

ENGINEERING EVALUATION REPORT

RULE 1166 COMPLIANCE PLAN
VOC CONTAMINATED SOIL MITIGATION PLAN

Facility Information

VALERO WILMINGTON ASPHALT PLANT
ID# 800393
TITLE V: YES
RECLAIM: YES
ZONE: 1

Mailing Address

2402 EAST ANAHEIM STREET
WILMINGTON, CA 90744

Equipment Address

1651 ALAMEDA STREET
WILMINGTON, CA 90744

Contact Information

KATIE BIRGE
(562) 495 - 5490

BACKGROUND:

Valero Wilmington Asphalt Plant (WAP) submitted this site specific Rule 1166 VOC Contaminated Soil Mitigation Plan application on August 2, 2011. Valero is excavating the area designated in the plan because they are expanding the Asphalt Plant tank farm containment wall for SPCC (Spill Prevention, Control, and Countermeasure) compliance requirements. There is no known source of VOC contamination to be excavated, however, this application is submitted in case VOC-impacted soil is excavated during the expansion of the containment wall. Valero WAP estimated that approximately 2,000 cubic yards of potentially VOC impacted soil may be excavated during this project, which is anticipated to last approximately 16 months.

PLAN EVALUATION

Since Valero WAP proposes to excavate approximately 2,000 cubic yards of soil potentially containing VOC materials, the refinery is subject to all applicable requirements of a site-specific plan specified by Rule 1166.

Table 1. Checklist for a Rule 1166 Site-Specific Mitigation Plan

Requirements	Attach. A Item #5	Compliance		Remarks
		Yes	No	
Reason for excavation or grading	(A)	√		Expansion of Asphalt Plant tank farm containment

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION
REFINERY & WASTE MANAGEMENT PERMITTING

Page 2 of 5
 Appl. number 526019
 Processed by J. Nielsen
 Reviewed by
 Date 10/4/2011

ENGINEERING EVALUATION REPORT

Requirements	Attach. A Item #5	Compliance		Remarks
		Yes	No	
Cause of contamination; history of site	(B)	√		Unknown VOC contamination, mitigation is in the event of VOC impacted soil being excavated
Description of tanks and piping associated with the soil contamination	(C)	√		No tanks or piping will be excavated with the project.
An estimate of the amount of contaminated soil	(D)	√		Approximately 2,000 cubic yards
Operating schedule for excavation and removal	(E)	√		6:00AM – 4:00PM 4 days/week
Description of how excavation or grading will be conducted	(F)	√		Conducted as approved by City of Los Angeles Building Department. Using excavation equipment – including saw cutting of existing containment and excavation.
Description of mitigation measures taken for: (1) Dust (2) Odors (3) VOC	(G)	√ √ √		Dust suppression will be managed with a water truck. Stockpiles will be covered with plastic sheeting and sandbags at the end of each shift. Odors will be managed with an odorant spray if needed. Contaminated VOC soil will be stockpiled or covered on site, stored in sealed roll-off containers or removed immediately for treatment.
Description of disposal method of VOC-contaminated soil including the name of the ultimate receptor	(H)	√		VOC contaminated soil will be transported to a treatment facility located within AQMD: Thermal Remediation Solutions (TRS) located at 1211 W. Gladstone Street, Azusa, CA 91702 (FID 109904).

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION
REFINERY & WASTE MANAGEMENT PERMITTING

Page 3 of 5
 Appl. number 526019
 Processed by J. Nielsen
 Reviewed by
 Date 10/4/2011

ENGINEERING EVALUATION REPORT

Requirements	Attach. A Item #5	Compliance		Remarks
		Yes	No	
Description of monitoring equipment and techniques	(I)	√		Use TVA and sample at the excavator bucket and stockpile and follow procedures specified by plan approval conditions.
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 and elders live or work.	(J)	√ √ √ √		An aerial photo of the area to be excavated to expand the Asphalt Plant tank farm containment showing receptors within 2,500 feet of the leak area was provided and shown in Appendix A. There are residential areas and a park within 2,500 feet of the excavation area.
Name of the person designated to conduct site inspection	(K)	√		Ms. Katie Birge at Valero WAP

RECOMMENDATIONS:

Valero'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 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.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION
REFINERY & WASTE MANAGEMENT PERMITTING

ENGINEERING EVALUATION REPORT

Page	4 of 5
Appl. number	526019
Processed by	J. Nielsen
Reviewed by	
Date	10/4/2011

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.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION
REFINERY & WASTE MANAGEMENT PERMITTING

ENGINEERING EVALUATION REPORT

Page	5 of 5
Appl. number	526019
Processed by	J. Nielsen
Reviewed by	
Date	10/4/2011

Appendix A – Aerial Photo of Area Surrounding the Lagoon Pipeline Leak