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PREFACE

This document constitutes the Final Supplemental Environmental Assessment (SEA) for the amendments to Rule 1176 - Control of Emissions from Wastewater Systems. The Draft Supplemental EA was released for a 30-day public review and comment period that ended July 29, 1996. There were no adverse impacts associated with the proposed project and only one comment letter was received on the Draft Supplemental EA. The comment letter and the associated response are included as Appendix A. Minor modifications have been made to the Draft SEA, including to the project's description such that it is now a Final Supplemental EA. Modifications are denoted using ~~strikethrough~~ and *italics*, respectively.

CHAPTER 1

EXECUTIVE SUMMARY, AND PROJECT DESCRIPTION

Executive Summary
Legislative Authority
Preparation of a Supplemental Environmental Assessment
CEQA Documentation for Rule 1176
Project Description
Conclusion

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EXECUTIVE SUMMARY

Pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 *et seq.*), this document analyzes the potential environmental impacts of the proposed amendments to Rule 1176 - Volatile Organic Compound (VOC) Emissions from Wastewater Systems (previously referred to as Sumps and Wastewater Separators). This *Final Draft Supplemental Environmental Assessment* (SEA) is a supplement to the *Final Determination of No Significant Impacts*, which was certified by the South Coast Air Quality Management District's (AQMD's) Governing Board in November 1989.

The purpose of Rule 1176 is to further reduce VOC emissions from sumps, wastewater separators, separator forebays, process drains, sewer lines, junction boxes and manhole covers at refineries, oil production fields and chemical plants. The rule was originally adopted in 1989. VOC emission reductions from this source category were included in the overall emission reductions that the AQMD took credit for in the State Implementation Plan (SIP). Upon reevaluation, the emission inventory developed for Rule 1176 has been updated denoting a need for emission reduction. The current emission inventory indicates that by improving the rule's enforceability and placing emission limits on junction boxes and manhole covers, approximately 3.06 tons per day of VOC emissions can be reduced.

The proposed amendments have been developed to achieve the following: ensure that emission reductions from wastewater systems are being attained through better rule enforcement, further control of refinery process drains, clarify that bulk terminals are being removed from the rule's applicability, reduce excess emissions from junction boxes and manhole covers, refine the emissions inventory, amend the required test methods for process drains, and improve recordkeeping, inspection and maintenance requirements.

Total VOC emission reductions associated with the proposed amendments are approximately 3-96 2.96 tons per day. These emission reductions result from the control of process drains (approx. one ton), and the control of the junction box vents and manhole covers (approx. two tons per day). There will be slight emission increases; however, from the exemption of approximately 141 bulk terminals from the rule's requirements. The emission increases will be evaluated in the air quality impacts discussion found in Chapter 2.

While there are no specific control technologies mandated in the proposed amendments, it is possible that facilities may choose *one or more* any of the following options to comply with the proposed 500 parts per million (ppm) requirement in the rule: source reduction, water seals, hard piping, or venting to an air pollution control device such as carbon adsorption or flameless oxidation.

LEGISLATIVE AUTHORITY

The California Legislature created the South Coast AQMD in 1977¹ as the agency responsible for developing and enforcing air pollution control rules and regulations in the South Coast Air Basin (Basin). By statute, the AQMD is required to adopt an air quality management plan

¹ The Lewis-Prestley Air Quality Management Act, 1976 Cal. Stats., ch. 324 (codified at Health & Safety Code, Sections 40400-40540).

(AQMP) demonstrating compliance with all state and federal ambient air quality standards for the Basin.² Furthermore, the AQMD must adopt rules and regulations that carry out the AQMP.³ Rule 1176 - VOC Emissions from Wastewater Systems, is currently being amended pursuant to those mandates.

Environmental Impact Analysis

The proposed amendments to Rule 1176 - VOC Emissions from Wastewater Systems, are a "project" as defined by CEQA. The AQMD is the lead agency for the project and has prepared the appropriate environmental analysis pursuant to its certified regulatory program (California Public Resources Code Section 21080.5). California Public Resources Code Section 21080.5 allows public agencies with regulatory programs to prepare a plan or other written document in lieu of an environmental impact report once the Secretary of the Resources Agency has certified the regulatory program. The AQMD's regulatory program, Rule 110, was certified by the Secretary of the Resources Agency on March 1, 1989. Pursuant to Rule 110, the AQMD has prepared this Draft Supplemental Environmental Assessment (SEA) to a previously prepared CEQA document (Determination of No Significant Impacts) for Rule 1176.

