may perform some of the duties or act as the QA Manager, the Field Staff Manager, the Data Manager, and/or the Website Manager. The Fenceline PM is responsible for overseeing the project and reporting to the Kern PM.

The **QA Manager** is responsible for ensuring the quality of data collected in this project. The QA Manager oversees data collection and review, provides QA oversight during the study, and oversees and reports on QA activities to the Fenceline Project Manager and SJVAPCD QA Officer. The QA Manager oversees daily data review and data management; works with the Field Staff Manager to ensure that any data issues are addressed promptly by the field technicians; and works with the Website Manager to ensure that data provided to the public are of high quality.

The **Field Staff Manager** ensures that field technicians (site operators) are meeting the requirements of the project. The Field Staff Manager coordinates staff coverage and serves as a technical resource for site measurements.

Field Technicians/Site Operators perform instrument maintenance. The technicians ensure that all measurements are collected in accordance with standard operating procedures (SOPs), standard methods, and regulations, where applicable. Technicians perform the required quality checks on instruments and document all work in site logs.

The **Instrument Contractors** provide technical support for the instruments deployed in the field.

The **Data Manager** is responsible for ensuring that daily data review is conducted, that data that fail auto-screening are inspected, and that data validation follows the proper schedule and procedures. The Data Manager is also responsible for delivering the validated data to the PM.

Daily data review and data validation are conducted by experienced air quality analysts. The **Data Reviewers** communicate with the Data Manager when there are issues and may also interact with the Field Technicians when they notice an issue that needs to be addressed.

The **Website Manager** is responsible for properly displaying data on the website, managing inquiries from the public, and ensuring that validated data are available for download on a quarterly basis. Automated alerts will notify the Website Manager when the real-time data are not available on the website. This manager will be responsible for assessing and fixing data communication and other information technology-related issues concerning the website and data system.

2. Measurements

2.1 Instrument Selection and Descriptions

The required list of compounds to be measured is presented in [Table 1](#). These compounds will be measured at a 5-minute resolution. Because of the distances that need to be covered by measurements (hundreds of meters), the data time-resolution requirements (5 minutes), and the current state of measurement technology, open-path Ultra Violet-Differential Optical Absorption Spectroscopy (UV-DOAS) instruments were selected for measuring most compounds. The exception is H₂S, which will be measured by UV Fluorescence point instruments.

Table 1. Pollutants listed in Table 1 of Rule 4460.

Air Pollutants
Criteria Air Pollutants
Sulfur Dioxide
Volatile Organic Compounds (VOCs)
Benzene
Toluene
Ethylbenzene
Xylenes
Other Compounds
Hydrogen Sulfide

Along all measurement paths, SO₂ and benzene, toluene, ethylbenzene, and xylenes (BTEX) will be measured by monostatic UV-DOAS instruments with a xenon light source that shines over a long path to a retroreflector and thus back to the instrument for analysis. The xenon light is required to (1) take measurements over paths that are about 300 to 600 meters long, and (2) achieve the minimum detection limits (MDL) for BTEX concentrations. The analyzer records the intensity of light at discrete wavelengths, and any UV-absorbing gas that is present in the beam absorbs at a specific wavelength of light. The analyzer compares regions within the sample absorbance spectra to the same regions within the reference absorbance spectra, using least squares regression analysis. Beer's Law is used to report gas concentrations. Closeness of fit is indicated by the correlation coefficient (R²) of agreement between the measured spectra and the reference spectra. The R² is provided with each concentration so that interference can be detected if it is present. The selection of regions of analysis that are free of absorbance due to other gases within the sample is the primary means of avoiding

cross-interference. Spectral subtraction is used in cases with overlapping absorbance features; the subtraction technique is proprietary to the instrument manufacturer.

In the northeast and southeast corners of the measurement paths, two UV fluorescence point analyzers will be used to measure H₂S.

Table 2 summarizes the estimated MDL for each species by a typical open-path and point UV instrument. For the open-path analyzer, the MDL is the lowest path-average concentration that can be measured at the path length. A 500-m path length was used in MDL calculations. Detection limits are approximate and are based on the theoretical capabilities of the instruments; however, they are supported by manufacturers' lab tests and real-world applications. Actual detection limits depend on atmospheric conditions and on the specific instrument used.

Table 2. Range of approximate instrument minimum detection limits (MDL) in parts per billion (ppb) by technology and species. Actual detection limits depend on atmospheric conditions.

Analyzer Detection Method	Compounds Measured	Instrument Detection Limit*
UV Fluorescence	H ₂ S	<0.5 ppb
UV Differential Optical Absorption Spectroscopy (UV-DOAS)	Benzene	<0.5 ppb
	Toluene	<1.0 ppb
	Ethylbenzene	<0.5 ppb
	Xylenes	<0.5 ppb (m/p); <4.0 ppb (o)
	SO ₂	<1.0 ppb
Infrared forward-scattering	Visibility	Range = <20 ft to 46 miles
Resistance thermometer Capacitive polymer	Temperature	Temp range = -39.2 to 60°C
	Relative Humidity	RH range = 0.8% to 100%
Wind vane	Wind speed	Wind speed: 0-50 m/s
	Wind direction	Azimuth: 0-360 degrees

*Open-path detection limits are based on typical path length of 500 m.

2.2 Monitor Siting Overview

Kern will monitor concentrations across three open paths and two point locations (detailed in [Table 3](#) and shown in [Figure 2](#)). The type of measurement for each path is indicated by the legend in [Figure 2](#): transmitter-detectors/analyzers denoted with an “S”, retroreflectors denoted with an “R”, and point analyzers denoted with an “A”. All instruments and reflectors will be located between 2 m and 15 m above ground level depending on site logistics.

Fenceline monitoring paths were chosen for the north, east, and south edges of the refinery property after considering dominant wind patterns (most frequently from the NW and SE), sources of potential air emissions on the refinery property, and nearby local receptors. A meteorological station, mounted on a tower approximately 10 m tall, will be installed. The station will also include a visibility sensor and sensors for measuring wind speed and direction, temperature, and relative humidity.

Table 3. Locations of equipment to be used in fenceline monitoring program at the Kern refinery.

Path #	Description	Approximate Path Length (m)	Instrument(s)
1 (North-side)	East-West along Northern boundary Point analyzer in Northeast corner	200	UV-DOAS, UV Fluorescence
2 (East-side)	North-South along East boundary Point analyzer and meteorological station in Southeast corner	550	UV-DOAS, UV Fluorescence, Met. Station
3 (South-side)	East-West along Southern boundary	365	UV-DOAS



Figure 2. Location of sensors and measurement paths at the Kern Refinery. Each path consists of a transmitter-detector (S) and a retroreflector (R). Point analyzers locations (A) are in the northeast and southeast corners. The meteorology station is also shown (M).

