
This Advisory is provided to inform you about activities of the District which may affect your operation. It is intended to assist you in your effort to achieve and maintain compliance with applicable air pollution rules and regulations.

ATTENTION: REFINERY AND CHEMICAL FACILITY OPERATORS

SUBJECT: REGULATION 8, RULE 10, REQUIREMENTS

On January 21, 2004, the Bay Area Air Quality District Management Board of Directors adopted changes to Regulation 8, Rule 10: Process Vessel Depressurization (Reg. 8-10) to expand its applicability to a wider number of process vessels at refineries and chemical facilities. Process vessel depressurization occurs when vessels in use for manufacturing at refinery or chemical facilities are opened to the atmosphere. This regulation seeks to reduce the amount of ozone-forming and toxic organic compounds released to the atmosphere.

Applicability of Rule

To determine if the new requirements affect your facility or operations please review the following:

What Types of Facilities Are Subject to Reg. 8-10?

- Refinery and chemical facilities engaged in the manufacture by chemical process of organic or inorganic chemicals with a North American Industrial Classification Standard (NAICS) code number of 32411
- Any facility whose NAICS code number begins with 325.

What Vessels Are Subject to Reg. 8-10?

- Process vessels **in excess of 100 cubic feet (ft³) in volume** that are used for the fractionation, chemical reaction, washing or purification of organic compounds and are to be depressurized.

What Processes and Equipment Are Not Subject to Reg. 8-10?

- Vessels of less than 100 cubic feet (ft³) in volume
- Vessels subject to specified District rules:
 - Storage of Organic Liquids (tank storage) (Reg. 8-5)
 - Pharmaceutical and Cosmetic Manufacturing Operations (Reg. 8-24)
 - Coating, Ink and Adhesive Manufacturing (Reg. 8-35)
 - Resin Manufacturing (Reg. 8-36)
 - Vegetable Oil Manufacturing Operations (Reg. 8-41)
 - Polyester Resin Operations (Reg. 8-50)
 - Polystyrene, Polypropylene, and Polyethylene Foam Product Manufacturing Operations (Reg. 8-52)
- Batch process operations that require periodic opening of a vessel as part of its routine operations.

Reporting Deadlines

The following is a list of new reporting dates contained in Reg. 8-10:

Key Requirements	Due Date
Facilities must submit an initial report listing each process vessel subject to the regulation, its volumes in cubic feet (ft ³), and the service(s) in which it is being used.	April 1, 2004
Facilities must submit an annual report containing all information required by Section 503 of Reg. 8-10.	Annually on Feb 1

Section 503 requires the following information: (1) the date, time, type of activity, and duration of depressurization and vessel opening, (2) the type of service, size and name or vessel identification number, (3) the measured total organic compound concentration and calculated mass emissions from each depressurized vessel, including the sampling location and any assumptions made in calculating the mass emissions, and (4) the number and size of any air movers used to assure compliance with confined space entry requirements.

New Provisions for Opening a Process Vessel

New Section 302.1 requires the internal concentration of total organic compounds be reduced to be **less than 10,000 ppm** before opening a process vessel to the atmosphere.

New Section 302.2 allows an exception to the requirement in Section 302.1. It allows a vessel to be opened when the internal concentration is **equal to or greater than 10,000 ppm**, only if the following three additional provisions are met:

- Total number of such vessels (opened when internal concentration \geq 10,000 ppm) does not exceed 10% of the total process vessel population, AND
- Total amount of emissions from the open vessel(s) does not exceed 15 lb/day, AND
- No vessel shall be opened on any day on which the APCO predicts an exceedance of an NAAQS for ozone or declares a Spare the Air Day.

Any and all vessel(s) opened when the internal concentration is \geq 10,000 ppm, and the above requirements are not met, will be in violation on that day. In addition, any vessel(s) determined to be in violation would then not count against the 10% allowance of Section 302.2.

