Santa Barbara County
Air Pollution Control District

Santa Barbara County Air Pollution Control District
Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities
Frequently Asked Questions – Version 1.2

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General

The Regulation: On October 1, 2017, the GHG Oil and Gas Regulation (§95665-§95677 of the California Code of Regulations) became effective. This regulation is one of the State's Climate Change initiatives aimed at reducing greenhouse gas emissions. This regulation focuses on reducing methane gas emissions from oil and gas operations. Background information, including CARB's staff reports and PowerPoint presentations, may be found on their webpage at: https://www.arb.ca.gov/cc/oil-gas/oil-gas.htm. The Final Regulation Order may be downloaded here: https://www.arb.ca.gov/regact/2016/oilandgas2016/ogfro.pdf

The regulation is organized into the following sections:

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What is the Memorandum of Agreement? Our agency will enter into a Memorandum of Agreement with the California Air Resources Board to implement and enforce the requirements of this new State requirement. This MOA delegates authority to the District to implement and enforce a majority of the regulation. Areas not delegated include:

(i) Review of the Monitoring Plans required for Natural Gas Underground Storage Facility (ref: §95668(h))

(ii) Requirements related to well stimulation treatments (ref: §95668(b)),

(iii) Requirements related to critical components for facilities and components regulated solely as a result of the regulation (ref: §95670), and

(iv) Requirements and authorities specified in §95674 and §95676 of the regulation.

A copy of the MOA will be posted on the District's Oil and Gas webpage at http://www.ourair.org/oil-and-gas/.

Who is impacted by this regulation? This regulation applies to a wide range of oil and gas operations. The regulation does not apply to platforms on the Outer Continental Shelf. Section 95666 (Applicability) defines the sectors impacted:

(1) Onshore and offshore crude oil or natural gas production
(2) Crude oil, condensate, and produced water separation and storage
(3) Natural gas underground storage
(4) Natural gas gathering and boosting stations
(5) Natural gas processing plants
(6) Natural gas transmission compressor stations.

How are existing facilities handled? The regulation is written with existing local rules and regulations in mind. Special provisions are added for facilities that are already permitted and that are implementing emission controls pursuant to local oil and gas rules. The following points provide clarity:

- Leak Detection and Repair (LDAR): Section 95669 of the regulation (page 24) contains the requirements for a complete LDAR program. Section (b)(1) provides an exemption for "*Components, -- including components found on tanks, separators, wells, and pressure vessels -- that are subject to local air district leak detection and repair requirements if the requirements were in place prior to January 1, 2018*". This exempts "components" at facilities already subject to the District's LDAR Rule 331 (*Fugitive Emissions Inspection and Maintenance*). The exemption applies to components at existing facilities as well as future facilities and their components. An important caveat is that components that are not subject to Rule 331 monitoring, either by applicability or by a specific exemption in the Rule, would then be subject to the new CARB regulation (note that the CARB regulations also contains similar exemptions for some component categories). Updates to existing I&M Plans to retract prior component exemption requests will make these components subject to Rule 331

(and not the CARB requirements). I&M Plan revisions are due by January 1, 2018.

- Separator and Tanks Systems: Section 95668(a) of the regulation (page 9) applies to Separator and Tank Systems as defined in the CARB regulation. Section (a)(2)(C) provides an exemption for existing Separator and Tank systems "*…that are controlled as of January 1, 2018 with the use of a vapor collection system approved for use by a local air district*." Any facility with a Separator and Tank system that was permitted and had vapor collection system as of January 1, 2018 would be exempt from this regulation. District Rule 325 (*Crude Oil Production and Separation*) already requires these devices to utilize vapor collection systems. However, any new separator or tank (including replacements) installed after January 1, 2018 is subject to the regulation. Use of a vapor collection system on the new separator and/or tank would achieve compliance with regulation. If the new separator or tank is exempt from vapor recovery under District Rules, it must then comply with the regulation (which also has its own set of exemptions).

The remaining requirements of the regulation (e.g., compressors, natural gas pneumatics, well casing vents) apply to existing facilities.

Are there any permitting requirements for existing facilities? Oil and gas permits already list the affected equipment, so no immediate permitting action is required. At time of permit renewal (or significant operating permit issuance), the District will add permit terms that ensure compliance with the regulation. Permits will only be required if a facility needs to make physical modifications or implements a new emissions control strategy in order to comply with the CARB regulation.

