



**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: Lunday-Thagard Company, Facility ID No. 800080
Mailing Address: 9302 Garfield Ave, South Gate, CA 90280
Equipment Location: 9301 Garfield Ave, South Gate, CA 90280
Contact Person: Grant T. Aguinaldo (562) 928-7000 x2259

COMPLIANCE RECORD REVIEW

A query of the AQMD Compliance Database for the past two years (12/1/11 to 12/3/13) identified 2 Notice of Violations (NOVs) that were issued to the Lunday-Thagard Company (Facility ID 800080). 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 \$505.35 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.

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 331374 on 6/30/97, but it was cancelled when it was superseded by the subject application in 2008. The facility submitted this updated Rule 1176 plan (A/N 494184) dated 12/17/08 to reflect the existing wastewater system configuration.

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) A statement regarding which compliance option was chosen: (e)(7)(A) or (e)(7)(B)	NA		Facility has no DSCs that are subject to Rule 1176; thus, no compliance option is necessary
B) A detailed schematic drawing of the location of the wastewater system within the facility identifying all associated APC devices	✓		The facility submitted a drawing "Site Map, West Side Facility Storm Water", which identifies areas containing DSCs and areas subject to applicable exemptions
C) 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* 	NA		NA; Facility has no DSCs that are subject to Rule 1176.
D) Historical monitoring data	NA		NA; No monitoring is required.
E) Identification of the proposed control methods for each junction box (as necessary)	NA		NA; Facility has no junction boxes that are subject to Rule 1176.
F) Complete descriptions of any alternate DSC controls.	NA		NA; none proposed

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION	APPL. NO. 494184	DATE 12/3/13	PAGE 3 of 3
	APPLICATION PROCESSING AND CALCULATIONS	PROCESSED BY J. West	CHECKED BY

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 Lunday-Thagard Company 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. Any change to the wastewater system or any other component required to be identified by Rule 1176(d)(2), shall be submitted to the District within 60 calendar days after construction is completed.
2. The facility shall revise this Rule 1176 compliance plan if and when new drain system components are added that are subject to Rule 1176 requirements.
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.