If you have any further needs, please review the following:

-  For a copy of this rule, go to the link: <http://www.baaqmd.gov/dst/regulations/rq0810.pdf>
-  For further questions on Reg. 8-10, call Damian Breen at (415) 749-5041 or send e-mail to dbreen@baaqmd.gov

Kelly J. Wee
Director of Enforcement

KW:DB

**REGULATION 8
ORGANIC COMPOUNDS
RULE 10
PROCESS VESSEL DEPRESSURIZATION**

INDEX

8-10-100 GENERAL

- 8-10-101 Description
- 8-10-110 Exemption, Equipment Subject to Other Rules
- 8-10-111 Deleted, January 21, 2004
- 8-10-112 Limited Exemption, Measurement Periods
- 8-10-113 Exemption, Small Vessels
- 8-10-114 Exemption, Batch Processes

8-10-200 DEFINITIONS

- 8-10-201 Chemical Plant
- 8-10-202 Petroleum Refinery
- 8-10-203 Process Unit
- 8-10-204 Process Vessel
- 8-10-205 Organic Compound
- 8-10-206 Total Organic Compound

8-10-300 STANDARDS

- 8-10-301 Process Vessel Depressurizing
- 8-10-302 Opening of Process Vessels

8-10-400 ADMINISTRATIVE REQUIREMENTS

- 8-10-401 Reporting
- 8-10-402 Deleted January 21, 2004

8-10-500 MONITORING AND RECORDS

- 8-10-501 Monitoring
- 8-10-502 Concentration Measurement
- 8-10-503 Records

8-10-600 MANUAL OF PROCEDURES

- 8-10-601 Monitoring Procedures

**REGULATION 8
ORGANIC COMPOUND
RULE 10
PROCESS VESSEL DEPRESSURIZATION**

8-10-100 GENERAL

8-10-101 Description: The purpose of this Rule is to limit emissions of organic compounds from depressurizing and opening of process vessels at petroleum refineries and chemical plants.

(Amended 3/17/82; 7/20/83; 1/21/04)

8-10-110 Exemption, Equipment Subject to Other Rules: The provisions of this rule shall not apply to vessels that are subject to the following Regulation 8 rules:

- 110.1 Regulation 8, Rule 5: Storage of Organic Liquids
- 110.2 Regulation 8, Rule 24: Pharmaceutical and Cosmetic Manufacturing Operations
- 110.3 Regulation 8, Rule 35: Coating, Ink and Adhesive Manufacturing
- 110.4 Regulation 8, Rule 36: Resin Manufacturing
- 110.5 Regulation 8, Rule 41: Vegetable Oil Manufacturing Operations
- 110.6 Regulation 8, Rule 50: Polyester Resin Operations
- 110.7 Regulation 8, Rule 52: Polystyrene, Polypropylene, and Polyethylene Foam Product Manufacturing Operations

(Amended January 21, 2004)

8-10-111 Deleted January 21, 2004

8-10-112 Limited Exemption, Measurement Periods: The provisions of Section 8-10-301 shall not apply while a process vessel is opened for a period of time reasonably necessary for measurements to determine compliance with the concentration and mass emission limits of this rule.

(Adopted January 21, 2004)

8-10-113 Exemption, Small Vessels: The provisions of this Rule shall not apply to any process vessel with a volume of less than 100 cubic feet (ft³).

(Adopted January 21, 2004)

8-10-114 Exemption, Batch Processes: The provisions of this rule shall not apply to any process vessel used in a batch process operation that requires periodic vessel opening as part of the routine operation of the vessel, including but not limited to delayed coking vessels.

(Adopted January 21, 2004)

8-10-200 DEFINITIONS

8-10-201 Chemical Plant: Any facility engaged in producing organic or inorganic chemicals and/or manufacturing products by chemical processes. Any facility or operation that has 325 as the first three digits in the North American Industrial Classification Standard (NAICS) code. Chemical plants may include, but are not limited to the manufacture of: industrial inorganic and organic chemicals; plastic and synthetic resins, synthetic rubber, synthetic and other man made fibers; drugs; soap, detergents and cleaning preparations, perfumes, cosmetics and other toilet preparations; paints, varnishes, lacquers, enamels and allied products; agricultural chemicals; safflower and sunflower oil extracts; re-refining.

(Adopted 7/20/83; Amended 1/21/04)

8-10-202 Petroleum Refinery: Any facility that processes petroleum, as defined in the North American Industrial Classification Standard No. 32411 (1997).

(Adopted 7/20/83; Amended 1/21/04)

8-10-203 Process Unit: A manufacturing process which is independent of other processes and is continuous when supplied with a constant feed of raw materials and sufficient storage facilities for the final product.