2.3 Instrument Operations and Maintenance

The instrument systems included in this project are UV-DOAS, UV fluorescence, and meteorological instruments, including visibility sensors. Quality assurance is built into the operation and maintenance of these instruments. For all instruments, scheduled maintenance will occur monthly, quarterly, and/or annually. Daily checks will be made to (1) ensure data are flowing consistently to the data management system and public website, and (2) verify that data are reasonable. Emergency maintenance will occur as needed when problems are identified during daily data review and auto-screening of real-time data.

2.3.1 UV-DOAS

The UV-DOAS system is designed to require only modest service and maintenance. [Table 4](#) summarizes typical UV-DOAS maintenance activities as recommended by a manufacturer. Preventive maintenance frequency depends on the operating environment and may need to be adjusted beyond the manufacturers' recommendations once the instruments are deployed in the field. On an as-needed basis, system status alarms will alert operators to specific issues that need to be addressed.

Table 4. Schedule of maintenance activities for the UV-DOAS.

Activity	Monthly	Quarterly	Annually
Visually inspect the system.	✓		
Inspect optics on detector and retro-reflector; clean if necessary. Ensure there are no obstructions between the detector and the retro-reflector (such as equipment, vegetation, vehicles).	✓		
Inspect system filters.	✓		
Confirm the alignment to verify there has not been significant physical movement.	✓		
Download data from detector hard drive and delete old files to free space, if needed.	✓		
Change out the UV source.		✓	
Replace ventilation exit and intake filters.		✓	
Clean optics on detector and retroreflector.		✓	
Realign system after service.		✓	
Check system performance indicators.		✓	
Perform bump test (simulates system-observed gas content at the required path average concentration) to verify the system can detect at or below a lower alarm limit.		✓	
Review and test light and signal levels. Check average light intensity to establish baseline for bulb change frequency.		✓	
Verify system settings.			✓

2.3.2 UV Fluorescence Analyzer

Table 5 describes typical maintenance actions for a H₂S UV fluorescence point analyzer, such as cleaning and inspections, as well as their required frequencies for routine system management. Preventive maintenance ensures operational integrity and is strongly urged by the manufacturer. The frequency of maintenance checks may need to be adjusted beyond the manufacturers' recommendations once operations begin. On an as-needed basis, system status alarms will alert operators to specific issues needing to be addressed.

Table 5. Schedule of maintenance activities for an H₂S UV fluorescence analyzer.

Activity	Monthly	Quarterly	Annually
Inspect sample line tubing.	✓		
Inspect particle filter at inlet and replace as necessary.	✓		
Zero/span check.	✓		
Inspect particle filter inside analyzer and replace as necessary.		✓	
Perform flow check.		✓	
Perform gas test for analyzer response.		✓	
Replace pump diaphragm.			✓

2.3.3 Meteorological and Visibility Sensors

Meteorological sensors provide information about temperature, relative humidity, and wind direction and wind speed to help determine sources of any air contaminants. The meteorological sensors will be maintained on a monthly and biannual basis. **Table 6** lists the maintenance activities that will be performed.

Table 6. Schedule of maintenance activities for the meteorological tower.

Item	Activity	Monthly	Biannually
Tower	Check that the tower is securely anchored to the shelter.	✓	
	Check the tower for signs of damage or excessive wear.	✓	
	Inspect all bolts at the tower base for any signs of corrosion (rust).	✓	
	Check the tower’s vertical alignment.	✓	
Anemometer	Note whether any component (tail, propeller) is missing or has suffered obvious damage.	✓	
	Check that the whole sensor moves freely with a changing wind direction and the propeller rotates freely when windy.	✓	
Temperature/ RH Sensor and Shield	Inspect the hardware holding the temperature/RH sensor shield assembly to the tower and tighten the bolts if necessary.	✓	
	Check that the cable connections are secure.	✓	
All sensors	Calibration		✓

Visibility measurements will be made in order to provide operational verification of fog events. Maintenance activities for the visibility sensor are included in [Table 7](#). Monthly maintenance includes inspecting the sensor for dirt, spider webs, birds’ nests, or other obstructions, and cleaning the sensor if necessary. The sensors are calibrated in the field annually using a manufacturer-specific calibration kit.

Table 7. Typical schedule of maintenance activities for the visibility sensor.

Activity	Monthly	Annually
Visually inspect the system, including all cables. Clear out any obstructions and clean the glass windows.	✓	
Check that the cable connections are secure.	✓	
Perform the zero and light-level calibration.		✓

2.3.4 Overview of Spectrum Generation, and Quality Control Parameters for Open-Path Instruments

This section provides context for some of the parameters used in QA/QC procedures for open-path systems. Most open-path monitors generate an absorption spectrum; from this spectrum, concentrations are derived. The analyzer produces a spectral file containing absorbance as a function of wavelength. To generate absorbance using UV-DOAS, the logarithm of the ratio of two “single beam” transmission spectra is calculated (one spectra being the sample, and the other being the “background”). For ambient open-path measurements, one single beam must be measured or estimated using a spectrum that does not contain the analyte of interest—this is the “background.” Different manufacturers have different methods for determining the appropriate background. In practice, the single gas MDL for one analyte in otherwise clean air will be lower than that for air that contains interfering species (species that absorb in the same spectral region as the analyte). Also affecting the MDLs is the total averaging time. The greater the number of scans averaged, the lower the MDL due to the reduction of noise. Several other parameters obtained during the collection of spectra may be used to quality-control the data.

For UV-DOAS measurements, light is collected for a period of time (the so-called “integration time”). The instrument software determines the integration time, based on a minimum amount of light needed. Long integration times can indicate low light levels and can be used to flag data as questionable (due to the presence of fog or an object blocking the beam). For example, each manufacturer specifies a range of acceptable integration times for their system. A related metric that is applicable to all open-path measurements is the overall intensity of the light received at the analyzer; this is termed “signal strength.” For certain UV-DOAS measurements, signal strengths greater than 92% are generally acceptable; below these values, the data will be flagged as questionable.

In order to derive concentrations, spectra must be fit using a least squares procedure. A “library” spectra of known compounds is used to best fit the experimental spectra collected at the monitoring site. The goodness of fit is quantified using the well-known R^2 value, which is equal to 1 for a perfect fit and zero for a measurement that is not correlated to the library spectra. Some instrument manufacturers use the term “percent match,” which is $100 \times R^2$. Therefore, a positive detection of an analyte must satisfy an R^2 threshold value. For example, the fit to methane might have an R^2 of 0.70 or greater to be considered a valid detection.

2.4 System Corrective Actions

When a major problem is discovered with the fenceline monitoring system, corrective actions and maintenance procedures are required. Because the fenceline monitoring system is composed of two major components—field hardware and the website software—two separate rotating teams will work to respond to any issues. Corrective action will be taken to ensure that data quality objectives are

met. **Table 8** lists the types of issues that require corrective actions. This table is not all-inclusive, and additional checks may be added as the project progresses. The daily data reviewers will review data to identify issues, and will work with the field technicians and instrument contractors to resolve issues that need to be addressed on site.