Will the District implement a Registration program? No. Existing oil and gas permit "equipment lists" already include the equipment affected by the CARB Regulation.

What are the fees going to be? No new fees are being proposed by the District. Facilities that need permits will be assessed fees using the existing provisions of Rule 210. District costs associated with implementing and enforcing the regulation for natural gas underground storage facilities, and potentially some facilities subject to the CARB regulation LDAR requirements, will be assessed on a cost reimbursement basis per Rule 210.

Are there new or special definitions? Yes, there are new definitions that are specific to the regulation. Section 95667 (page 2) contains the entire list of definitions. The District would like to point out the following:

- *"Circulation tank" means a tank or portable tank used to circulate, store, or hold liquids or solids from a crude oil or natural gas well during or following a well stimulation treatment but prior to the well being put into production*.

- *"Critical component" means any component that would require the shutdown of a critical process unit if that component was shutdown or disabled*.

- *"Critical process unit" means a process unit or group of components that must remain in service because of its importance to the overall process that requires it to continue to operate, and has no equivalent equipment to replace it or cannot be bypassed, and it is technically infeasible to repair leaks from that process unit without shutting it down and opening the process unit to the*

atmosphere".

- *"Flash or flashing" means a process during which gas dissolved in crude oil, condensate, and produced water by using sampling and laboratory procedures used for measuring the volume and composition of gases released from the liquids, including the molecular weight, the weight percent of individual compounds, and a gas-oil or gas-water ratio."*

- *"Liquids unloading" means an activity conducted with the use of pressurized natural gas to remove liquids that accumulate at the bottom of a natural gas well and obstruct gas flow."*

- *"Non-associated gas" means natural gas that is not produced as a byproduct of crude oil production but may or may not be produced with condensate."*

- *"Pneumatic device" means an automation device that uses natural gas, compressed air, or electricity to control a process."*

- *"Pneumatic pump" means a device that uses natural gas or compressed air to power a piston or diaphragm in order to circulate or pump liquids.*

- *"Separator and tank system" means the first separator in a crude oil or natural gas production system and any tank or sump connected directly to the first separator."*

- *"Separator" means any tank or pressure separator used for the primary purpose of separating crude oil, produced water, and natural gas or for separating natural gas, condensate, and produced water. In crude oil production a separator may be referred to as a Wash Tank or as a three-phase separator. In natural gas production a separator may be referred to as a heater/separator."*

- *"Tank" means any container constructed primarily of non-earthen materials used for the purpose of storing, holding, or separating emulsion, crude oil, condensate, or produced water and that is designed to operate below 15 psig normal operating pressure."*

- *"Well casing vent" means an opening on a well head that blocks or allows natural gas to flow to the atmosphere or to a vapor collection system."*

- *"Well stimulation treatment" means the treatment of a well designed to enhance crude oil and natural gas production or recovery by increasing the permeability of the formation and as further defined by the Division of Oil, Gas, and Geothermal Resources SB 4 Well Stimulation Treatment Regulations, Title 14, Division 2, Chapter 4, Subchapter 2, Article 2, section 1761(a) (June 16, 2017), which is incorporated herein by reference."*

Does the regulation apply to utility owned Odorant & Metering stations? No, these facilities are outside the scope of this regulation. CARB is evaluating a separate regulation for utility distribution systems, including odorant & metering stations.

Which agency is implementing and enforcing this new regulation? The District will be entering into a Memorandum of Agreement with CARB to implement and enforce the State regulation. With a

few exceptions, the District will be the primary agency involved. CARB will retain its role to implement and enforce the State regulation at their discretion.

What should my company be doing right now to prepare for this new regulation? Existing processes should be assessed for regulation applicability. Are all Separator and Tank Systems (including upstream gauge tanks) connected to a Vapor Collection System? Are there any Reciprocating and/or Centrifugal Natural Gas Compressors? Does the facility have Natural Gas Powered Pneumatic Devices or Pumps? Is the facility utilizing any of the Rule 331 Section B exemptions? Updates to existing I&M Plans to retract prior component exemption requests will make these components subject to Rule 331 (and not the CARB requirements). I&M Plan revisions are due by January 1, 2018. Also, complete a *GHG Compliance Status Checklist* form for each facility (see https://www.ourair.org/oil-and-gas/). Operators are encouraged to contact Engineering Division staff if there are any questions.

