

United States Environmental Protection Agency, Region IX

Air Division

Technical Support Document

for

EPA's Notice of Proposed Rulemaking

for the

California State Implementation Plan

South Coast Air Quality Management District

Rule 1176, VOC Emissions from Wastewater Systems

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Approved by Andrew Steckel

July 25, 2002

**South Coast Air Quality Management District (SCAQMD)**

**Submitted Rule**

- SCAQMD Rule 1176, VOC Emissions from Wastewater Systems (amended on September 13, 1996, submitted on November 25, 1996, submittal determined complete on February 12, 1997).

There are no other submitted versions on which EPA has not acted.

**Applicable SIP Rule**

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- SCAQMD Rule 1176, Sumps and Wastewater Separators (originally adopted on November 3, 1989, amended on May 13, 1994, approved on August 25, 1994, 59 FR 43751).

### Summary of Rule

Rule 1176 controls VOC emissions from wastewater systems, including sumps, wastewater separators, separator forebays, process drains, sewer lines, and junction boxes. Air pollution control (APC) devices receiving vapors from a closed vent system must achieve a control efficiency of 95% or not emit more than 500 ppm of VOC.

### Changes from the SIP Rule

Rule 1176 changes for refineries are as follows:

- Refineries will be required to either control with monitoring repeat-emitting drain system components (DSC) to 500 ppm or install controls on all DSCs with less monitoring.
- New process drains are required to have DSC controls.
- Monitoring frequencies are decreased for low-emitting and non-emitting DSCs.

Other Rule 1176 changes for all facilities are as follows:

- Bulk loading terminals are excluded.
- Separator forebays, clarifiers, and tanks are included.
- Schematic identification is required for some facilities for certain components with an accompanying list of all DSCs.
- The 500 ppm VOC limit applies to the entire wastewater system, and no openings are allowed in manhole covers.
- A requirement for the inspector to be certified is added.
- Requirements for recordkeeping and reporting are added.
- Certain exemptions are allowed for sources that would emit little or no VOCs.

### Rule Evaluation

Generally, SIP rules must be enforceable (see section 110(a) of the CAA), must require Reasonably Available Control Technology (RACT) for major sources in nonattainment areas (see section 182(a)(2) (A)), must not interfere with applicable requirements including requirements concerning attainment (see section 110(l)), and must not relax existing requirements in effect prior to enactment of the 1990 CAA amendments (see section 193). The SCAQMD regulates an extreme ozone nonattainment area. 40 CFR 81.305. Therefore Rule 1176 must fulfill RACT requirements.

Guidance and policy documents that we used to define specific enforceability and RACT requirements

include the following:

- *Requirements for Preparation, Adoption, and Submittal of Implementation Plans*, U.S. EPA, 40 CFR part 51.
- *Issues Relating to VOC Regulation, Cutpoints, Deficiencies, and Deviations* (the "Blue Book"), U.S. EPA, OAQPS (May 25, 1988).
- *Control of Refinery Vacuum Producing Systems, Wastewater Separators and Process Unit Turnarounds*, EPA-450/2-77-025 (October 1977).

SCAQMD staff estimates that the annual reduction in VOC emissions relative to the SIP rule is 1,117 tons per year. The rule fulfills RACT according to the October 1977 control technique guideline cited above. The rule is improved and more stringent and should be given full approval.

### **Recommended Action**

EPA recommends full approval under section 110(k)(3) of the CAA of the following rule for incorporation into the California Applicable SIP to replace the SIP rule cited above:

- SCAQMD Rule 1176, VOC Emissions from Wastewater Systems (amended on September 13, 1996, submitted on November 25, 1996).

### **Attachments**

1. Submitted SCAQMD Rule 1176.
2. SIP-Approved SCAQMD Rule 1176.
3. "Blue Book" (cover only).
4. *Control of Refinery Vacuum Producing Systems, Wastewater Separators and Process Unit Turnarounds*, EPA-450/2-77-025 (October 1977) (cover only).