

 <p>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p>ENGINEERING AND COMPLIANCE DIVISION</p> <p>APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 4	PAGE 1
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RULE 1176 – VOC EMISSIONS FROM WASTEWATER SYSTEM PLAN EVALUATION

FACILITY INFORMATION

TESORO REFINING & MARKETING CO.
 ID# 800436
 TITLE V: YES
 RECLAIM: NOX, SOX
 ZONE: COASTAL
 CYCLE: 1

MAILING ADDRESS

P.O. BOX 817,
 WILMINGTON, CA 90748-0817

EQUIPMENT LOCATION

2101 E. PACIFIC COAST HIGHWAY
 WILMINGTON, CA 90744

CONTACT INFORMATION

Royann Winchester
 (310) 522-6125

BACKGROUND:

Tesoro submitted this Rule 1176 compliance plan application for their refinery in the city of Wilmington, California. This facility was formerly owned by Equilon (ID 800370) and was purchased by Tesoro in May, 2007. Tesoro operates wastewater systems and associated control devices located in the refinery, and thus the equipment is subject to all applicable requirements of Rule 1176. Per subparagraph (d)(2) of this rule, refineries are required to submit a compliance plan to the District for review and approval. Tesoro's submitted this compliance plan to comply with the rule on dated December 6, 2007. Tesoro specifies in the plan that the refinery will comply with the control requirement for drain system components (DSCs) in accordance with Rule 1176 subparagraph (e)(7)(A).

Subparagraph (d)(2) of Rule 1176 lists the items that the owner or operator of a petroleum refinery shall include in a proposed Rule 1176 VOC Emissions from Wastewater Systems Plan. Tesoro has submitted with its Rule 1176 compliance plan all the required information as indicated in Table 1.

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TABLE 1: Required information of a Rule 1176 Compliance Plan

Requirements	Per Rule 1176 (d)(2)	Compliance		Remarks
		Yes	No	
A statement indicating whether option (e)(7)(A) or (e)(7)(B) has been chosen for compliance determination	(A)	√		Tesoro has chosen to comply with paragraph (e)(7)(A). See the attached email by Royann Winchester confirming Tesoro compliance option .
A detailed schematic drawing of the facility showing: (1) the location of the wastewater systems (2) the locations of all air pollution control (APC) equipment associated with the wastewater systems	(B)	√ √		Attachment 2 of the proposed plan includes drawings showing the locations of the wastewater systems and associated control equipment within the refinery.
A complete drain system component (DSC) list includes: (1) the total number of DSCs (2) the location of each DSC (3) type of control of each DSC if controlled (4) identification of each DSC as either non-emitting, low emitting, high emitting or repeat emitting according to Rule 1176(d)(2)(C).	(C)	√ √ √ √		Attachment 1 of the proposed plan includes the complete DSC list which has all of the information required by this paragraph. Tesoro has over 2000 DSCs
Historical monitoring data during the most recent 24 months	(D)	√		Tesoro has submitted monthly monitoring data for all DSCs that were taken from December 2006 through November 2007. Since the plan was submitted on December 6, 2007, the data meets the initial monitoring frequency requirement specified by paragraph (f)(1)(A). (Attachment 3). Tesoro also submitted in Attachment 4 Rule 1176 monitoring records for the last two years from 9/2010 to 9/2012.
Description of the proposed method of control if necessary	(E)	N/A		No control method proposed

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Requirements	Per Rule 1176 (d)(2)	Compliance		Remarks
		Yes	No	
Description of any alternative DSC controls and their specific applications	(F)	N/A		No alternative control method proposed.

The Rule 1176 VOC Emissions from Wastewater Systems Plan as proposed by Tesoro complies with the requirements specified in Subparagraph (d)(2) of the rule.

EVALUATION OF OTHER REQUIREMENTS

Rule 1176 —VOC Emissions from Wastewater Systems (Amended 9/13/96)

(e)(1) Wastewater system and closed vent system emissions: 500 ppm or less above background level emission limit is required for these systems. Inspection and monitoring requirements specified in Subparagraph (f) will ensure compliance to the emission limit. The DSCs comply with this requirement.

(e)(2) Cover meeting the requirements specified in Subparagraph (B) are provided to the sumps and wastewater separators. The DSCs comply with this requirement.

(e)(3) All sewer lines are completely enclosed, and the covers of their manholes are completely sealed. The DSCs comply with this requirement.

(e)(4) All process drains installed after September 13, 1996 is conditioned by the plan approval letter to be equipped with water seal controls or any equivalent alternative controls as approved by the Executive Officer. The DSCs comply with this requirement.

(e)(5) The junction boxes of the wastewater systems are totally enclosed. The DSCs comply with this requirement.

(e)(6) The air pollution control (APC) equipment of the wastewater systems comply with the requirement specified in Subparagraph (B): emission limit at the outlet of an APC shall be less than 500 ppm above background level. Monitoring of the exhaust of the APCs will be done monthly in pursuant to Rule 1118(f). The DSCs comply with this requirement.

(e)(7) Tesoro has chosen to comply with option (A) of this requirement: installing a DSC control within sixty (60) days to a repeat emitting DSC.

(f)(1)(A) Inspection and monitoring frequency: Tesoro has performed monitoring of all DSCs in accordance to the frequency specified in Table 2, or as provided in Subparagraph (ii) when all the specified requirements are met. The DSCs comply with this requirement.

(g)(1) Recordkeeping: Tesoro has complied with the recordkeeping requirements specified in this Subparagraph (see attached Tesoro's Rule 1176 Quarter Reports for the last year) . The DSCs comply with this requirement.

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(g)(2) Reporting: Tesoro has complied with the reporting requirements specified in this Subparagraph. (see attached Tesoro's Rule 1176 Quarter Reports for the last year) . The DSCs comply with this requirement.

RECOMMENDATIONS:

As shown in the plan evaluation section, Tesoro's Rule 1176 VOC Emissions from Wastewater Systems Plan as proposed complies with the applicable requirements of the rule. Therefore, issuance of an approval letter for Tesoro's Rule 1176 compliance plan is recommended with the conditions to ensure compliance with the rule.

Attachments

1.	Drain System Component List
2.	Drawings
3.	Historical Monitoring Data
4	Monitoring records for the last two years from 9/2010 to 9/2012