Table 8. Potential sampling and data reporting problems and corrective actions.

Item	Problem	Action	Notification	Person Responsible
Erratic data	Possible instrument malfunction	Contact Field Manager and Instrument Contractor	Document in logbook, notify Field Manager	Field Technician
Power	Power interruptions	Check line voltage, reset or restart instruments	Document in logbook, notify Field Manager	Field Technician
Data downloading	Data will not transfer to the DMS	Contact Field Manager and Instrument Contractor	Document in logbook, notify Field Manager and Website/Data System Manager	Field Technician
Supplies and consumables	Essential supplies run low	Contact Field Manager	Document in logbook, notify Field Manager	Field Technician
Access to sites	Technician cannot access the sites	Contact Project Manager	Document in logbook, notify Project Manager	Field Technician
Instrument Light level	A low light level alert is observed	Site visit for realignment or source replacement - possible manufacturer support	Document in logbook, notify Field Manager	Field Technician
Website	Website is down	Contact Website Manager	Notify Project Manager	Website Manager

3. Quality Objectives and Criteria

3.1 Data and Measurement Quality Objectives

3.1.1 Discussion

To ensure success of field measurements, measurement performance criteria are established as part of the monitoring design. These criteria specify the data quality needed to minimize decision errors based on the data. Data quality is defined in terms of the degree of precision, accuracy, representativeness, comparability, and completeness needed for the monitoring. Of these five data quality indicators, precision and accuracy are quantitative measures, representativeness and comparability are qualitative measures, and completeness is a combination of quantitative and qualitative measures.

The quantitative performance criteria for the data collected by the fenceline measurement systems are provided in the following tables. The principal quantitative indicators of data quality for this study are data completeness, precision, and accuracy. **Table 9** shows the data completeness objectives for all collected data for several time intervals. For communication purposes, the Percent Data Valid—the percentage of data values that are valid divided by the number of captured data values, corrected for low-visibility conditions—will also be computed.

Table 9. Data completeness objectives.

Completeness Requirement	Relevant to
50% of scans (open-path) or of data (point monitors)	5-minute average data
75% of 5-minute data	1-hr average data
75% of daily data	Monthly, quarterly, or annual average data

Other factors that affect data availability include instrument bump tests (approximately every quarter for a few hours), annual maintenance, and other maintenance (e.g., replacement of UV bulbs for the UV-DOAS after every 2,000 hours of use, roughly quarterly). Regular maintenance and careful, responsive operation will minimize instrument downtime. **Table 10** shows the performance criteria for the fenceline monitoring systems.

Table 10. Performance criteria for the fenceline monitoring systems.

Sensor	Test	Acceptance Criteria for Precision and Accuracy
UV-DOAS	100 ppm p-xylene; internal flow-through QA	±25%*
H ₂ S point analyzer	0, 250, 150, 50 ppb	±20%
Temperature	Two point test	±0.5°C
Relative Humidity	Hygrometer	±7%
Wind Speed	Starting threshold test; transfer function test	±0.25 m/s below 5 m/s and ± 5% above 5 m/s
Wind Direction	Angle verification	±5 degrees
Visibility	Extinction	±10%

*Based on flow-through calibration system.

3.2 Precision Checks, Bump Tests, and Verification

All measurements outlined here are subjected to precision and accuracy tests. During these tests, a number (N) of replicated measurements (x_i) of a standard reference material of known magnitude (x_{std}) will be measured. Here, an acceptable number of trials will be defined as $N \geq 15$. The average value of these measurements is calculated as

$$\bar{x} = \frac{\sum_i x_i}{N} \quad (1)$$

and the standard deviation (σ) as:

$$\sigma = \sqrt{\frac{\sum_i (x_i - \bar{x})^2}{N-1}}. \quad (2)$$

From these definitions, %Accuracy is defined as:

$$\%Accuracy = \frac{\bar{x} - x_{std}}{x_{std}} \times 100\% \quad (3)$$

and precision as the coefficient of variation (CV) expressed as a percentage:

$$Precision \equiv \%CV = \frac{\sigma}{\bar{x}} \times 100\% \quad (4)$$

3.2.1 Open-Path Instruments

For the UV-DOAS system, a bump test will be performed quarterly using a flow-through cell the first year or so and semi-annually in later years as high-quality, reliable system performance is confirmed. In the field, a bump test (simulates system-observed gas content at the required path average concentration) is used to verify that the system can detect concentrations at or below a set level of concern.

For the open-path systems, precision will be measured by evaluating the variance of pollutant concentrations during a period of low variability, when atmospheric influence on variability is assumed to be minimal. Five-minute data will be selected during periods of low variability, but when concentrations are well above the MDL. The precision can then be evaluated by calculating the coefficient of variation (CV) during the period of low variability, as shown in [Equation 4](#) on the previous page. If there are no periods of low variability with concentrations above the MDL, bump test data will be used to calculate precision.

3.2.2 Point Analyzer for H₂S

A gas dilution calibrator is used to delivery calibration gas to the UV fluorescence H₂S analyzer. A certified gas cylinder of H₂S (approximately 5 ppm) and source of zero air (cylinder or generator) will be connected to the dilution calibrator to generate a range of concentration set points. On a monthly basis, the analyzers will be checked against a zero set point and a span (concentration of about 150 ppb). Full calibrations will be done quarterly and include a range of concentrations: 0 ppb, 50 ppb, 150 ppb, 250 ppb.

3.2.3 Meteorological Equipment

Semi-annual audits will be conducted for the meteorological stations. The meteorological instrumentation calibrations will be conducted with reference to the recommendations in the EPA's *Quality Assurance Handbook for Air Pollution Measurement Systems (QA Handbook), Volume IV*.³

As part of the calibration process, each instrument will be first tested to determine whether it is operating within the prescribed operational limits and whether non-routine maintenance or adjustments are required. Based on an instrument's response to the initial performance test with respect to the minimum acceptable performance criteria, the instrument would then be repaired, calibrated, or in rare cases, replaced. A standard form will be used to document the performance of each sensor before and after any adjustments.

³ U.S. Environmental Protection Agency (2008) Quality assurance handbook for air pollution measurement systems, Volume IV: meteorological measurements version 2.0 (final). Prepared by the U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Air Quality Assessment Division, Research Triangle Park, NC, EPA-454/B-08-002, March. Available at <https://www3.epa.gov/ttn/amtic/qalist.html>.

Wind Speed

An anemometer drive will be used to simulate known wind speeds. The propeller torque disc will be used to determine the anemometer starting threshold. Sensor starting threshold is a shaft-bearing efficiency measurement only.

