



Compliance and Enforcement Division
May 12, 2008
Compliance Advisory

This Advisory is provided to inform you about activities of the Air District which may affect your operation. It will help you achieve and maintain compliance with applicable air pollution regulations.

ATTENTION: PETROLEUM REFINERY AND CHEMICAL PLANT OPERATORS
SUBJECT: RESTRICTED OPERATIONS UPON PREDICTED EXCESS OF FEDERAL AND STATE OZONE STANDARDS

Certain Air District regulations require operators of the equipment listed below to curtail VOC (Volatile Organic Compound) emissions on days when excesses of the Federal and/or State ambient ozone standards are predicted to occur (typically starting in June and ending in mid-October). Tank degassing operations are affected by both Federal and State ozone standards. Wastewater systems and process depressurization vessels operations are affected only by Federal ozone standards.

- **TANK DEGASSING** (Regulation 8-5-328): Tank degassing shall not commence on an Air District predicted day of a forecasted excess of the **Federal ozone standard** and the **State ozone standard** unless an abatement device which collects and processes all organic vapors and gases and has an abatement efficiency of $\geq 90\%$ by weight. The abatement system shall be operated until the residual concentration in the tank reaches $<10,000$ ppm as methane for at least four consecutive measurements performed at intervals no shorter than 15 minutes each.
- **WASTEWATER COLLECTION AND SEPARATION SYSTEMS** (Regulation 8-8-114): Industrial process wastewater systems are prohibited from bypassing the oil-water separation system or air flotation unit for any reason on the day of a forecasted excess of the **Federal ozone standard**.
- **PROCESS VESSEL DEPRESSURIZATION** (Regulation 8-10-302): No process vessels with an internal concentration of total organic compounds of $\geq 10,000$ ppm can be opened on the day of a forecasted excess of the **Federal ozone standard**.

The Federal standard for ambient ozone concentration is currently 0.08 ppm and the State standard is 0.07 ppm, averaged over any eight hours in a calendar day. The Air District does not publish predicted ambient ozone concentration but expresses the predicted ambient ozone concentration as an AQI (Air Quality Index) number. The Federal ambient ozone standard concentration is equal to an AQI of 101. The State ambient ozone standard concentration is equal to an AQI of 66. AQI's for the five geographic Bay Area regions are forecast for the next calendar day at 1:30 p.m. and are published at www.sparetheair.org.

Facilities subject to the requirements listed above must:

- Check the District's daily forecast and use the highest AQI of all five regions of the Bay Area to determine whether or not a Federal and/or State ozone standard exceedance is predicted for any day on which any of the actions subject to the requirements listed above is intended to be performed.
- If an exceedance of either the Federal or State ozone standard is predicted, curtail VOC emissions to comply with any applicable regulation above. NOTE: ALL THREE OPERATIONS ARE SUBJECT TO RESTRICTIONS BASED ON EXCEEDANCE OF THE FEDERAL OZONE STANDARD. TANK DEGASSING IS ADDITIONALLY SUBJECT TO THE STATE OZONE STANDARD.
- Enroll in the automatic Spare the Air e-mail notification system at www.sparetheair.org or by calling (800) HELP-AIR in order to receive advance notice of predicted Federal ozone standard excess.

More Information can be obtained from the following sources:

- ☎ For questions about this Advisory, contact Magen Harris, Air Quality Specialist, at mharris@baaqmd.gov or (415) 749-4785.
- ☎ For a copy of the above-listed rules, see www.baaqmd.gov/dst/regulations/index.htm.
- ☎ For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline.

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