

	SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE APPLICATION PROCESSING AND CALCULATIONS	PAGES: 5	PAGE: 1
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		PROCESSED BY: Meredith Hankins	CHECKED BY:

RULE 1166 COMPLIANCE PLAN

VOC CONTAMINATED SOIL MITIGATION PLAN

COMPANY NAME: Chevron Products Co.

COMPANY ID: 800030

MAILING ADDRESS: 324 El Segundo Blvd
El Segundo, CA 90245

EQUIPMENT LOCATION: 324 El Segundo Blvd
El Segundo, CA 90245

CONTACT INFORMATION: Al Andrade
(310) 615-3219

Bob Robbins
(310) 615-4148

BACKGROUND:

Irwin Industries submitted this site specific Rule 1166 VOC Contaminated Soil Mitigation Plan application on Chevron's behalf on June 9, 2010. This application requests a 2nd extension for the Soil Mitigation Plan originally issued to Chevron under A/N 487174 and then extended under A/N 497738. See Table 2 for relevant permitting history. The first two Rule 1166 plans were submitted for two purposes: to relocate a soil stockpile located north of Tank #944 (see refinery plot plan in Attachment A) and to begin excavation for the construction of Tank #943. The soil stockpile was successfully relocated under the first two Rule 1166 plans, and this newly submitted plan is solely for final excavation and grading prior to the construction of Tank #943.

The proposed project is for excavation and grading in order to begin construction of a new domed tank (Tank #943, P/C issued and extended under A/N 469794). Initial soil tests do not indicate VOC-contaminated soil is present, however Chevron is submitting this Site Specific Rule 1166 Plan with the expectation that the excavation activities may uncover VOC contaminated soil (based on past experience).

The 400-CEQA form submitted by Chevron triggered CEQA review because the proposed excavation covers an area greater than 20,000 square feet. After consulting with the District's CEQA team, Chevron submitted detailed emission calculations performed by Environmental Audit to demonstrate that no significant impact would occur as a result of this project. Therefore, no further CEQA analysis was required. See Attachment D for more information.

The subject application which will be covered by this evaluation is summarized below in Table 1.

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Table 1 – AQMD Applications Submitted

A/N	Equipment	Type	Status	Date Submitted	Requested Action
511724	1166 Soil Mitigation Plan	21	25	6/15/10	<ul style="list-style-type: none"> Approve Rule 1166 Plan in an expeditious fashion

The relevant permitting history for this project is shown below in Table 2.

Table 2 – Relevant Permitting History

A/N	Date Submitted	Application		Description
		Status	Type	
487174	8/29/08	32	25	Site Specific Rule 1166 Soil Mitigation Plan (expired 3/31/09) submitted to relocate soil stockpile and begin excavation for Tank 943 foundation.
497738	4/10/09	32	25	Site Specific Rule 1166 Soil Mitigation Plan (expired 5/1/10) submitted to relocate soil stockpile and begin excavation for Tank 943 foundation.
511724	6/15/10	21	25	Site Specific Rule 1166 Soil Mitigation Plan submitted to complete excavation and grading for Tank 943 foundation.

Note that a review of Chevron’s compliance history over the past 5 years shows no NOV’s or NCs issued relating to excavation for this project (or for any other site-specific excavation and soil mitigation projects).

The fees submitted with this application are shown below in Table 3.

Table 3 – Fee Summary

A/N	Equipment	Type	Fee Sched.	Fee Paid	Balance Due
511724	1166 Soil Mitigation Plan	25	C + XPP	\$758.03	\$0.00*

**Note that Chevron will be billed for appropriate T&M according to Rule 306.*

PLAN EVALUATION:

As Chevron is proposing to excavate up to 5,702 cubic yards of soil materials which could possibly be VOC-contaminated, the company is subject to all applicable requirements of a site-specific plan specified by Rule 1166:

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Table 4 – Checklist for a Rule 1166 Site-Specific Mitigation Plan

Requirements	Per Rule 1166 Attach. A #5	Compliance?		Remarks
		Yes	No	
Reason for excavation or grading	(A)	√		To excavate and grade for a new tank foundation.
Cause of contamination; history of site	(B)	√		Soil to be excavated/graded is not expected to be contaminated, but VOC contaminated soil may be uncovered as a result of historical refinery practices
Description of tanks and piping associated with the soil contamination	(C)	√		No tank or underground piping would be associated with the excavation
An estimate of the amount of possible contaminated soil	(D)	√		5,702 cubic yards (200' W x 200' L x 4' D) Note that this area triggered CEQA review per the District's 400-CEQA form, but it was determined that the project would not have a significant impact (see Attachment D).
Operating schedule for excavation and removal	(E)	√		10 hours per day, 6 days per week for up to 1 year
Description of how excavation or grading will be conducted	(F)	√		Backhoes and excavators will be used to stockpile soil and then containerize or load directly it into end loader trucks.
Description of mitigation measure taken for: (1) Dust (2) Odors (3) VOC	(G)	√		Water will be applied at sufficient frequency to prevent visible emissions. Plastic sheeting will be used to cover exposed work faces and stockpiles when inactive for 1 or more hours.
Description of the disposal method of VOC-contaminated soil including the name of the ultimate receptor	(H)	√		VOC contaminated soil will be placed in closed containers and transported to a Class 1 landfill or if soil is deemed acceptable for recycling, will be transported to: Chemical Waste Management-

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Requirements	Per Rule 1166 Attach. A #5	Compliance?		Remarks
		Yes	No	
				KHF 35251 Old Skyline Road Kettleman City, CA 93239 (800) 222-2964 US EPA ID: CAT000646117 OR TPST-Soil Recyclers of California 12328 Hibiscus Road Adelanto, CA 92301 (760) 246-8001 US EPA ID: CAL000298752
Description of the monitoring equipment and techniques	(I)	√		Will use OVA and follow procedures specified in conditions for plan approval
A map with dimensions showing: (1) The facility layout (2) The property line (3) The surrounding area within 2,500 feet of the property line (4) The location of any schools, residential areas, or other sensitive receptors such as hospitals, or locations where children or elders live or work	(J)	√		See Attachment A for plot plan and Attachment B for maps.
Name of the person designated to conduct site inspection	(K)	√		Mr. Bob Robbins Environmental Field Specialist Chevron Refinery El Segundo, CA (310) 615-4148

RECOMMENDATIONS:

Chevron's proposed site-specific 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.

Note that inclusion of this site-specific Rule 1166 Plan in Section I of Chevron's Facility Permit qualifies as a Minor Revision to their Title V permit. TV A/N 512717 was submitted for the purpose

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of revising the Title V permit. Accordingly, draft approval of this plan will be sent to EPA for a 45 day review prior to issuance.

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

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.