The wind speed propeller and tail assembly will be visually inspected to ensure that they are not cracked or damaged. The propeller will be removed and the sensor shaft immobilized to simulate zero wind speed. The anemometer drive will be connected to the sensor shaft to simulate wind speeds between 0 and 44.1 m/s. The wind speed will be determined from wind speed coefficients provided by the manufacturer. The remote processing unit (RPU) responses will then be compared to the calculated values.

Wind Direction

A vane angle fixture will be used to set the vane to known directions at 45-degree intervals, moving clockwise and then counter-clockwise, through the full 360-degree range of the monitor. A pocket transit mounted on a tripod will be used in conjunction with a vane alignment rod to determine the orientation of the wind monitor on the tower mast. A vane torque gauge will be used to determine the vane starting threshold.

Ambient Temperature

A NIST-traceable thermometer will be used as the calibration transfer standard. The ambient temperature sensor will be tested by comparing the current ambient temperature, as measured by the digital thermometer, to the temperature reading from the RPU. The transfer standard will be placed near the temperature probe in a shaded location. Both sensors will be allowed to reach equilibration before the responses of the respective sensors are recorded.

Relative Humidity

A NIST-traceable psychrometer will be used as the calibration transfer standard. The relative humidity sensor will be tested by comparing the current relative humidity as measured by the psychrometer to the relative humidity reading from the RPU. The psychrometer will be placed near the temperature probe in a shaded location. Both sensors will be allowed to reach equilibration before their responses are recorded.

Visibility Sensors

An appropriate manufacturer-specific calibration kit will be used to test the visibility sensors. The calibration fixtures are instrument-specific. Generally, a calibration kit consists of a blocking plate or

block for checking the sensor zero, and a scatter plate for checking the sensor span. The calibration fixture is assigned a factory-traceable extinction coefficient (ECO) used to calculate the expected values during calibrations.

3.2.4 Instrument or Standards Certifications

For factory calibrations, a certification of the standard gases used will be requested from the manufacturer. Standards will not be used past their expiration date. If an expired standard is used, it shall be recertified by the manufacturer. The spectral file numbers generated during tests will be documented and archived.

4. Data Management, Quality Control, and Verification

Data quality criteria are evaluated through (1) automatic data checks conducted through the data management system and (2) data review by trained analysts (daily data review and periodic, more thorough validation).

4.1 Overview of the Data Management Process

Raw data management occurs on a real-time, daily, monthly, quarterly, and annual basis. In near-real time, data are transferred from infield instruments through a data acquisition system (DAS) to a Data Management System (DMS) using cellular modem. Data are also stored onsite on instrument computers in case of cell modem failure. The DMS uses a Microsoft SQL relational database with stored procedures. These raw data are not yet intended for the public website.

4.1.1 QC and QA Processes

All data produced by the instruments are initially considered **Level 0**. All **Level 0** data values that are not associated with bump tests, other instrument maintenance, or instrument problems will be displayed to the public in near-real time. If data are subsequently proven to be invalid, they will be removed from the public display.

As described in Section 4.2, the DMS automatically quality-controls data, detects outliers and problems, generates reports, and creates alerts. The auto-screening capabilities of the DMS will be used for continuous examination of data quality. As part of the auto-screening process, quality control flags are assigned as follows:

- **Valid** – data are within normal operating parameters.
- **Invalid** – data do not meet quality control criteria.
- **Missing** – data have not been received by the DMS for a time period greater than 10 minutes since the last data was received.
- **Suspect** – operating parameters are marginal and should be reviewed further.

The automatically quality-controlled air quality data will be displayed on the public website within 10 minutes after collection. At this point, these data are considered **Level 0.5**.

Further routine verification of the data is described in Section 4.3. The DMS serves a non-public operations website that is used for daily graphical review of the data by experienced analysts. The DMS also has a notification system to inform/alert project and facility staff of problems. After this routine data review is complete, data are considered **Level 1.0**.

During the last phase of data verification, data from longer time periods are validated by executing various QA procedures (described in Section 4.4) and instrument QC checks (described in Section 4.5). After these in-depth checks are complete and the data are annotated appropriately, the resulting data is considered **Level 2.0**. At this point, the data is considered final for reporting to the SJVAPCD. Data from all stages of validation are retained in the DMS.

4.1.2 Data Storage and Processing

The DMS data will be backed up on a daily basis. Backup media will be moved weekly to a secure offsite facility. The data will be stored for a period of five years after sampling.

4.1.3 Data Delivery

Final data sets (Level 2.0 data) will be compiled quarterly, within 30 days after the close of each quarter, and made available to the public on the website in graph format. Validated data will be provided to the SJVAPCD quarterly.

Data graphs will be stored and available on the website for 90 days. Kern will maintain a data record for five years consistent with Rule 4460.

4.2 Automated Quality Control

Automated data screening is conducted within the DMS upon data ingest. Automated screening checks of data feeds are used to screen out invalid data for public display and are helpful to focus the data reviewer's efforts on the data that need the most attention. Initial screening checks, along with actions to be taken, are summarized in [Table 11](#). The screening check concentration criteria are based on an analysis of expected instrument performance, concentration levels of concern by compound, and typical ambient concentrations by compound. All screening criteria (flags and rates of change) are preliminary and will be refined during the project based on actual observations. The DMS auto-screening checks that will be used include:

- **MDL.** Set up to check if data collected are above the reported detection limit of the analyzer. If the data is below the detection limit, it will be flagged as such.

- **Range.** These checks will verify that the instrument is not reporting values outside of reasonable minimum and maximum concentrations.
- **Sticking.** If values are repeated for a number of sampling intervals, data will be reviewed for validity. Typically, four or more intervals of sticking values are a reasonable time span to indicate that investigation is needed. Sticking checks will not be applied to data below the instrument detection limit.
- **Rate of Change.** Values that change rapidly without reasonable cause will be flagged and reviewed.
- **Missing.** If data are missing, data during those time periods will be coded as missing.
- **Sensor OP codes and alarms.** If the instrument assigns operation (OP) codes to data automatically (e.g., for bump tests, internal flow rate checks, light extinction criteria, integration time criteria), the data will be reviewed, codes confirmed, and data flags checked.
- **Visibility impairment.** While the exact relationship between visibility and open-path measurements is not established, the expectation is that there would be no measurements when visibility is less than the twice the path length (two times the path length is used because the open-path sensor light travels to the mirror and back to the analyzer).

Additional parameters that may be monitored as indicators of data quality include data quality value for each concentration as reported by the instrument (i.e., correlation between measured and reference spectra), signal strength, wavelength versus intensity, and visual review of peaks. There are no previously set data quality objectives for these parameters; we will need to develop objectives for these parameters if we find that they are useful indicators for automated data quality screening or for data validation.