Does this regulation apply to crude oil pump stations? Yes.

Separator and Tank Systems

What is the deadline for comply with §95668(a) requirements for Separator and Tank Systems? First, if you are an existing facility that has a District permitted vapor collection system on your separator and tank system, then you are exempt from the regulation. Existing facilities that do not have a vapor collection system on the separator and tank system must either install a vapor collection system or conduct flash analysis testing of the crude oil, condensate, or produced water processed, stored, or held in the system by JANUARY 1, 2018. New separator and tank systems not controlled by a vapor collection system must conduct flash analysis testing within 90 DAYS of initial startup.

When are emission controls required for uncontrolled Separator and Tank Systems? If the results of flash tests show than annual emissions are greater than 10 metric tons per year of methane, then emission controls are required. For existing separator and tank systems (and associated upstream gauge tanks), the vapor collection system must be in place by JANUNARY 1, 2019. For new separator and tank systems (and associated upstream gauge tanks), the vapor collection system must be in place by within 180 DAYS of conducting the flash analysis testing.

How are gauge tanks affected? Gauge tanks located upstream of a separator and tank system are subject to the requirements of the regulation and must meet the same standards and timelines as the separators and tanks.

Do I need additional flash analysis testing if the emissions are less than 10 mt/yr Methane? Yes, annual flash analysis testing must be conducted beginning JANUARY 1, 2019. After three years of positive test results, the test frequency may be reduced to once every five years. This only applies if your separator or tank is not connected a vapor collection system.

Circulation Tanks

What information should be submitted to the District regarding Circulation Tanks for Well Stimulation Treatments? None (at this time). The facility must provide all submittals and work directly with the California Air Resources Board regarding the technology assessment and emissions

testing. If CARB requires use of a VCS on circulation tanks, ATC permit applications would be required in advance of the January 1, 2020 deadline (or beyond if extended by CARB).

Natural Gas Compressors

Is there a de minimis threshold for the Reciprocating or Centrifugal Natural Gas Compressor requirements? Yes, reciprocating and centrifugal natural gas compressors that operate less than 200 hours per calendar year are exempt from the requirements of the regulation. Recordkeeping is required to qualify for this exemption.

What are the basic requirements for Reciprocating Natural Gas Compressors? The regulation bi-furcates the requirements into two groups. Section (c)(3) applies to onshore or offshore crude oil or natural gas production facilities and Section (c)(4) applies to natural gas gathering and boosting stations, natural gas processing plants, natural gas transmission compressor stations, and natural gas underground storage facilities.

For crude oil or natural gas production facilities:

- LDAR is required on all system components effective JANUARY 1, 2018 following procedures outlined §95669.
- Beginning JANUARY 1, 2019, compressor vent stacks used to vent rod packing or seal emissions shall be controlled with the use of a vapor collection system as specified in §95671. In lieu of the vent stack requirement, the operator may comply by implementing the LDAR noted in Sections (A) and (B) and any rod packing or seal leak concentration measured above the minimum leak threshold specified in §95669 shall be successfully repaired within 30 calendar days from the date of initial measurement.

For natural gas gathering and boosting stations, natural gas processing plants, natural gas transmission compressor stations, and natural gas underground storage facilities:

- LDAR is required on all system components effective JANUARY 1, 2018 following procedures outlined §95669. This does not include the rod packing component.
- The compressor rod packing or seal emission flow rate through the rod packing or seal vent stack shall be measured annually by direct measurement (if not connected to a VCS).
- Effective JANUARY 1, 2019, compressor vent stacks used to vent rod packing or seal emissions shall be controlled with the use of a vapor collection system as specified in §95671. In lieu of the vent stack requirement, the operator may comply by successfully repairing (within 30 calendar days) any measured emission flow rate greater than two (2) standard cubic feet per minute (scfm), or a combined rod packing or seal emission flow rate greater than the number of compression cylinders multiplied by two (2) scfm. This alternative is effective JANUARY 1, 2019.

