

EPA Inspection Activity in 2016 at the Torrance Refinery

- ▶ In 2016 EPA conducted compliance inspections at the Torrance Refinery with state and local partners:
 - **October 26–28**: CAA inspection with the SCAQMD
 - **November 1–4**: ‘Prevention of Accidental Chemical Releases’ – CAA §112(r) and CalARP with Torrance FD and SCAQMD
 - **November 28**: Inspection of the TRC wastewater treatment plant with the SCAQMD
 - **December 8**: RCRA Subtitle C inspection with the California Department of Toxic Substances Control
- ▶ **An inspection is often EPA’s first step in a multi-step process to bring facilities into compliance with federal law**

Programs Included in the Inspections

- ▶ **Prevention of Accidental Releases – CAA §112(r)**
 - Reduce chemical risks at the local level
 - Prevent catastrophic releases of toxic, reactive, flammable or explosive chemicals
- ▶ **Resource Conservation and Recovery Act**
 - Protect against the hazards of waste disposal, reduce the amount of waste generated and ensure that wastes are managed safely
- ▶ **Clean Air Act – NESHAPs**
 - Establish standards, notification, emissions testing, monitoring, recordkeeping and reporting requirements for hazardous air pollutants such as fugitive emissions, mercury, asbestos and benzene.

EPA Inspection: Alkylation Unit – **Preliminary** Findings

- ▶ TRC's toxic worst case scenario modelling of off-site impacts does not appear to meet regulatory requirements;
- ▶ TRC did not conduct a second flammable worst case scenario for railcars;
- ▶ TRC did not follow internal policies on operating procedures;

EPA Inspection: Alkylation Unit – Preliminary Findings

- ▶ TRC's operating procedures appear to be deficient in several areas;
- ▶ TRC appears to be operating without the use or beyond the applicable use of safeguards;
- ▶ TRC did not correct deficiencies in equipment in a safe and timely manner.

EPA Inspection: Assessment of RCRA Hazardous Waste

Preliminary Observations

329 bins of RCRA listed hazardous wastes on site for more than 1 year.

Storage of emulsified layer material skimmed off of the API separator (RCRA K049 hazardous waste) in two on-site tanks without a permit.

Storage of float from the gas flotation unit (RCRA K048 hazardous waste) in an in-ground concrete pit without a permit.

Management of heat exchanger bundle cleaning sludge (RCRA K050 hazardous waste) on a concrete pad without a permit.

Compliance Process

- ▶ Field Inspection
- ▶ Inspection Report/Notify Facility of Findings
- ▶ Facility Response to Notice of Findings
- ▶ Finalization of Deficiency Assessment and Enforcement Determination
- ▶ If Enforcement Action is taken, several options are available:
 - Administrative Settlement for Injunctive Relief
 - Administrative Penalty Action
 - Expedited Settlement Agreement
 - Judicial Referral – normally includes IR and a penalty

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