Data flags identified through auto-screening will be graphically reviewed during data validation (i.e., not in real time), and QC flags will be updated with daily and quarterly actions. DMS keeps track of data changes in its chain-of-custody feature—i.e., raw data are preserved as well as all changes.

Table 11. Initial screening checks for 5-minute data. All valid and suspect data values will be displayed to the public in real time. If data are invalid, they will not be included in the public display. All screening values below (flags and rates of change) are preliminary and will be refined during the project. During data validation, flagged data will be further investigated.

Measurement Species (units)	Checks						
	Minimum Detection Limit (MDL): If concentration is below MDL, flag as below MDL	Range: If concentration is above value listed, flag as suspect and conduct investigation	Sticking: If same value observed for four or more intervals, flag as suspect and conduct investigation	Rate of Change Between Intervals: If concentration changes by more than value listed, flag as suspect and conduct investigation	Missing: If data are missing, flag as missing and investigate cause	Sensor OP Code/Alarm: If sensor indicates malfunction or bump test data, flag as appropriate	Visibility: If visibility is less than 1,000 m and data are missing, flag as appropriate
SO ₂ (ppb)	SAME FOR ALL POLLUTANTS	750	SAME FOR ALL POLLUTANTS	250	SAME FOR ALL POLLUTANTS	SAME FOR ALL POLLUTANTS	SAME FOR ALL POLLUTANTS
Benzene (ppb)		27		9			
Toluene (ppb)		29,400		9,800			
Ethylbenzene (ppb)		1,380		460			
Total Xylenes (ppb)		15,000		5,000			
H ₂ S (ppb)		90		30			
Visibility (meters)	If value is <0, flag as suspect	1,000	Not applicable	Not applicable			Not applicable

4.3 Routine Data Verification

4.3.1 Confirm Daily Operation

Operationally, data are reviewed daily by a data reviewer to assess instrument operation. This process leads to Level 1.0 data. This initial review, typically of a three- to five-day time-series plot of selected parameters for each instrument, allows the analyst to see common problems and verify instruments are operational. If it appears that an instrument is not operating, or the data are missing, the field operator will be notified and further investigation and corrective action, if needed, will be taken.

In addition to daily checks of the field website, an automated alerting system will let technicians and managers know when data have been missing for a specified period of time. Missing data may indicate a power issue, an instrument problem, or a data communication problem. The time period allowed for missing data will likely be adjusted as the project proceeds to reduce false or excessive alerting. The alerting will likely be set initially for 6 to 12 missing 5-minute values (i.e., 30 to 60 minutes).

4.3.2 Assess Data Reasonableness

Also operationally, the data reviewer quickly assesses whether the pollutant concentrations are reasonable with respect to the time of day, season, meteorology, and concentrations expected and observed along other paths. If anomalies are observed, additional analysis will be conducted to determine whether there is an instrument malfunction or the data are truly anomalous but explainable. Data reasonableness is also assessed more thoroughly during the data validation process.

4.4 Data QA Procedures

On a quarterly schedule, an experienced air quality analyst will validate data by building on the processes leading to Level 1.0 data. This process starts with an in-depth review of the data, which includes statistical tests to ensure the data are valid for the intended end use. The QA Manager will evaluate QA/QC procedures and ensure the methods for meeting data quality objectives are adhered to. Data validation activities will be reviewed and approved by the QA Manager.

Quarterly data validation activities include:

- Looking for statistical anomalies and outliers in the data and investigating them.
- Ensuring there are not several continuous 5-minute averages of the same number.
- Evaluating monthly summaries of the minimum, maximum, and average values.
- Ensuring the data are not biased by exceptional conditions or events occurring off refinery property.

- Ensuring data reasonableness by comparing the data to remote background concentrations and average urban concentrations.
- Ensuring the data or measurements are realistically achievable and not outside the limits of what can be measured.⁴
- Inspecting several sampling intervals before and after data issues or instrument bump tests or repairs to ensure all affected data have been properly flagged.
- Referring to site and operator logbooks to see if some values may be unusual or questionable based on observations by site operator.
- Assessing instrument meta-data to confirm reasonableness.
- Assessing visibility measurements to ensure adequate signal was obtained to quantify pollutant concentrations.
- Confirming that bump tests were conducted and were within specifications.

On a quarterly basis, to ensure all the daily QC tasks are complete, analysts will:

- Review any instrument bump test results (see Section 4.5).
- Verify that daily instrument checks were acceptable.
- Review manual changes to operations/data, and verify that the changes were logged and appropriately flagged.
- Ensure that instrument checks have the appropriate QC codes applied.

On a quarterly basis, analysts will subject the data to final QC by filling in missing records with null values and adding Null Codes. Analysts will:

- Assign invalid data a Null Code, which are assigned to give data a reason for being invalid.
- If a record is not created for a particular site/date/time/parameter combination, create a null record for data completeness purposes.
- Inspect data consistency over three months.
- Review ranges of values for consistency – ranges should remain consistent over months of monitoring.
- Check bump test values for consistency.
- Review quarterly data completeness.

General criteria for suspecting or invalidating data include:

- Monitor appears to have malfunctioned (acting erratic, spiking, or showing other evidence of questionable operation).
- Data are outside of plausible values (indicating a calculation error, averaging error, or instrument malfunction).

Common reasons for data invalidation include instrument malfunction, power failure, and bump test data that were not identified as such. As the measurements progress, screening checks will be

⁴ Measurements below the method detection limit will be flagged in the DMS for review by an analyst.

updated and refined. Screening checks are typically specific to the site, instrument, time of day, and season, and will be adjusted over time as more data are collected.

Data are invalidated only if a reason can be found for the anomaly or automated screening check failure. If the data are anomalous or fail screening but no reason can be found to invalidate the data, the data are flagged. Additional analysis may be needed to deem data valid or invalid. Voided data will be flagged as invalid in the database. A summary of issues leading to invalidated data will be documented in the data file.

All actions will be documented in the DMS, which retains raw data and traceability of all actions that result in the final data. At the conclusion of activities covered in this section, the data are considered Level 2.0 data.

4.5 Instrument QC Checks

Additional QC checks for the instruments are summarized in [Table 12](#). Data that fail checks will be flagged in the DMS and brought to the attention of the reviewer by color coding the graphic summaries.

On an annual basis, the refinery or its designated contractor will review the performance of the network by (1) reviewing the data completeness by monitoring path, instrument, and species; (2) reviewing results of bump tests; (3) analyzing the reported values in context of refinery operations; and (4) analyzing the data in context of the meteorology. The contractor will also use analyses similar to those used to support the network design to evaluate the overall network performance and ensure it is meeting overall objectives. The results will be summarized in a technical memorandum and provided to the SJVAPCD upon request.

Table 12. Typical instrument QA/QC checks.