What are the basic requirements for Centrifugal Natural Gas Compressors? LDAR requirements are effective JANUARY 1, 2018. The operator has two options to comply with the regulation:

- Beginning JANUARY 1, 2019, centrifugal compressors with wet seals shall control the wet seal vent gas with the use of a vapor collection system as described in §95671.
- In lieu of the vapor collection system requirement above, the operator may comply by successfully repairing (within 30 calendar days) any measured emission flow rate greater than three (3) scfm or a combined flow rate greater than the number of wet seals multiplied by three (3) scfm. This alternative is effective JANUARY 1, 2019.

Natural Gas Powered Pneumatic Devices and Pumps

Is a pneumatic pump considered a pneumatic device? For this regulation, these two terms are defined as distinctly separate devices. So, no, a pneumatic pumps is not a pneumatic device.

What are the basic requirements for Natural Gas Powered Pneumatic Devices and Pumps? The category breaks the devices into "continuous" and "intermittent" bleed categories and "devices" and "pumps". The basic requirements include:

- Intermittent bleed natural gas pneumatic devices must implement LDAR effective JANUARY 1, 2018.
- Pneumatic pumps shall not vent natural gas to the atmosphere and must implement LDAR effective JANUARY 1, 2019.
- Effective JANUARY 1, 2019 continuous bleed natural gas pneumatic devices shall not vent natural gas to the atmosphere and must implement LDAR. {*see below for continuous bleed natural gas pneumatic devices installed prior to January 1, 2016*.}
- Effective JANUARY 1, 2019 continuous bleed natural gas pneumatic devices installed prior to January 1, 2016 may not vent more than 6 scfh when the device is idle and not actuating and must implement LDAR.

Liquids Unloading of Natural Gas Wells

What are the basic requirements for Liquids Unloading of Natural Gas Wells? Effective JANUARY 1, 2018, the regulation requires the vented natural gas to be collected by a vapor collection system or the volume of vented natural gas to be measured and recorded as specified in the regulation.

Well Casing Vents

How do the Well Casing Vent requirements apply? The regulation requires facilities that vent natural gas from open well casing vents to measure the flow rate annually. Most oil and gas facilities are subject to Rule 325 (*Crude Oil Production and Separation*). That rule prohibits the venting of produced gas from open well casing vents.

Natural Gas Underground Storage Facilities

How will the District implement and enforce Section 95668(h) for Natural Gas Underground Storage Facility Monitoring Requirements? The District is not delegated authority to approve the monitoring plans required by section 95668(h). CARB staff will perform that review process with technical input from the District. Facilities are required to submit a monitoring plan by JANUARY 1, 2018

and implement it within 180 days of CARB approval. The District will implement and enforce the approved plan and the other requirements of the regulation (e.g., LDAR, compressors, separators and tanks systems, etc.).

Leak Detection and Repair (LDAR)

Will the LDAR requirements in §95669 apply if the District has an existing LDAR rule? No, the regulations' LDAR requirements in §95669 will not apply if the components (including components found on tanks, separators, wells, and pressure vessels) are subject to local air district leak detection and repair requirements if the requirements were in place prior to January 1, 2018. This applies to existing components, future modifications that add new components and components at entirely new facilities. If the facility has components that are not subject to District Rule 331 (*Fugitive Emissions Inspection and Maintenance*) or if the operator has claimed an exemption specifically allowed by Rule 331, then these components are subject to the LDAR requirements of the State regulation. Note that components exempt under Rule 331 may also be exempt under the State's regulation. We encourage existing facilities to update their existing I&M Plans to retract prior component exemption requests under Section B of Rule 331 (in whole or in part) as this will make these components subject to Rule 331 (and not the CARB requirements). Revision to the I&M Plan would be due by January 1, 2018. District staff can assist in this process.

When other Sections of the Regulation point to §95669 for LDAR and the District has a LDAR Rule in place as of January 1, 2018, will the District's requirements apply? Yes, the local LDAR rule would apply to these components as long as the components are required by the rule to be actively monitored. If the operator has claimed exemptions from the local LDAR rule that exempts specific components from monitoring, then the CARB regulation would apply to those components. The references occur in the Natural Gas Compressor sections and the Natural Gas Powered Pneumatic Devices and Pumps section.