CEQA requires that the potential environmental impacts of proposed projects be evaluated and that feasible methods to reduce or avoid adverse environmental impacts of these projects be identified. To fulfill the purpose and intent of CEQA, the AQMD has prepared this Draft Supplemental EA to address the potential environmental impacts associated with the proposed amendments to Rule 1176. Prior to making a decision on the proposed amendments, the AQMD Governing Board must review and certify the Supplemental EA as providing adequate information on the potential adverse environmental impacts of the amended rule.

PREPARATION OF A SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT

The AQMD's Certified Regulatory Program allows additional analysis to be added to a previously prepared and certified CEQA document if subsequent changes are proposed to the project which involve potential environmental impacts not previously considered. Where only minor additions or changes would be necessary to make the previous environmental analysis adequately apply to the project in the changed situation, a supplement to the previous document may be prepared. A supplemental CEQA document need only contain the information necessary to make the previous document adequate for the project as revised, and may be circulated by itself without recirculating the previous CEQA document.

The AQMD has evaluated the proposed amendments to Rule 1176 to determine if they raise new information of substantial importance relative to the 1989 CEQA document prepared for Rule 1176 - VOC Emissions from Wastewater Systems. Since only minor changes need to be made to the previous CEQA document to account for the proposed amendments, a supplement to the previously prepared CEQA document is the appropriate document. Consistent with CEQA, this Supplemental EA focuses solely on the proposed amendments to Rule 1176, and not on the entire rule as was done in the original CEQA document. Any environmental topics

² Health & Safety Code, Section 40460 (a).

³ Health & Safety Code, Section 40440 (a).

that were addressed in the previously prepared and certified CEQA document for Rule 1176 that are not affected by the proposed amendments will not be included in this SEA.

CEQA DOCUMENTATION FOR RULE 1176

AQMD rules, as ongoing regulatory programs, have the potential to be revised over time due to a variety of factors. Environmental analyses of subsequent amendments to AQMD rules or regulations are performed to supplement the original analysis. Consequently, as discussed below, a CEQA document has previously been prepared to analyze potential impacts from Rule 1176 - VOC Emissions from Wastewater Systems.

The two other documents which comprise the Final 1989 EA for Rule 1176, incorporated herein by reference, include the following: Notice of Intent to File a Determination of No Significant Environmental Impacts (September 1989) and Final Determination of No Significant Environmental Impacts (November 1989). A summary of the contents of these documents is given below. All documents comprising the 1989 EA for Rule 1176 were circulated for public review and were otherwise available at AQMD headquarters on the dates indicated below. These documents can still be obtained by contacting the AQMD's Public Information Center at (909) 396-3600. Due to the historic nature of the documents, they are available in hard copy only. Electronic versions of the Rule 1176 Board package will not include the 1989 Determination of No Significant Impacts.

Notice of Intent to File a Determination of No Significant Environmental Impacts: This Notice of Intent for Rule 1176 was released for public review and comment on September 20, 1989. The Notice contained a brief project description including information regarding emission reductions and rule requirements; applicable air pollution control technologies; an environmental checklist; and a discussion regarding potential environmental impacts. The goal of this Notice of Intent was to solicit information from the public and public agencies on the analysis prepared for the proposed project.

Final Determination of No Significant Impacts: The Final Determination of No Significant Impacts for Rule 1176 was certified by the AQMD's Governing Board on November 3, 1989. The document contained the same basic elements as the Notice of Intent but also included responses to comments received on the Notice of Intent. There were no environmental areas identified as being significantly adversely impacted by the proposed project.

