

	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: Bob Robbins
(310) 615-4148

BACKGROUND:

Chevron submitted this site specific Rule 1166 VOC Contaminated Soil Mitigation Plan application on June 23, 2010. This application replaces the Soil Mitigation Plan originally issued to Chevron under A/N 486202. See Table 2 for relevant permitting history. A/N 486202 was submitted as a continuation of a previous project undertaken by Lovco Construction Inc. under A/N 479271. See Attachment A for relevant copies of previous plans issued for this project.

This project was initially planned to be completed by 4/30/09. However, due to budgetary reasons, this project was delayed until 9/1/10. Therefore, the subject application was submitted to extend the project to 9/1/11.

The project covered by this series of plans is for excavation for new construction of Sulfur Recovery Unit (SRU) No. 73. The P/Cs for the construction of SRU No. 73 (among other equipment) were issued May 14, 2010. 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 subject application which will be covered by this evaluation is summarized below in Table 1.

Table 1 – AQMD Applications Submitted

A/N	Equipment	Type	Status	Date Submitted	Requested Action
512941	1166 Soil Mitigation Plan	21	25	7/28/10	• Approve Rule 1166 Plan

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

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Table 2 – Relevant Permitting History

A/N	Date Received	Application		Description
		Status	Type	
479271	3/12/08	32	25	Site Specific Rule 1166 Soil Mitigation Plan (expired 9/15/08) submitted for excavation necessary for construction of SRU No. 73.
486202	8/1/08	32	25	Site Specific Rule 1166 Soil Mitigation Plan (expired 4/30/09) submitted for excavation necessary for construction of SRU No. 73.
512941	7/28/10	21	25	Site Specific Rule 1166 Soil Mitigation Plan submitted to complete excavation for construction of SRU No. 73.

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
512941	1166 Soil Mitigation Plan	25	C	\$758.09	\$0.00*

*The plan fees shall be evaluated for appropriate T&M according to Rule 306.

PLAN EVALUATION:

As Chevron is proposing to excavate up to 7,674 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:

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 new construction of SRU No. 73.
Cause of contamination; history of site	(B)	√		Underground piping leak and past spillages from filling at the refinery.
Description of tanks and piping associated with the soil contamination	(C)	√		No tanks will be excavated with project. Underground abandoned pipeline is not



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Requirements	Per Rule 1166 Attach. A #5	Compliance?		Remarks
		Yes	No	
				expected by may be encountered since the location is a refinery and there are possible historic subsurface pipeline leaks at this location.
An estimate of the amount of possible contaminated soil	(D)	√		7,674 cubic yards (370' W, 140' L, 4' D)
Operating schedule for excavation and removal	(E)	√		10 hours per day (6:30 AM to 4:30 PM), 5 days per week until September 1, 2011.
Description of how excavation or grading will be conducted	(F)	√		Using backhoe, excavator, and dump trucks.
Description of mitigation measure taken for: (1) Dust (2) Odors (3) VOC	(G)	√		Spray the soil with vapor suppression materials and/or approved vapor suppressant, cover stockpiles with plastic sheeting, or transport offsite immediately.
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-KHF 35251 Old Skyline Road Kettleman City, CA 93239 (800) 222-2964 US EPA ID: CAT000646117 OR Soil Recyclers of CA 12328 Hibiscus Road Adelanto, CA 92301 (760) 246-8001 US EPA ID: CAL000298752
Description of the monitoring equipment and techniques	(I)	√		Use OVA and follow procedures specified in conditions for plan approval

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Requirements	Per Rule 1166 Attach. A #5	Compliance?		Remarks
		Yes	No	
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 B for plot plan and maps. No hospital or school located within 2,500 feet of the facility.
Name of the person designated to conduct site inspection	(K)	√		Mr. Roger Hahn Sr. Environmental 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. Draft approval of this Rule 1166 plan will be submitted for a 45 day EPA review under TV A/N 512717 prior to the issuance of this permit. A final copy of the permit will be submitted to the EPA within 5 working days of its 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.

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9. Prevention of fugitive emissions of VOC.
10. Recordkeeping to demonstrate compliance with the plan.