QA/QC Checks	Frequency	Acceptance Criteria
UV-DOAS		
Bump test (accuracy)	Quarterly and after major service	±25%*
Baseline stability	Continuous	±5%
Measurement quality (R ²)	Continuous	0.8 to 1.0
Integration time	Continuous	80-200 mS <i>400 mS integration time results in a warning notification</i>
Signal intensity	Continuous	>80% <i>Signal intensity below 30 results in a warning notification</i>
UV Fluorescence H₂S Analyzer		
Bump test	Quarterly	20%
Meteorology		
Two point temperature test	Quarterly	±0.5°C
Relative humidity	Quarterly	±7%
Wind speed starting threshold and transfer function	Quarterly	±0.25 m/s below 5 m/s and ±5% above 5 m/s
Wind direction angle verification	Quarterly	±5 degrees
Visibility – extinction coefficient check	Quarterly	±10%

*Based on flow-through calibration system.

4.6 Independent Quality Oversight

As part of implementing quality assurance, Rule 4460 requires independent audits of the fenceline monitoring system. Kern will work with contractors or SJVAPCD to perform external annual systems audits that include the following elements:

- Audits or bump tests of instruments, following the criteria outlined in Sections 3 and 4 of this QAPP
- Audit of data flow from the instrument to website

5. Standard Operating Procedures

Standard Operating Procedures for maintenance and audits of the UV-DOAS instrument, the UV fluorescence analyzer, visibility sensor and meteorological sensors will be provided here, once final instrument determinations are made.

APPENDIX

Summary of Public Comments and District Responses for Proposed Fenceline Air Monitoring Plan

January 28, 2021

SUMMARY OF COMMENTS

January 28, 2021

The District published and noticed the proposed fence-line air monitoring plan for Kern Oil & Refining Co. on August 13, 2020. The following written comments were received during the public comment period from the following: Comité Progreso De Lamont; Committee for a Better Arvin; Committee for a Better Shafter; Association Of Irrigated Residents; Center on Race, Poverty & the Environment; Central Valley Air Quality (CVAQ) Coalition; Central California Environmental Justice Network; Lost Hills In Action; Clean Water Action; and Earthjustice.

1. **Comment:** The coverage gap on the west side of the refinery fenceline ignores nearby residences, dominant wind direction modeling, and emission sources. The Plan provides for partial fenceline air monitoring on the east side, and part of the south and northeast areas of the refinery. The Plan states in general terms that these three “paths along the northeast, east, and south sides of refinery cover all near-downwind communities” and that “[t]here are no nearby residences or sensitive receptors to the west.” Moreover, the Plan asserts that “no monitors are needed on the western property boundary because the wind rarely blows in this direction” of the refinery. The Plan’s assertion that the western area does not require monitoring contradicts other findings in the Plan.

First, there are residences northwest of the refinery. The Plan asserts that these homes are not “nearby” and fails to provide specific distances. In fact, these residences are within one mile of the refinery’s western property boundary from the rail unload and storage areas. Second, modeling in the Plan confirms that southeast winds are dominant at least 15 percent of the time, which would move pollutants northwest towards these residences. The proposed monitoring system would fail to measure pollutants as they cross the fenceline and into these adjacent communities both during routine operations and malfunctions. Finally, the Plan notes continuous emission sources exist on the west side of the refinery (i.e., rail unload and storage areas).

The Plan fails to provide dispersion modeling and the amount and type of releases from these sources at the refinery. These sources routinely release pollutants into northwest residences, in addition to releases from other sources traveling northwest. Given these reasons, it is necessary for the Plan to include fenceline air monitoring on the west side of the refinery to ensure accurate and complete results.

Response: The predominant wind direction blows from northwest to southeast. The proposed plan provides monitoring on the north, east, and south fence lines. This provides sufficient coverage for the residences located predominantly downwind from the refinery and therefore satisfies the requirements of District Rule 4460.

2. **Comment:** The Plan fails to explain the significant coverage gaps around the perimeter of the refinery property containing equipment and tanks. The Plan relies on dominant wind modeling (i.e., wind roses) to establish monitoring paths. Based on this modeling, the dominant wind patterns are from the northwest and southeast. As discussed below, these wind patterns are not constant conditions. In fact, the Plan admits that there are fluctuations in these wind patterns noting “variable winds also occur and are most frequent in the overnight and morning hours and more often occur in the winter.” Moreover, these northwest and southeast winds occur about 55 percent of the time on an annual basis, according to modeling. Other wind directions could occur at least 25 percent of the time on an annual basis. The Plan fails to provide complete fence-line monitoring coverage to account for these fluctuations. Because of wind direction shifts and other meteorological conditions, the Plan should provide for complete fence-line monitoring coverage or explain in detail why doing so would be infeasible. These dominant wind models, similar to emission factors, are also not necessarily accurate and are not specific to conditions at the refinery. The Plan’s significant coverage gaps undermine the fence-line monitoring purpose to provide accurate real-time “air quality information to the public regarding concentrations of various air pollutants” from refineries.

Response: The predominant wind direction blows from northwest to southeast 40% of the time. Wind blows from southeast to northwest 15% of the time. The proposed plan provides monitoring on the north, east, and south fence lines. This provides sufficient coverage for the residences located predominantly downwind from the refinery and therefore satisfies the requirements of District Rule 4460.

3. **Comment:** The Plan should provide for additional hydrogen sulfide monitoring stations in other areas of the refinery that likely release this pollutant. The Plan provides for hydrogen sulfide (“H₂S”) point monitoring stations on the east side of the refinery (in the north and south corners). The Plan, however, excludes crude oil tanks, rail unload, and rail storage areas that are likely significant sources of H₂S releases. The Plan does not detail the reasons for excluding H₂S monitoring at these sites. The Plan should provide additional H₂S monitoring or explain why doing so would be infeasible or unnecessary.

Response: Potential H₂S emissions from oil tanks, rail unload, and rail storage areas located east of Weedpatch Highway are addressed by the H₂S monitor located downwind on the south east corner of the facility. For the crude oil tank farm located immediately east of Weedpatch Highway, no additional H₂S monitoring is required due to minimal residences located predominantly downwind from the tanks. Therefore, the proposed plan satisfies the requirements of District Rule 4460.

4. **Comment:** The Plan fails to explain the location of the monitoring reflector and analyzer on the south-side of the refinery. The Plan does not provide detailed information concerning the placement of the reflector and analyzer on the south-

side of the refinery near the Reynolds Tract. We are concerned about the accuracy and reliability of the data since these systems are at a substantial distance from the developed area of the refinery. First, this part of the fence-line air monitoring system is at an unknown distance from equipment and storage tanks at the refinery. Second, the Plan does not explain whether and how this distance could impact instrument measurements. Finally, the Plan does not explain the basis for this distance, including whether building the system closer to equipment and storage tanks at the refinery would be infeasible due to obstructions or other technical considerations.