Do facilities that are exempt from Rule 331 have to submit an Inspection & Maintenance Plan? A District I&M Plan is a Rule 331 requirement. As such, facilities implementing the LDAR requirements of the CARB regulation directly do not have to provide the District an I&M Plan. LDAR recordkeeping and reporting forms are contained in Tables A4 and A5 in the Appendix of the regulation. Operators may wish to develop and propose alternative recordkeeping and reporting forms. As noted previously, we encourage existing facilities to update their existing I&M Plans to retract prior component exemption requests under Section B of Rule 331 (in whole or in part) as this will make these components subject to Rule 331 and not the CARB regulation.

Will my facility be subject to the CARB regulation if I have components using the Rule 331.B.3.b exemption (ROC less than 10%)? Yes. This exemption from LDAR applies to components (exclusive of gas plants) exclusively handling liquid and gaseous process fluids with an ROC concentration of 10 percent or less by weight from certain provisions of Rule 331. Be sure to check if there is an exemption in the CARB regulation for that component. For example, Section B.3.b provides a mechanism to exempt produced water tanks from the provisions of Sections F.1, F.2, F.3 and F.7. And §95669(b)(3) exempts components incorporated into produced water lines located downstream of a separator and tank system that is controlled with the use of a vapor collection system. Another option

would be to modify your District I&M Plan to retract the exemption request (but still retain the produced water exemption of Rule 331). These components would no longer be exempt from Rule 331 and the CARB regulation would not apply.

Rule 331.B.2.a exempts natural gas from LDAR requirements. Will my facility be subject to the CARB regulation if I have components meeting this exemption? Yes. But to qualify for this exemption, the composition of the natural gas must be greater than 80% methane and less than 1% ROC (both on a weight basis). Our review of multiple SoCal Gas analyses shows their natural gas exceeding the 1% weight percent threshold. Note that §95669(b)(4) provides a limited exemption for natural gas distribution pipelines located at a crude oil production facility used for the delivery of commercial quality natural gas and which are not owned or operated by the crude oil production facility. Another option would be to modify your District I&M Plan to retract the exemption request (but still retain the Rule 331 exemption for the utility lines). These components would no longer be exempt from Rule 331 and the CARB regulation would not apply.

Does the CARB regulation apply to components using the Rule 331.B.3.a heavy liquid service exemption? Yes. Per CARB, both exemptions must be met. The CARB regulation exempts components used exclusively for crude oil with an API Gravity less than 20 (averaged on an annual basis). Rule 331 uses a different definition for heavy liquids. We believe, however, that facilities using the Rule 331 exemption will also meet the CARB definition.

Does the CARB regulation apply to pneumatic valves exempted under Rule 331.B.3.e? Yes. Readings are to be taken when the valve is idle. LDAR requirements under the CARB regulation commence on January 1, 2018. Another option would be to modify your District I&M Plan to retract the exemption request. These components would no longer be exempt from Rule 331 and the CARB regulation would not apply.

Critical Components

Who reviews and makes Critical Component determinations? Critical component determinations are made by the District if the components were previously subject to a District LDAR program. In the case of newly added components, the District makes this determination if the "component" type was previously covered by the local LDAR rule. For components not subject to District Rule 331, CARB must review and make the determination (unless otherwise noted in the MOA).

What is the deadline for obtaining CARB approval of Critical Components? The deadline for obtaining CARB approval is JANUARY 1, 2018. For new components, the deadline is 180 days from installation. All requests for critical component status must be pre-approved by CARB if owners or operators wish to claim the critical component exemption (which is not the same process used by the District). Again, CARB approval is only required when the component in question is subject solely to the State regulation, so the impact is very limited.

Vapor Collection Systems and Vapor Control Devices

Under what circumstances must an operator install a low NOx flare? There are two cases where a low NOx flare is required under the regulation. See §95671(c). The first case is where the operator

needs to install a flare in order to comply with the regulation's VCS requirements. The second case is for existing facilities already with a flare where they are required to control additional vapors in order to comply with the regulation. Examples for the second case include:

(1) An existing separator/tank system is in a nonattainment area where there is an existing flare as part of the VCS and the separator is controlled, but the oil tank and wastewater tank are uncontrolled. The regulation requires VCS for the oil tank and wastewater tank and the only option is to combust the additional vapors in a flare. The additional vapors trigger the requirement for the existing flare to be replaced with a low NOx unit per §95671(d)(B).

