



This Advisory is provided to inform you about activities of the Air 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: PETROLEUM REFINERIES AND CHEMICAL PLANTS

SUBJECT: NEW REPORTING AND DEMONSTRATION REQUIREMENTS FOR REGULATION 8, RULE 28 (REG. 8-28), ATMOSPHERIC PRESSURE RELIEF DEVICES (PRD)

Effective June 1, 2007: Reg. 8-28-503 requires that each facility shall monitor all atmospheric PRDs using a Monitoring System that meets the following requirements:

- Detect any release from a PRD greater than 10 pounds of emissions and notify operators that the release occurred;
- Determine date, time and duration of the release, and type and amount of material released;
- Insure that all elements of the system are functioning properly by checking the components of the system at least once per day. Such mechanisms may include equipment inspections, instrument calibrations or other means to ensure that systems are operating properly.

Effective June 1, 2007: Reg. 8-28-406 requires that each facility submit to the Air District a Monitoring System Demonstration Report that demonstrates that each atmospheric PRD is monitored by a monitoring system that satisfies the requirements of 8-28-503. The Report shall include descriptions of the following:

- *Each PRD* within the system, including the nominal set pressure for each device, and the range of pressures over which each device could reasonably be expected to release;
- *Monitoring system* for each PRD, including a narrative description and diagrams, or charts that clearly identify all elements of system and how they operate to monitor releases;
- *Operating parameters* that are directly monitored by the system (e.g. temperature, pressure, flowrates, etc.) with a description of:
 - Sensitivity and accuracy of the device(s) monitoring each parameter and the frequency with which each parameter is monitored, and how the sensitivity and frequency of monitoring is sufficient to allow the Monitoring system to detect releases of 10 pounds of emissions;
 - Calculations that are used to derive Release Event emissions information, (including any assumptions and the basis for those assumptions);
- *Alarms* or other indication that the system provides to alert operators that a Release Event has or may have occurred;
- *How* the information obtained is recorded and maintained.


The Monitoring System Demonstration Report shall be sent directly to the Air District at the address listed below, ATTN: **MAIL STOP: REPORTS.**

Effective July 1, 2007: The alternative compliance option in Reg. 8-28-405.2 expires. After this date, facilities must implement a least three redundant Prevention Measures defined in Reg. 8-28-211 for all organic compound PRDs.

If you have any further needs, contact the Air District as indicated below:

 For questions about this Advisory, contact Mike Wall, Air Quality Specialist, at (415) 749-4903 or mwall@baaqmd.gov

 For a copy of Reg. 8-28, see: <http://www.baaqmd.gov/dst/regulations/index.htm>

 For Compliance Assistance, call (415) 749-4999, the Compliance Counselor Hotline.

Kelly J. Wee
Director of Compliance and Enforcement