EXISTING SETTING

The AQMD has jurisdiction over an area of approximately 12,000 square miles, consisting of the four-county South Coast Air Basin and the Los Angeles County portion of the Mojave Desert Air Basin (MDAB) (formerly the Southeast Desert Air Basin [SEDAB]) and the Riverside County portions of the Salton Sea Air Basin (SSAB) (formerly part of the SEDAB). The South Coast Air Basin, which is a subarea of the AQMD's jurisdiction, is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. It includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. The Los Angeles county portion of MDAB (known as North county or

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Antelope Valley) is bounded by the San Gabriel Mountains to the south and west, the Los Angeles/Kern county border to the north, and the Los Angeles/San Bernardino county border to the east. The Riverside county portion of the SSAB is bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley. The federal nonattainment area (known as the Coachella-San Jacinto Planning Area) is a subregion of the Riverside county area SSAB that is bounded by the San Jacinto Mountains to the west and the eastern boundary of the Coachella Valley to the east (Figure 1-1).

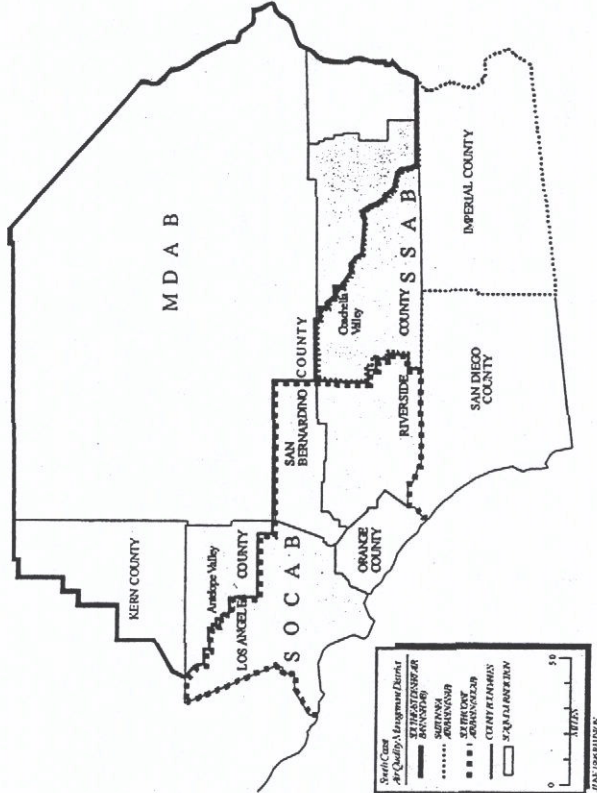


FIGURE 1-1
SOUTH COAST AIR BASIN

AIR QUALITY EXISTING SETTING

Over the last decade and a half, there has been significant improvement in air quality in the AQMD's jurisdiction. Nevertheless, some air quality standards are still exceeded frequently and by a wide margin. Of the National Ambient Air Quality Standards (NAAQS) established for six criteria pollutants (ozone, lead, sulfur dioxide, nitrogen dioxide, carbon monoxide, and fine particulate matter [PM10]), the South Coast Air Basin's jurisdiction is only in attainment with the state and national sulfur dioxide standards.

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The following paragraphs briefly summarize the status of air quality in the AQMD's jurisdiction with respect to monitored levels of the criteria pollutants.

Ozone, carbon monoxide (CO), and PM10 continue to be the area's most severe air pollution problems.

Unlike primary criteria pollutants that are emitted directly from an emission source, ozone is a secondary pollutant. It is formed in the atmosphere through a photochemical reaction of VOC, oxides of nitrogen (NOx), oxygen, and other hydrocarbon materials with sunlight. Locations within the AQMD's jurisdiction exceed the federal ozone standard far more frequently than any other areas in the United States. Ozone levels in the AQMD's jurisdiction exceeded the federal standard by the widest margin compared to other criteria pollutants, with a maximum concentration that was 217 percent of the standard. Ozone concentrations exceeded the state standard at all but one monitored locations.

CO is a colorless, odorless gas formed by the incomplete combustion of fuels. CO competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs in the body. The ambient air quality standard for carbon monoxide is intended to protect persons whose medical condition already compromises their circulatory system's ability to deliver oxygen. The CO standard was monitored at 22 locations in 1995. The federal and state 8-hour CO standards were exceeded at three locations. Source/Receptor Area No. 12, South Central Los Angeles County, reported by far the greatest number of the exceedances of the federal and state CO standards (13 and 15 days, respectively).

