County of Los Angeles / Department of Public Health Environmental Health Division

PRELIMINARY ENVIRONMENTAL HEALTH ASSESSMENT Allenco Energy Facility and University Park Community

12-03-13

Note: On October 18, 2013, the Los Angeles County Department of Public Health (DPH) was asked by the South Coast Air Quality Management District (AQMD) to assess whether conditions at the subject facility could be adversely affecting the health of nearby residents. Based on review of available environmental and health data, DPH has prepared this Preliminary Environmental Health Assessment.

Background: Allenco currently operates seven of 21 existing oil production wells at a facility within the University Park Community of Los Angeles. Mixed residential and commercial land use adjoins the facility. Facility operations are primarily regulated by the State Division of Oil, Gas and Geothermal Resources (DOGGR) within the California Department of Conservation; the South Coast Air Quality Management District (AQMD); and the County Fire Department. In recent years, AQMD has received odor complaints from members of the adjoining community, who have also reported long-standing complaints of headaches, nausea, and symptoms associated with irritation to the eyes, nose, throat, and airways. The regulatory agencies, including U.S. EPA – Region 9, are jointly considering options to better address site emissions affecting the surrounding community.

Problem Identification: Odor and health complaints from residents in the community adjoining the Allenco facility have persisted for several years. The facility has had periodic violations of applicable regulations. Its proximity to residential housing, however, has also resulted in periodic exposure of residents to petroleum hydrocarbons and associated odors when the facility is in compliance with existing regulations. These compounds may cause adverse health effects even at levels which comply with regulatory standards.

Potential Other Sources of Exposure: A heavily trafficked commercial zone is situated east of the facility along Figueroa Street. The 110 and 10 freeways are situated northeast and north of the facility, respectively.

Potentially Affected Population: Several hundred individuals reside within 750 ft of the subject facility. Mount St. Mary's College lies next to the Allenco Facility, with college offices and a dormitory adjacent to the property line. The Esperanza Housing Authority operates several multiple dwelling units in close proximity to the facility.

Assessment: The Allenco facility appears to have operated in general compliance with permit conditions, but odor and health complaints from the public have persisted. The facility is situated in close proximity to the adjoining community; a situation in which even a compliant operation can produce low-level emissions capable of affecting public health and well-being.

The petroleum-based compounds emitted at the facility appear to be well below levels that would lead to long-term systemic health effects. However, continual intermittent exposure to low level emissions can cause recurrent, non-systemic health effects with symptoms consistent with those reported in the University Park community. In this community the symptoms are recurrent and seem to arise with odor complaints.

Petroleum-based compounds and associated odors from the Allenco facility are affecting the health and well-being of the adjoining community. This condition is unlikely to resolve without facility process modifications or operational curtailment.

Recommendations

- (1) County DPH should further investigate and characterize community members' health concerns, and monitor the resolution of these concerns concurrent with implementation of the following interventions.
- (2) The regulatory agencies should support and expand upon AQMD's current odor mitigation efforts by requiring the conduct of a facility-wide audit to identify sources of equipment and process-related emissions within the facility. This audit would also identify opportunities to further mitigate emissions using standard or advanced industry practices employed at other oil production facilities situated in urban areas.
- (3) The regulatory agencies should continue to explore appropriate interventions with the goal of eliminating odor emissions from the Allenco facility into the community. It is also recommended that a post-mitigation plan be established to monitor the success of these interventions.
- (4) It is recommended that the agencies consider the development and adoption of alternative standards for similar facilities which are situated in close proximity to residential communities.

Cyms Raps wo FAAR Acut

Dr. Cyrus Rangan, M.D., F.A.A.P., F.A.C.M.T.

Director, Bureau of Toxicology and Environmental Assessment

Angelo J. Bellomo, REHS

Director of Environmental Health