

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION	APPL. NO. 478120	DATE 6/28/13	PAGE 1 of 3
	APPLICATION PROCESSING AND CALCULATIONS	PROCESSED BY J. West	CHECKED BY

**RULE 1176: VOC EMISSIONS FROM WASTEWATER SYSTEMS
COMPLIANCE PLAN**

SUMMARY: Evaluation of Rule 1176 VOC Emissions from Wastewater Systems Compliance Plan. The Rule 1176 Compliance Plan was submitted, as required by Rule 1176(d)(2) to provide a statement regarding which compliance option was chosen, a detailed schematic drawing of the location of the wastewater system within the facility identifying all associated APC devices, a complete DSC list identifying the total number, individual location and type of DSC control (if controlled), historical monitoring data, proposed control methods for each junction box (as necessary), and any alternate DSC controls.

COMPANY INFORMATION

Company Name: Ultramar Inc., Facility ID No. 800026
Mailing Address: 2402 East Anaheim St., Wilmington, CA 90744
Equipment Location: 2402 East Anaheim St., Wilmington, CA 90744
Contact Person: Jon Elliott (562) 491-6797

COMPLIANCE RECORD REVIEW

A query of the AQMD Compliance Database for the past two years (6/1/11 to 6/28/13) identified 14 Notice of Violations (NOVs) and two Notices to Comply (NC) that were issued to the Ultramar Inc Refinery (Facility ID 800026). Two of the NOVs were related to leaks at wastewater system drain components. The compliance database indicates that the facility is currently in compliance with applicable rules and regulations.

FEE EVALUATION

The BCAT for Rule 1176 plans is 666126 [Compliance Plan for Rule 1176(d)(e) VOC Em Waste Water Sys], Schedule C. Fees of \$485.45 were paid when the application was submitted. No additional fees are due.

PLAN EVALUATION

The purpose of Rule 1176 is to reduce emissions of volatile organic compounds (VOC) from wastewater systems. Wastewater systems and closed vent systems subject to the requirements of this rule are required to prevent emissions greater than 500 ppm VOC above background levels. Sumps and wastewater separators are required to be equipped with either a floating cover, a fixed cover vented to an APC device, or an equivalent alternate control measure. Sewer lines are required to be completely enclosed, and all manhole covers completely sealed. New process drains installed after 9/13/96 are required to be equipped with water seal or equivalent controls. Junction boxes are required to be totally enclosed with a solid, gasketed fixed cover or a manhole cover. APC devices shall either have a control efficiency of 95% or not emit VOC emissions greater than 500 ppm above background. Refineries are also required to either control all DSCs or control repeat-emitting DSCs within 60 days of becoming a repeat-emitting DSC.

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION	APPL. NO. 478120	DATE 6/28/13	PAGE 2 of 3
	APPLICATION PROCESSING AND CALCULATIONS	PROCESSED BY J. West	CHECKED BY

This plan was submitted to comply with the requirement for a Compliance Plan [1176(d)(2)]. The information required to be included in the Rule 1176 Compliance Plan [1176(d)(2)(A)-(F)] is:

- A. A statement regarding which compliance option was chosen: (e)(7)(A) or (e)(7)(B)
- B. A detailed schematic drawing of the location of the wastewater system within the facility identifying all associated APC devices
- C. A complete DSC list identifying
 - a. the total number of DSCs
 - b. individual location of each DSC
 - c. type of DSC control (if controlled)
 - d. identification of each DSC as either non-emitting; low-emitting; high-emitting or; repeat-emitting
- D. Historical monitoring data
- E. Identification of the proposed control methods for each junction box (as necessary)
- F. Complete descriptions of any alternate DSC controls

The facility submitted AN 334508 on 10/17/97, but it was cancelled when it was superseded by the subject application in 2008. The facility submitted this updated Rule 1176 plan (A/N 478120) dated 2/7/08 due to changes from the ReVAP and Rule 1105.1 projects at the refinery. Additional information was provided 5/15/13 and 6/20/13 to meet Rule 1176 plan requirements.