Response: On the south-side of the refinery, there are trees by the tanks that may obstruct the reflector and analyzer. Additionally, placing the path further south will enable the sensor to capture a larger portion of any potential emissions coming from the northwest side of the refinery. Therefore, the proposed plan satisfies the requirements of District Rule 4460.

- 5. Comment:** The east-side monitoring path distance requires detailed information regarding its potential impacts on instrument measurements. The Plan proposes the use of Ultra Violet-Differential Optical Absorption Spectroscopy (UV-DOAS) monitoring equipment. The typical path length for UV-DOAS systems is 500 meters, and “[l]ong path lengths can cause complications when analyzing results.” The east-facing pathway would be 550 meters, but the Plan fails to describe whether and how the proposed path length would affect pollutant measurements.

Response: According to the contractor implementing these devices, UV-DOAS successfully measures chemical species up to about 600 m (one-way path length). This is achieved by increasing the size of the reflectors and providing very stable foundations so that the light beam does not move. Successful measurements for these types of distances have been verified by the manufacturer. Therefore, the proposed plan satisfies the requirements of District Rule 4460.

- 6. Comment:** The Plan should include details that confirm the height of monitoring stations and actual obstructions that could cause interferences. The Plan notes that the “[a]nalyzers and reflectors will be mounted from about 2 m to 15 m above ground level depending on logistical constraints” and that the “height of the measurement along the light beam path will vary depending on refinery equipment or trees that could potentially interfere with the signal.” Although the Plan notes significant uncertainties and the need for further site evaluation, the Plan nonetheless selects the placement of monitoring equipment. Additionally, the Plan neglects to address whether the height of 2 m versus 15 m could cause interference or result in pollution plumes avoiding the monitoring path.

Response: The height is consistent with EPA guidance for open-path monitors (see Table 7-2 in QA Handbook, volume 2 at <https://www.epa.gov/sites/production/files/2020->

10/documents/final_handbook_document_1_17.pdf). The precise heights cannot be determined until after the plan is approved, and the engineering phase of the project has begun. Therefore, the proposed plan satisfies the requirements of District Rule 4460.

7. **Comment:** The Plan omits the specific distances of sensitive receptors from the refineries and fails to include all of the sensitive receptors in the area. The Guidance specifies that all fenceline air monitoring plans must include the distance from the refineries to the closest sensitive receptors. The Plan describes that “there are only a few sensitive receptors within a mile of the facility” and includes a map of the sensitive receptors in the area. The Plan, however, does not explicitly state the distance to the closest sensitive receptors. Instead, the Plan provides a distance ruler that extends about five miles from the refinery. Further, in considering sensitive receptors, the Plan neglects to consider other sensitive receptors within five miles west of the refinery.

Response: The distance ruler allows the reader to determine the approximate distance of all receptors relative to the refinery. The predominant wind direction blows from northwest to southeast. The proposed plan provides monitoring on the north, east, and south fence lines. This provides sufficient coverage for the residences located predominantly downwind from the refinery and therefore satisfies the requirements of District Rule 4460.

8. **Comment:** The Plan fails to provide “detailed information” concerning sources of pollution at the refinery in establishing fenceline coverage. The Plan identifies three general areas of emissions, namely crude oil tanks, hydroprocessing units, and rail unload and storage. The Plan, however, does not provide “detailed information” concerning these areas, including specific equipment and the quantities and types of releases. Instead, after identifying these pollution sources, the Plan proceeds to exclude the crude oil tanks and rail unload and storage areas from any fenceline monitoring coverage without any explanation. The Plan must provide detailed information concerning the sources of pollution at these sites to assess the adequacy of fenceline coverage.

Response: District Rule 4460, Section 6.2, specifically requires detailed information on air monitoring equipment, siting and equipment specifications, procedures for equipment maintenance and failures, procedures for implementing quality assurance, procedures for implementing fence-line air monitoring plan, and methods and timeframe for dissemination of data collected by the air monitoring equipment. The proposed plan meets these requirements in addition to providing sufficient air monitoring coverage for residences located predominantly downwind from the refinery (see response to Comment 1). Therefore, the proposed plan satisfies the requirements of District Rule 4460.

9. **Comment:** The Plan neglects to provide modeling showing the refinery’s air pollutant distribution into surrounding communities. The Guidance specifies that all fenceline air monitoring plans “must include detailed information” regarding

“refinery air pollutant distribution” in impacted communities. This modeling assists in understanding the various sources of pollutant concentrations and their general distribution in the surrounding area. The Plan intends to track sulfur dioxide, hydrogen sulfide, and BTEX compounds (benzene, toluene, ethylbenzene, and xylenes) emissions from the refinery. However, the Plan neglects to provide necessary modeling required to depict the distribution of these air pollutants. Without this information and modeling, it is impossible to assess the adequacy of the monitoring equipment siting.

Response: The District’s *Petroleum Refinery Fence-line Air Monitoring Plan Assistance Documentation* is intended to provide assistance to refineries developing fenceline air monitoring plans. The proposed plan includes nearby sensitive receptors and wind analysis to determine potential air pollution impacts. Based on this information, the proposed air monitoring plan provides sufficient air monitoring coverage for residences located predominantly downwind from the refinery (see response to Comment 1).

10. **Comment:** The Plan fails to address adequately the impacts of calm winds, non-prevailing wind direction, or other meteorological conditions. In determining spatial coverage and equipment site selection, the Plan considers dominant or prevailing wind direction under specific, limited conditions about 10 miles northwest of the refinery. Based on this wind modeling showing northwest and southeast winds occur about percent of the time on an annual basis, the Plan determined monitoring equipment siting and coverage. The Plan, however, fails to adequately consider the range of wind and other atmospheric conditions known to impact the direction of air emissions, including inversions that can cause stagnation. Moreover, the Plan ignores impacts to residences downwind from the “southeasterly wind flow” and “other wind directions” by incorrectly asserting that there are no “nearby receptors” in those directions. As previously noted, there are residences west and northwest of the refinery.

Response: See response to Comment 1.

11. **Comment:** The Plan fails to explain the exclusion of several years of meteorological data and data recorded at stations closer to the refinery. The Plan relies on a 3-year average of meteorological data recorded at the Bakersfield Municipal Airport that is about 10 miles from the refinery. The Plan neglects to explain why it did not use at least the most recent five years of data as recommended by Valley Air for modeling purposes. Additionally, the Plan does not explain the reasons for excluding meteorological data from the agency’s Arvin meteorological station, which is near the refinery.

Response: The District commonly uses 3 to 5 year of meteorological data for modeling purposes. The model takes the raw hourly data and uses it to calculate maximum hourly and average concentrations. The windrose is intended to provide the frequency of the wind direction and wind intensity over a given time period. The predominant wind direction in the Valley may vary between seasons

of the year but does not vary significantly on a year to year basis. Therefore, the 3-year average data is sufficient to capture the general wind patterns and determine the predominant wind direction. The Arvin meteorological station is missing the most recent wind data. The next closest station with the most recent wind data is the Bakersfield Municipal Airport.