Nitrogen dioxide (NO₂) is a brownish gas that is formed in the atmosphere through a rapid reaction of the colorless gas nitric oxide (NO) with atmospheric oxygen. NO and NO₂ are collectively referred to as NO_x. Concentrations of NO₂ have declined substantially over the period 1976 to 1995. By 1991, exceedances of the federal standard were limited to one location in Los Angeles County which is the only area in the United States classified as nonattainment for the federal NO₂ standard. For the first time in 1992, and again in 1993, 1994, and 1995, no location within the AQMD exceeded the federal standard. 1994 was the first year that the state NO₂ standard was not exceeded. The state standard was also met in 1995. Despite declining NO_x emissions over the last decade, further NO_x emissions reductions are necessary because NO_x is a PM10 and ozone precursor.

PM10 is defined as suspended particulate matter 10 microns or less in diameter and includes a complex mixture of man-made and natural substances including sulfates, nitrates, metals, elemental carbon, sea salt, soil, organics and other materials. In 1995, the federal PM10 standards were exceeded at nine monitoring stations within the AQMD's jurisdiction, while the more stringent state PM10 standards were exceeded at all 19 monitoring stations which monitor PM10.

Sulfur dioxide (SO₂) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. SO₂ concentrations have been reduced to levels well below state and federal standards. Because SO₂ is a precursor to sulfate and PM10 formation, further reductions in emissions of SO₂ are needed to attain compliance with standards for these other pollutants.

Sulfates are a group of chemical compounds containing the sulfate group, which is a sulfur atom with four oxygen atoms attached. Though not exceeded in 1993, the state sulfate standard was exceeded at three locations in 1994 and one location in 1995. There are no federal standards for sulfate.

Lead concentrations once exceeded the state and federal standards by a wide margin, but have not exceeded state or federal standards at any regular monitoring station since 1982. Though special monitoring sites immediately downwind of lead sources recorded very localized violations of the state standard in 1994, no violations were recorded at these stations in 1995.

Since deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality, the state of California has adopted a standard for visibility (also called visual range). Until 1989, the standard was based on visibility estimates made by human observers. The standard was subsequently changed to require measurement of visual range using instruments that measure light scattering and absorption by suspended particles.

Visual range measurements were recorded at two locations in 1995. There were 109 days in 1995 which exceeded the state standard at the east San Gabriel Valley monitoring station (out of 312 days of data). The central San Bernardino Valley station recorded 50 days exceeding the state standard in 1995 (out of 116 days of data).

PROJECT DESCRIPTION

Purpose

The purpose of existing Rule 1176 is to reduce VOC emissions from sumps, wastewater separators, separator forebays, process drains, sewer lines, junction boxes and manhole covers located at oil production fields, refineries, chemical plants and industrial facilities. Amendments are proposed to improve rule enforceability and achieve emission reductions from junction boxes and manhole covers. Since the rule's adoption in 1989, the emissions inventory has been revised to more accurately reflect emissions from drains. This amendment process incorporates these changes along with changes to the test method used to determine a violation of the rule. The addition of a 500 ppm limit for junction boxes and manhole covers will also achieve emission reductions of over 2 tons per day.

Background of Existing Rule

Facilities such as refineries, oil production fields, chemical plants, and industrial facilities handling petroleum liquids generally have many different drains and drain system components on site that receive organic-containing liquids from their production. VOC emissions are

generated whenever the surface of a liquid containing VOCs is exposed to the atmosphere. These emissions are generally a function of the VOC content in the liquid, material temperature and vapor pressure, exposed area for evaporation, ambient temperature and wind conditions. The process drain system, which includes the drain, junction boxes, manhole covers, sumps, etc., that make up the wastewater system can all contribute to VOC emissions to a large extent from the point of entry of liquid into the drains until the liquid enters wastewater separators.

Current Rule 1176 established limits for the VOC content of the drain system at such facilities as refineries, oil production fields, chemical plants and industrial facilities. The rule mandates that facilities not exceed a 500 ppm standard at the drain openings or any location that would vent to the atmosphere. In addition, all junction boxes and manholes are required to be covered as well as secondary sumps, tertiary sumps or wastewater separators. Recordkeeping requirements were included as well as specifications for appropriate covers and seals.