(Adopted 7/20/83)

8-10-204 Process Vessel: Any vessel in which organic compounds are fractionated, chemically reacted, washed or purified. These vessels shall include but are not

limited to reactors, columns, accumulator vessels, knockout pots, surge/settling drums and other similar devices.

(Renumbered 7/20/83; Amended 1/21/04)

8-10-205 Organic Compound: Any compound of carbon, excluding methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates and ammonium carbonate.

(Adopted January 21, 2004)

8-10-206 Total Organic Compound: All organic compounds of carbon including methane, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates and ammonium carbonate.

(Adopted January 21, 2004)

8-10-300 STANDARDS

8-10-301 Process Vessel Depressurizing: Emissions of organic compounds from depressurizing any process vessel at a petroleum refinery or a chemical plant shall be controlled by venting them to a fuel gas system, firebox, incinerator, thermal oxidizer, flare, or otherwise containing and treating them so as to prevent their emissions to the atmosphere. Such procedures shall continue until the pressure within the process vessel is as close to atmospheric pressure as practicably possible, in no case shall a process vessel be vented to the atmosphere until the partial pressure of organic compounds in that vessel is less than 1000 mm Hg (4.6 psig).

(Amended 3/17/83; 3/20/83; 1/21/04)

8-10-302 Opening of Process Vessels: Effective July 1, 2004, no process vessel may be opened to the atmosphere except as provided below:

302.1 No process vessel may be opened to the atmosphere unless the internal concentration of total organic compounds has been reduced prior to release to atmosphere to less than 10,000 parts per million (ppm), expressed as methane (C₁) except as provided in Section 8-10-302.2.

302.2 A process vessel at a refinery or chemical plant may be opened when the internal concentration of total organic compounds is 10,000 ppm or greater provided that the total number of such vessels opened with such concentration during any consecutive five year period does not exceed 10% of the total process vessel population as documented pursuant to section 8-10-401, and the organic compound emissions from the opening of these vessels shall not exceed 15 pounds per day. Vessels with an internal concentration of total organic compounds of 10,000 ppm or greater shall not be opened on any day on which the APCO predicts an exceedance of a National Ambient Air Quality Standard for ozone or declares a Spare the Air Day.

(Adopted January 21, 2004)

8-10-400 ADMINISTRATIVE REQUIREMENTS

8-10-401 Reporting: Any facility subject to the provisions of this rule shall submit an annual report to the Air Pollution Control Officer (APCO) containing the elements of Section 8-10-503. The annual report shall be submitted by February 1 of each year. By April 1, 2004, any facility subject to the provisions of this rule shall submit an initial report that lists all process vessels, it's volume in cubic feet, and it's service type. The list shall be updated yearly, as necessary, and submitted with the annual report.

(Amended 3/17/82, 7/10/83; 1/21/04)

8-10-402 Deleted January 21, 2004

8-10-500 MONITORING AND RECORDS

8-10-501 Monitoring: Any vessel subject to this rule shall be monitored for the concentration of total organic compounds prior to opening and once per day during the time the vessel is open to the atmosphere. The sample shall be a representative sample of the internal atmosphere of the vessel. This section shall not apply if it can be

demonstrated that the concentration of total organic compounds has been reduced to a concentration equal to or less than 100 ppm for three consecutive days.

(Adopted January 21, 2004)

8-10-502 Concentration Measurement: The meter used to measure the concentration of total organic compound emissions shall meet the accuracy requirements specified in EPA Method 21.

(Adopted January 21, 2004)

8-10-503 Records: Any facility subject to the provisions of this rule shall keep records of each vessel depressurization. The records shall include the following information:

503.1 The date, time, type of activity, and duration of depressurization and vessel opening,

503.2 The type of service, size and name or vessel identification number,

503.3 The measured total organic compound concentration and calculated mass emissions from each depressurized vessel, including the sample location and any assumptions made in calculating the mass emissions, and

503.4 The number and size of any air movers used to assure compliance with confined space entry requirements.

503.5 Records shall be maintained for at least 5 years and shall be made available to the APCO for inspection at any time.

(Adopted January 21, 2004)

8-10-600 MANUAL OF PROCEDURES

8-10-601 Monitoring Procedures: The procedures used to monitor emissions are set forth in EPA Method 21 (40 CFR Part 60, Appendix A).

(Adopted January 21, 2004)