EVALUATION OF RULE 1176 PLAN SUBMITTAL

The Rule 1176 plan submitted by the facility was compared against the plan requirements. A summary of the plan checklist is provided below in **Table 1**. For each applicable plan requirement, compliance with the plan requirement is assessed via a checkmark in the “yes” or “no” column, and remarks are provided with details from the facility’s plan.

Table 1. Checklist for Rule 1176 Inspection & Maintenance Plan

Rule 1176 Plan Requirement [1176(d)(2)]	Compliance?		Remarks
	Yes	No	
A statement regarding which compliance option was chosen: (e)(7)(A) or (e)(7)(B)	√		The facility chose to comply with (e)(7)(A)
A detailed schematic drawing of the location of the wastewater system within the facility identifying all associated APC devices	√		The facility submitted drawings for 22 areas of the refinery as Appendix A: “1176 Affected Drawings”
A complete DSC list identifying: <ul style="list-style-type: none"> • the total number of DSCs • individual location of each DSC • type of DSC control (if controlled) • identification of each DSC as either non-emitting; low-emitting; high-emitting or; repeat-emitting* 	√		On 5/15/13, the facility submitted an updated list of 1959 DSCs, each with a location description and drawing #, with the control type and DSC categorization (“*-emitting”) provided. 1937 low-emitting, 15 high-emitting, 7 repeat-emitting
Historical monitoring data	√		The facility provided monitoring data from 4/1/11 to 3/28/13 (49,185 entries)

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION	APPL. NO. 478120	DATE 6/28/13	PAGE 3 of 3
	APPLICATION PROCESSING AND CALCULATIONS		PROCESSED BY J. West

Identification of the proposed control methods for each junction box (as necessary)	√	Information on junction boxes is also provided in the 5/15/13 submittal
Complete descriptions of any alternate DSC controls.	NA	No alternate DSC controls proposed

*NON-EMITTING DSC is a DSC which is controlled using a gas tight barrier between the sewer and the atmosphere that for the most recent six month period does not emit VOC emissions, or is a DSC which is uncontrolled that for the most recent 24 month period does not emit VOC emissions, as measured pursuant to paragraph (h)(1) in excess of 10 ppm above background level.
 LOW-EMITTING DSC is a DSC that has not emitted excess emissions for the most recent six month period or is effectively controlled pursuant to subparagraph (e)(7)(A).
 HIGH-EMITTING DSC is a DSC that has at least one excess emission in the most recent six months.
 REPEAT-EMITTING DSC is a petroleum refinery DSC that has emitted excess emissions at least three times during any consecutive 12 months, unless it has been effectively controlled pursuant to subparagraph (e)(7)(A). [1176(c)(8)(A)-(D)]

Table 1 indicates that the facility has submitted all of the necessary information for the Rule 1176 Plan, and is in compliance with the plan requirements.

RECOMMENDATIONS

The Rule 1176 Compliance Plan submitted by Ultramar Inc. has been evaluated and found to comply with the applicable requirements specified in the rule. Approval of this plan, and inclusion in Section I of the facility’s Title V Facility Permit is recommended, subject to the following conditions:

1. As the result of selecting the compliance option specified in Rule 1176(e)(7)(A) for repeat emitting drain system components (DSCs), your facility shall comply with the following schedule:
 Within 60 days or longer, as approved by the Executive Officer, after a DSC becomes a repeat emitting DSC, effectively control the DSC by installing a DSC control, if previously uncontrolled, or a more efficient DSC control to eliminate excess emissions from the DSC.

 Repeat-emitting DSC is a DSC that has emitted VOC, measured pursuant to paragraph (h)(1) of Rule 1176, greater than 500 ppm above background levels at least three times during any consecutive 12 months.
2. As a result of selecting the compliance option specified in Rule 1176(e)(7)(A) for repeat emitting DSCs, the operator shall inspect and monitor wastewater separators, closed vent systems, and all DSCs in accordance to the requirements of Rule 1176(f)(1)(A).
3. All new process drains installed after September 13, 1996 shall be equipped with water seal controls, or alternative controls as approved by the Executive Officer.