Proposed Changes to Rule 1176

The proposed project would strengthen the inspection and maintenance (I/M) requirements as well as the enforceability of the rule to assure that targeted emission reductions are in fact being achieved. The amendments will also reduce VOC emissions from junction box vents and manhole covers, which will result in achieving approximately two tons of emission reductions per day. The emission reductions associated with the proposed amendments are based on a revised emissions inventory for process drains, junction box vents and manhole covers that was not available at the time of the rule's original adoption in 1989.

The proposed amendments will:

- Establish a limit of 500 ppm VOCs for junction box vents and manhole covers.
- Require operators to identify or submit a schematic drawing of the wastewater system and air pollution control devices for inspection, monitoring, repair, replacement and recordkeeping purposes.
- Require process drains installed after the adoption of the proposed amendments to be equipped with water seal controls or other control methods approved by the Executive Officer.
- Include new options for air pollution control (APC) devices, excluding water seals, that will allow facilities to measure using a grab sample or method 21 for excess emissions or other process parameters to determine compliance.
- Require refineries to either control all "problem" drains as defined in the ~~upon adoption of the proposed amendments or gradually control all drains~~ rule using historical data collected with in the last 12 months, or conduct monitoring prior to implementation of the rule amendment or gradually control all drains. Refineries will choose their compliance option and submit a written compliance plan to the AQMD.
- Require repair or replacement of drain system components (DSC) found in violation and require the replaced or repaired component to be reinspected.

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~~Establish inspection and monitoring frequency. Require inspections to be performed by a certified inspector. Changes in recordkeeping provisions are also proposed.~~

- Allows for EPA Reference Method 21 or Method 25 to be replaced with any other approved method demonstrated by the applicant to be equivalent.
- Bulk terminals which handle diesel, gasoline and other distillates will be excluded from the rule's requirement. Approximately 141 bulk terminals will now be excluded from the rule's requirements.

Other New Rule Amendment Modifications

The following rule amendments were incorporated after the release of the Draft Supplemental EA. These new provisions have been evaluated for potential CEQA implications and found to have no adverse environmental impacts that would change any of the findings made in the Draft Supplemental EA and as a result, required insignification modifications to the SEA.

- *Refinery: Allow semi-annual monitoring of controlled DSCs and junction box vents, quarterly monitoring of DSCs below 500 ppm and quarterly or semiannually monitoring of good performance DSCs.*
- *Other: Include an exemption from some monitoring requirements for natural gas handling facilities which are operated to receive and store natural gas, such as gas sold or distributed by any utility company.*
- *Any Other: Inaccessible drains as defined in Rule 1176 will be monitored annually.*

CONTROL TECHNOLOGY

There are three categories of controls that can be used to comply with the proposed amendments to Rule 1176: work practices such as source reduction and improved inspection and maintenance practices (I/M) and improved sampling; elimination of emissions at the emission point through water seals, capping, plugging, hard piping; or venting to an air pollution control device such as carbon adsorption, or an oxidation device. These technologies will be discussed in the following paragraphs.

Enclosing by Direct Piping (Hardpiping)

This control option is the most effective control option and would result in the greatest emission reductions. Complete drainage system enclosure can be accomplished in the following manner:

- Hard pipe process units to the wastewater separator and then remove or cap all existing process drains.
- Hard-pipe process units to a drain box enclosure.

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- Hard-pipe those process units identified as the largest contributors to process drain emissions.
- Hard-pipe junction boxes that are completely covered and sealed with no operations. This is done at some refineries, however, there may be some concern with vapor lock or siphoning.

This method is considered to have up to 100 percent control efficiency. However, the safety issues and reconstruction complexity may be two prohibiting factors that reduce the likelihood of converting an existing open drainage system to a totally enclosed system.

Equipping the Drains and Vents with Water Seal Controls

This would control emissions from the downstream sewer lines from escaping back out of the drain or vent opening. Even with water seals installed in drains, emissions have been reported from VOC containing liquid left standing in the water seal, that was not flushed into the sewer line. Also, if the water is allowed to evaporate from the water seal controls, the emissions from the drain or vent would be similar to those from uncontrolled units. Below are two types of water seal configurations:

- P-leg seal configuration (similar to kitchen sink drain).
- Liquid seal inserts that can be placed in existing process drains and junction box vents.
- The overall control efficiency of this method is estimated at an average of 65 percent and varies depending on maintenance.

