



Compliance Advisory September 9, 2013 Equipment Leaks

This Advisory is to inform you about activities that may affect your operation and is intended to assist you in your effort to achieve and maintain compliance with applicable air pollution regulations and rules.

ATTENTION: PETROLEUM REFINERIES, CHEMICAL AND BULK PLANT AND BULK TERMINALS

SUBJECT: CLARIFICATION OF APPLICABILITY OF STANDARDS FOR ASSEMBLIES WITH MORE THAN ONE PART SUBJECT TO A STANDARD; CLARIFICATION OF LEAK MINIMIZATION REQUIREMENTS

Applicable Standards:

In some cases, a connection subject to District Regulation 8 Rule 18 Equipment Leaks may be part of a multipart equipment assembly that is itself "equipment" subject to the rule. Examples include bonnet flanges on valves and connections on pumps.

In enforcing Regulation 8, Rule 18, the Air District will treat any static connection of components on equipment as a connection subject to section 8-18-304.

- Static connections (e.g., bonnet flanges) on equipment should be inspected as required by section 8-18-304, and these connections can only be considered non-repairable equipment pursuant to section 8-18-306.3.
- Components with moving parts such as valves, pumps, compressors, and pressure relief devices are subject to sections 8-18-302, 303 and 305.

Leak Minimization / Repair for All Equipment:

Any leak over an applicable standard may be brought into compliance by repair within 24 hours. If the leak is discovered by the operator and not repaired within 24 hours, it must be minimized within the first 24 hours following leak discovery using best modern practices to reduce the leak to the lowest achievable level, regardless whether the leak is ultimately repaired within the allowed 7 days or placed on the non-repairable equipment list. Failure to do so means the leak will be treated as a violation.

Leak minimization includes tightening bolts, replacing bolts, tightening packing gland nuts, and injecting lubricant into packing. If the first attempt at leak minimization does not reduce the leak below the regulatory limit, then other feasible methods, such as "drill and tap," should be used to repair the leak before recording the equipment as non-repairable.

Note that, although section 8-18-306 inadvertently omits a cross reference to section 8-18-304, section 306 allows connections to be treated as non-repairable equipment provided the leak concentration is less than 10,001 ppm, and provided the leak minimization requirements are met.

More Information can be obtained from the following sources:

- ☎ For questions regarding this advisory, contact Ed Giacometti, Air Quality Specialist, at (415) 749-8414 - or egiacometti@baaqmd.gov
- ☎ For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline
- ☎ For a copy of the above listed rule see www.baaqmd.gov/dst/regulations/#reg8

Wayne Kino
Director of Compliance and Enforcement