12. **Comment:** The Plan should explain potential delays in delivering preliminary data to the public and provide alternative options to notification about exceedances. The Plan notes “data will be delivered to the public via a website within 10 minutes of collection.” The Plan should explain what factors could cause a delay in transmitting the data to the website and public. Additionally, the Plan proposes “email” notifications to the public, agencies, and emergency personnel when concentrations exceed threshold levels. Given technological constraints, barriers, and access issues, the Plan should propose alternative options to notifying interested parties such as text message alerts.

Response: Section 42705.6(d) provides that “to the extent feasible, the data generated by [the fence-line monitoring system] shall be provided to the public as quickly as possible in a publicly accessible format. There are several steps that must occur before data can be published, including raw data processing on site, data transfer to offsite server, post processing data quality control, and publishing of data to the website. As such, 10 minutes is the most feasible time period for providing information to the public as quickly as possible.

13. **Comment:** The Plan does not consider alternative methods of accessing periodic reports for community members without internet access. The Guidance states that fenceline air monitoring plans should “identify alternative methods of accessing periodic reports for those members of the community who may not have internet access (e.g., automated phone systems for dial-in information, public displays, hard copies of periodic reports in libraries or community centers, etc.)” Additionally, the Guidance states that all plans should consider alternative language formats. The Plan does not identify any alternative methods for accessing reports. It also fails to discuss the dissemination of information to community members without internet access or with limited English language understanding. The agency should require that the plan consider these important factors.

Response: The District’s *Petroleum Refinery Fence-line Air Monitoring Plan Assistance Documentation* is intended to provide assistance to refineries developing fenceline air monitoring plans. District Rule 4460 specifically only requires that quarterly reports be submitted to the District, which can be made available to the public upon request.

14. **Comment:** The historical air pollutant data collected by monitoring systems should be preserved and made available to the public for review and download. The Guidance requires fenceline air monitoring plans to consider how “[r]eal-time

current and historical air pollutant and meteorological data” will be made available. The Plan states that “[h]istorical data for the prior quarter will [] be provided.” This limited data preservation should be expanded to include additional quarters or explain why doing so would be infeasible. Moreover, if there are storage limitations, the agency should require that the Plan provide the public with the ability to download data and/or other data retention options.

Response: The District’s *Petroleum Refinery Fence-line Air Monitoring Plan Assistance Documentation* is intended to provide assistance to refineries developing fenceline air monitoring plans. District Rule 4460 requires maintenance of onsite records of all information for at least five years, which must be made readily available to the District upon request. The record retention proposed on Page 5 of the plan satisfies this requirement.

15. **Comment:** The Plan should consider potential mitigation measures to address equipment fog that could undermine the collection of quality data. The Plan concludes that “[p]eriods of poor visibility due to weather-related conditions (e.g., fog) are known to interfere with open-path measurements.” These fog events are likely to occur “during the nighttime and early morning hours.” However, the Plan does not detail when Tule fog events are likely to occur in the year. Moreover, the Plan does not consider mitigation measures, such as heaters and fans or anti-fog instruments, to reduce moisture buildup on the reflectors as the fog dissipates. Without these measures, the high levels of humidity could fog up these instruments and interfere with data collection.

Response: As mentioned in section 4.1 of the plan, heaters at the retroreflectors will be used to address moisture buildup that could interfere with data collection.

16. **Comment:** The proposed manufacturer recommended equipment maintenance ignores particulate pollution in the area that require tailored inspection timelines. The Plan proposes “[m]onthly maintenance [that] includes inspecting the sensor for dirt, spiderwebs, birds’ nests, or other obstructions and cleaning if necessary.” These “typical” maintenance activities are from an undisclosed manufacturer whose equipment the refinery might not even use. Moreover, the areas at and near the refinery experience year-round fugitive dust events and high fine particulate pollution. The Plan does not explain how these monthly inspections would be sufficient given these environmental conditions. Valley Air should require more frequent inspections and cleaning of monitoring instruments.

Response: As mentioned in Section 5 of the plan, inspections will be performed on a monthly basis in addition to on an as-needed basis through system status alarms that will alert operators to specific issues needing to be addressed.

17. **Comment:** The Plan lacks standard operating procedures for the maintenance and audits of fenceline air monitoring equipment. The Plan notes that “Standard Operating Procedures for maintenance and audits” of monitoring equipment

would be determined “once final instrument determinations are made.” Kern Oil & Refining has not selected specific manufacturers. Valley Air should circulate these standard operating procedures prior to final approval of the Plan.

Response: The development and implementation of a fence-line air monitoring system is complex and resource intensive. Therefore, the plan must be approved prior to implementation. During the implementation phase, the equipment can be determined, and thereafter the standard operating procedures can be developed. The District will make available the standard operating procedures to the public upon request.

18. **Comment:** The Plan should detail the spare parts it will retain onsite to facilitate immediate repairs and avoid significant monitoring equipment downtime. The Plan states that the refinery “will keep some spare parts available for emergency repairs.” The Plan does not provide detailed information regarding what equipment spare parts it will acquire in advance and how these will be stored on site. This information is significant to ensure minimal monitoring equipment downtime.

Response: The development and implementation of a fence-line air monitoring system is complex and resource intensive. The details of specific spare parts required cannot be determined until final instrument selection and engineering after plan approval. Kern Oil and Refining Co will work with the District to provide appropriate backup parts.

19. **Comment:** The Plan lacks sufficient details regarding backup monitoring and provides for excessive downtime before deploying backup measures. The Guidance states fence-line air monitoring plans must include the “[t]emporary air monitoring measures that will be implemented in the event of an equipment failure or during routine maintenance activities and used until the fence-line air monitoring system is restored to normal operating conditions.” The Plan includes the temporary monitoring measure of using integrated 24-hour canisters of VOCs taken once per day. This temporary monitoring measure only will be used if the monitoring system is down for more than 96 hours. The proposed downtime is excessive despite the Plan’s assertion that “extended downtimes are not anticipated.” The refinery should deploy backup measures after 24 hours of downtime or explain why doing so would be infeasible. Moreover, the Plan does not address the feasibility of backup portable equipment to provide real-time data, and it omits details regarding the number of VOC canisters to be deployed and the backup measures for other pollutants. Without these details, it is impossible to assess the adequacy of backup measures.

Response: Down time for routine maintenance are expected to be less than 4 hours per month. Longer down time would be due to breakdowns, which are subject to strict District Rule 1100 requirements. This includes notification to the District no later than one hour after detection and taking immediate appropriate corrective measures. The 96 hours will provide the necessary time for the facility

to diagnose, address the breakdown, and bring the monitor back online or implement the backup monitoring if necessary.