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Inspection and Maintenance

- Turnarounds would require plugging of associated drains and diversion of VOC contains liquid either to tanks, vacuum trucks, or oil/water separators.
- More frequent inspections and repairs of problem drains could reduce emissions. During sewer line cleanouts, all drains could be capped or plugged.
- An inspection and maintenance program could be used to prevent contaminated liquid from getting into the drain system.

Closed Loop Sampling

This technique prevents the loss of VOC liquid during product sampling and has been required for certain applications under the federal New Source Performance Standards.

Sealing of Manhole Covers

- Pick holes may be plugged with neoprene, wood, or caulk.
- Placing a gasket underneath a manhole cover will reduce emissions.

Although information is limited, this method is assumed to have an average of 65 percent overall control efficiency similar to the water seals.

Source Reduction through Diversion of VOC Contaminated Wastewater from the Drain System

The principal strategy is to handle the wastewater so that it does not enter the drain system. One refinery has reported that wastewater from tank draws is diverted to vacuum tank trucks rather than into the drains system. The wastewater is then reintegrated into the process stream. Other refineries have hardpiped tank draws directly, eliminating VOC contaminated liquid from the open drain system. The control efficiency would vary depending on the methodology of the source reduction.

Collecting and Venting the Emissions to a Control Devices

- Process drains and junction box vent emissions could be collected and directed to a control device such as a carbon adsorber, a flare system, a condensation unit, a flameless incineration unit or a catalytic oxidation unit.
- A portable canister with active vapor collection going to a carbon adsorption system could be used for small unit turnaround, spills and general cleanup to keep contaminated water out of the drain system.

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These control devices can achieve a minimum of 95 percent control efficiency, and allow for ventilation in the wastewater system.

Carbon Adsorption

The previously proposed CEQA document for Rule 1176 certified in 1989 identified several impact areas that may result from the use of carbon adsorption. The impacts areas included the following: air quality, water quality, public services, energy and solid waste. In all cases, the impacts were determined to be insignificant prior to mitigation. There are no provisions in the currently proposed amendments that would alter this determination relative to this control technology. Therefore, an additional analysis of carbon adsorption will not be performed. Please refer to the Negative Declaration certified for Rule 1176 in 1989 for a complete discussion of this technology and its potential impacts.

Oxidation

Oxidation is the process of converting VOC gases to carbon dioxide and water through combustion. Three basic types of oxidizers are thermal, catalytic and flameless. The control efficiency associated with each of these types of oxidation devices is approximately 95 percent. These strategies will be evaluated in Chapter 2.

Flameless Thermal Oxidation (FTO)

The FTO is a relatively new technology able to handle small streams with variable VOC contents. This technology represents a cost-effective option for areas with a high positive flow where other technologies are not feasible.

In the FTO system, the VOC waste stream is mixed with air prior to entering the flameless thermal oxidizer. A gas distribution plenum then evenly directs the vapor stream into an inert ceramic bed or "matrix." The bed provides thorough mixing of oxygen with the fume. Upon reaching the optimal oxidation temperature, the hydrocarbons react to form carbon dioxide and water. The heat released by the reaction is absorbed by the ceramic matrix which acts as a heat sink. Air emissions from the system are innocuous.

All of the waste stream passes through the reaction zone. The well-mixed stream heats up to the optimal oxidation temperature in the reaction zone which is designed to operate at 1600° F. Ample residence time enables the hydrocarbons to oxidize completely. The large thermal mass of the matrix absorbs the heat released during oxidation preventing flames or flashback... at least one manufacturer of FTOs guarantees up to 99.99 percent destruction of the organics with negligible by-product formation.

Monitors and microprocessor controls keep the system operating smoothly. The system maintains its stability even for fluctuating flow rates and organic concentrations. If the flow or concentration increases substantially, dilution air is added to keep the reactor within the proper operating temperature.

An FTO has never been used on junction boxes or manhole covers in the South Coast Air Basin. It is currently being used, however, at refineries in northern California to control fugitive emissions from pumps. Upon thorough analysis, AQMD staff believes that this

technology could be applied to handle VOC emissions from junction boxes and manhole covers with high positive flow that cannot use a water seal or cover as a compliance option. Although the manufacturer of this technology guarantees a 99.99 percent control efficiency, the AQMD is conservatively estimating a 95 percent control efficiency from FTOs.

