



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

# PUBLIC WORKSHOP NOTICE

August 12, 2005

TO: INTERESTED PARTIES  
FROM: EXECUTIVE OFFICER / APCO  
SUBJECT: **DRAFT AMENDMENTS TO REGULATION 8, RULE 28:  
EPISODIC RELEASES FROM PRESSURE RELIEF DEVICES  
AT PETROLEUM REFINERIES AND CHEMICAL PLANTS**



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The staff of the Bay Area Air Quality Management District will conduct a public workshop to discuss draft amendments to Regulation 8, Rule 28, Episodic Releases from Pressure Relief Devices at Petroleum Refineries and Chemical Plants. The meeting will be held from **6:00 pm to 8:00 pm** on the date and at the location shown below:

**Wednesday, September 14, 2005**

Rodeo Senior Center  
189 Parker Avenue (at 3<sup>rd</sup> Street)  
Rodeo, California 94572

## **BACKGROUND:**

District Regulation 8, Rule 28, governs Pressure Relief Devices (“PRDs”) at petroleum refineries and chemical plants. PRDs are safety devices used on pressure vessels and other equipment operated at high pressures. The devices are used to safely vent gases from the equipment in order to relieve excessive pressure before it can build up and cause equipment failure or other safety hazards. When a PRD vents gases to relieve pressure, it can emit volatile organic compounds and/or other air pollutants.

Regulation 8, Rule 28 as currently written requires that all petroleum refineries and chemical plants report to the District any release from a PRD of over 10 pounds of any air pollutant. At petroleum refineries, any such release requires that the refinery install a “telltale indicator” on all PRDs on the affected equipment that will provide a clear indication of any further releases. Should any of these PRDs experience another release within five years, all of the PRDs on the affected equipment must be piped to an emissions control device, such as vapor recovery equipment or a safety flare.

The District has reviewed the current version of Regulation 8, Rule 28, and has identified several areas where there is room for improvement. First, although all affected facilities must report releases to the District, many do not have sufficient capability to detect all reportable releases, or to determine how large

a particular release was and what type of material it involved. Similarly, the current rule does not contain any recording or recordkeeping requirements, making it difficult to evaluate releases after the fact. As a result, release reporting may not be as comprehensive as was anticipated when the current rule was adopted. Second, some language in the current rule is confusing or outdated, and needs to be updated and clarified to make it more workable for affected facilities and for District enforcement staff.

Staff intends to propose amendments to the current rule to address these areas. The proposed amendments would:

- Require facilities to demonstrate the ability to detect and quantify Release Events (10 pounds of pollutants),
- Require data recording and recordkeeping requirements for venting and emissions verification;
- Add a definition for a term in lieu of “source” to ensure the rule applies to individual process components and related PRDs;
- Require “tell-tale indicators” or the equivalent for all atmospheric PRDs, and add a definition of “telltale indicator”; and
- Make minor changes to the rules such as deletion of the obsolete reference to turnaround (all equipment subject to this rule have been through at least one turnaround since 1998, triggering the requirements in the rule), moving requirements where appropriate and clarifying various sections of the rule.

For copies of the draft rule, draft staff report, or for questions or comments, please visit the District website at <http://www.baaqmd.gov/pln/ruledev/workshops.htm> or contact Victor Douglas, Senior Air Quality Engineer, at (415) 749-4752 or email [vdouglas@baaqmd.gov](mailto:vdouglas@baaqmd.gov).

## **DIRECTIONS**

Rodeo Senior Center  
189 Parker Avenue (at 3<sup>rd</sup> Street)  
Rodeo, California 94572

### **From Richmond, Berkeley and Oakland:**

Take I-80 East toward Vallejo / Sacramento  
Take the Willow Avenue Exit to Rodeo, Go 0.2 miles  
Turn Right at Willow Avenue, Go 0.5 miles  
Willow Avenue becomes Parker Avenue (heading north)  
Continue on Parker Avenue, Go 0.6 miles

### **From Benicia and Vallejo:**

Take I-80 West across Carquinez Straits Bridge toward Oakland / San Francisco  
Take the Willow Avenue Exit to Rodeo, Go 0.3 miles  
Turn Right at Willow Avenue, Go 0.3 miles  
Willow Avenue becomes Parker Avenue (heading north)  
Continue on Parker Avenue, Go 0.6 miles

### **From Martinez and Concord:**

Take CA-Hwy 4 West Toward Richmond / Rodeo  
Take the Willow Avenue Exit to Rodeo, Go 0.2 miles  
Turn Right at Willow Avenue, Go 1.0 mile  
Willow Avenue becomes Parker Avenue (heading north)  
Continue on Parker Avenue, Go 0.6 miles