(2) A bank of reciprocating compressors operating at a natural gas underground storage facility are subject to §95668(c)(4). In this scenario, the operator cannot comply with the rod packing emission flow rates specified in §95668(c)(4)(D) and must therefore comply with the §95668(c)(4)(C) requirement to control the compressor vent stacks with a VCS. The operator has an existing flare on site and determined that combusting the additional vapors is their only option. The regulation requires the existing flare be replaced with a low NOx unit per §95671(d)(B).

Recordkeeping and Reporting

What are the Recordkeeping and Reporting requirements if my Separator and Tank System is already controlled by a permitted District Vapor Control System? Separator and tank systems that are controlled by a VCS permitted by the District are required to follow the regulation's recordkeeping and reporting requirements under §95672(a)(1-3) and §96673(a)(1). The District will work on streamlining the reporting requirements by merging the reports into the existing permit so that all reporting is submitted together by the typical March 1 deadline. Note, however that the CARB regulation requires reports in both January and July of each year. Submit all CARB required reports to the District. Continue to follow the recordkeeping and reporting requirements of the District-issued permit and the applicable District rules.

What records must be kept and reported for Reciprocating and Centrifugal Compressors? This is dependent on which option is used to demonstrate compliance with the regulation. For example, for reciprocating compressors located at an onshore oil production facility, if the LDAR option is selected and if the compressor seal/packing rod are subject to the District LDAR program, then no additional recordkeeping or reporting are required beyond what is required by the local LDAR rule. The same answer applies if vent stacks used to vent the seal/rod packing are controlled by a VCS.

However, if the same compressor were located at a natural gas processing plant or a natural gas underground storage facility, LDAR records/reporting under the CARB regulation would be required for the underground storage facility (Rule 331 does not apply to these facilities) but not for the gas processing plant (Rule 331 typically applies to these facilities). All records of flow rate tests, dates/hours of operation and proof of parts procurement must be kept and reports must be provided for all flow tests. As can be seen, the specific recordkeeping and reporting requirements are dependent on a number of factors. Ask District staff if you have questions.

What records must be kept and reported for Circulation Tanks used for Well Stimulation Treatments? The regulation requires the owner/operator to maintain a copy of the best practices management plan as specified in section 95668(b)(1).

What records must be kept and reported for Pneumatic Devices and Pumps? If required, records of each emissions flow rate measurement must be kept and reported.

What records must be kept and reported for Natural Gas Underground Storage Facilities? These facilities are required to follow all the specific recordkeeping and reporting requirements listed in §95672(a)(15-16) and §96673(a)(8-11) for the implementation of the CARB approved Monitoring Plan as well as records and reporting for any device subject to the other parts of the regulation (e.g., LDAR, compressors, pneumatics). Owners/Operators of these facilities are encouraged to work with District staff to develop streamlined recordkeeping forms and reports.

What are the Recordkeeping and Reporting requirements if the components at my facility are covered by an existing District LDAR program? Components that are covered by a District LDAR system (in effect January 1, 2018) are not required to follow the regulation's recordkeeping and reporting requirements under §95672(a)(17-20) and §96673(a)(12-13). Any components that are not covered or are exempted by the District LDAR program are required to comply with CARB's regulation for LDAR and must maintain records and provide reports for those components as specified in the regulation under §95672(a)(17-20) and §96673(a)(12-13).

What records must be kept and reported for Leak Detection and Repair for Components not subject to a local LDAR rule? For components solely subject to the CARB regulation, the recordkeeping and reporting requirements in §95672(a)(17-20) and §96673(a)(12-13) apply. LDAR recordkeeping and reporting forms are contained in Tables A4 and A5 in the Appendix of the regulation. Operators may wish to develop and propose alternative recordkeeping and reporting forms.

Who do I submit the required reports to? In general, submit all reports required by the regulation (per §95673) to the District. The only exception is for Natural Gas Underground Storage facilities. Specifically, the 24-hours notifications under §96673(a)(8-9) must be reported to CARB, the Department of Oil, Gas, and Geothermal Resources, and the District. Refer to the *CARB GHG Oil & Gas Regulation* section on the District's Oil & Gas webpage for additional directions (https://www.ourair.org/oil-and-gas/).

When are the reports due? Reports required by the CARB regulation are due to the District by January 1 and July 1. This will change over time as we incorporate the terms of the CARB regulation into the District's permits. Our goal is to simply the requirements for our permit holders. To that end, we intend on synchronizing the CARB reporting date with reporting date in the permit (typically March 1).