

ENGINEERING EVALUATION REPORT

RULE 1166 COMPLIANCE PLAN
VOC CONTAMINATED SOIL MITIGATION PLAN

Facility Information

**BP WEST COAST PRODUCTS LLC – BP CARSON
 REFINERY
 ID# 131003
 TITLE V: YES
 ZONE: N/A
 CYCLE: 2**

Mailing Address

**P.O. BOX 6210
 CARSON, CA 90749**

Equipment Address

**2350 East 223RD STREET
 CARSON, CA 90810**

Contact Information

**ERIC DALEY
 (310) 847 – 5636**

BACKGROUND:

Application No. 520022 was submitted for the Rule 1166 Site Specific compliance plan by the BP Carson refinery. This compliance plan will be used to perform general grading/excavation and other soil movement activities within the refinery. The total volume of VOC contaminated soil excavated under this plan is estimated to be 10,000 cubic yards, and within a period of two years.

PLAN EVALUATION

Checklist for a Rule 1166 Site-Specific Mitigation Plan

Requirements	Attch. A Item #5	Compliance		Remarks
		Yes	No	
Reason for excavation or grading	(A)	√		Various projects in the refinery which include piping replacement, demolitions projects, and response to spills
Cause of contamination; history of site	(B)	√		Refinery is located on 630 acres, and began operations in 1923. Site is currently under a Cleanup and Abatement Order with Los Angeles Regional Water Quality Control Board
Description of equipment and piping associated with the soil contamination	(C)	√		Various, including refinery process equipment, tanks, and piping

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ENGINEERING AND COMPLIANCE DIVISION
REFINERY & WASTE MANAGEMENT PERMITTING

Page 2 of 3
 Appl. number 520022
 Processed by Hanh Le
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 Date 5/5/2011

ENGINEERING EVALUATION REPORT

Requirements	Attech. A Item #5	Compliance		Remarks
		Yes	No	
An estimate of the amount of contaminated soil	(D)	√		10,000 cubic yards
Operating schedule for excavation and removal	(E)	√		To be determined, as needed. AQMD will be notified for each excavation event
Description of how excavation or grading will be conducted	(F)	√		Using backhoes, shovels, jack hammers, and excavators, as appropriate
Description of mitigation measures taken for: (1) Dust (2) Odors (3) VOC	(G)	√ √ √		- Limit stockpiles of VOC-contaminated soils to 400 cubic yards. - Spray VOC-contaminated stockpiles and excavation work area with water and/or approved vapor suppressant and cover with plastic sheeting for all periods of inactivity of more than 1 hour. - Daily inspection of VOC-contaminated soil stored in drum, bins or stockpiled, as required by Rule 1166
Description of disposal method of VOC-contaminated soil including the name of the ultimate receptor	(H)	√		Landfill of VOC-contaminated soil at Waste Management - Kettleman or other permitted TSDF
Description of monitoring equipment and techniques	(I)	√		Mini Rae / OVA Model 2000
A map with dimensions showing: (1) the facility layout (2) the property line (3) the surrounding area within 2500 feet of the property line (4) the location of any schools, residential areas, or other sensitive receptors such as hospitals, or locations where children and elders live or work.	(J)	√ √ √ √		No hospital or school is located within 2500 ft of the facility. See map on the next page.
Name of the person designated to conduct site inspection	(K)	√		Waste Contractors personnel or others hired by BP

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ENGINEERING AND COMPLIANCE DIVISION
REFINERY & WASTE MANAGEMENT PERMITTING**

ENGINEERING EVALUATION REPORT

Page	3 of 3
Appl. number	520022
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RECOMMENDATIONS:

BP's proposed Rule 1166 compliance plan contains all of the required information and complies with all applicable requirements specified by Rule 1166. Therefore, the plan is recommended for approval with conditions to ensure that the excavation, grading and handling of VOC-contaminated soil comply with the plan and requirements of Rule 1166.

Pursuant to item # 1, 7 & 8 in Attachment A of Rule 1166, conditions and requirements of the approved plan specify the followings:

1. General requirements—the plan is not transferable; the person responsible for the excavation, grading or handling of VOC contaminated soil must be completely familiar with the plan and must adhere to the plan requirement; permission to excavate, grade or handle VOC contaminated soil may be withdrawn by the District.
2. Procedures for ensuring responsibility for the implementation of the plan.
3. Accessibility to the site for AQMD staff.
4. Notification of actions.
5. Identification of emission receptors.
6. Monitoring and testing.
7. Suppression and covering of stockpiles.
8. Prevention of public nuisance from VOC or dust emissions.
9. Prevention of fugitive emissions of VOC.
10. Recordkeeping to demonstrate compliance with the plan.