EMISSION REDUCTIONS

The improved emission inventory, control of excess emissions from junction boxes and manhole covers, improved inspection and maintenance and better rule enforceability will achieve emission reductions of approximately 3.06 tons per day. An emission increase will be experienced, however, from the removal of the bulk terminals from the rule's requirements. The increased associated with bulk terminals is approximately 200 pounds of VOC per day. The proposed amendments are, therefore, expected to achieve a net emission reduction of 2.96 tons per day.

Revised Emissions Inventory

Rule 1176 applies to refineries, chemical plants, oil production fields and industrial facilities in the South Coast Air Basin (Basin).

The 1989 Staff Report for Rule 1176 estimated drain emissions to be approximately one ton per day since there was no emission inventory available. A recent review of data has indicated, however, that VOC emissions at refineries were closer to 4.7 tons per day in 1989. Therefore, emission reductions from the existing rule were much higher than the amount of credit that was taken.

Table 1 highlights the fugitive drain emission inventory, beginning in 1992 and estimated through the end of 2000. An emission reduction of 42.5 percent exists between the years 1993 and 1994 due to the reduced number of refineries, and because two refineries chose to meet Benzene National Emission Standards for Hazardous Air Pollutants (NESHAPS) by sealing their drain systems and applying process controls. Table 1 shows that the 1994 VOC emission inventory for fugitive drains is 2.3 tons per day. The 39 percent reduction proposed (0.9 ton per day) would not be achievable without better enforcement of the rule and further reductions from process drains.

TABLE 1
RULE 1176 - FUGITIVE DRAIN EMISSION DATA

	No. of Drains	Emissions (tons/day) ²
1990	11,149	7.3
1991	15,101	7.5
1992	16,420	3.7
1993	18,422	3.1
1994	18,292	2.3

² The drain emissions for 1990-1992 were adjusted for an improved inventory of the total number of drains. The total number of drains for estimating emissions is based on the assumption that drains are a physical structure and the number should remain relatively constant from year to year unless there is an alteration or modification to a facility.

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CHAPTER 2

ENVIRONMENTAL CHECKLIST

Introduction
General Information
Potentially Significant Impact Areas
Determination
Environmental Checklist and Discussion

INTRODUCTION

The environmental checklist provides a standard evaluation tool to identify a project's adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by the proposed project.

GENERAL INFORMATION

Name of Proponent: South Coast Air Quality Management District
 Address of Proponent: 21865 E. Copley Drive
 Diamond Bar, CA 91765
 Lead Agency: South Coast Air Quality Management District
 Contact Person: Tara Sheehy-Tisopulos (909) 396-3102
 Name of Project: Proposed Rule 1176 - VOC Emissions from Wastewater Systems

POTENTIALLY SIGNIFICANT IMPACT AREAS

The following environmental impact areas have been assessed to determine their potential to be affected by the proposed project. As indicated by the checklist on the following pages, environmental topics marked with an "✓" may be adversely affected by the proposed project. An explanation relative to the determination of impacts can be found following the checklist for each area.

☐ Land Use and Planning	☐ Transp./Circ.	☒ Public Services
☐ Pop./Housing	☐ Biological Resources	☒ Solid Waste/Hazardous Waste
☐ Geophysical	☒ Energy/Mineral Resources	☐ Aesthetics
☒ Water	☒ Hazards	☐ Cultural Resources
☒ Air Quality	☐ Noise	☐ Recreation
		☒ Mandatory Findings

DETERMINATION

On the basis of this initial evaluation:

- ☒ I find the proposed project, in accordance with those findings made pursuant to CEQA Guideline Section 15252, could NOT have a significant effect on the environment, and that an ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will NOT be significant effects in this case because the mitigation measures described on an attached sheet have been added to the project. An ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- ☐ I find that the project MAY have a significant effect(s) on the environment, and an ENVIRONMENTAL ASSESSMENT will be prepared.

Date: June 10, 1996

Signature: _____

Steve Smith

Steve Smith, Ph.D.
Program Supervisor