

## General Instructions and Guidelines for completing FORM 1, FORM 2 and FORM 3

### **FORM 1 – Survey: Affected Facilities**

(1) Who should complete this form?

This survey form should be completed by affected facilities which include refineries, bulk plants, bulk and marine terminals and organic pipeline facilities.

(2) Which vacuum truck transfer activities should be included in this form?

This form should be used to report vacuum truck activities that involve vacuum trucks that are owned by the operator of the affected facilities outlined in the rule.

(3) For what period of time should the data reported in Form 1 be collected?

The period of time over which vacuum truck activity data is collected could be of the order of a few weeks if the operator determines that this period is a representative sample size of the typical annual vacuum truck operation for a facility. The time period should be identified in the Header section. The SCAQMD will in turn extrapolate the data collected during this time period to estimate the annual throughput of materials transferred, in addition to other information requested in the form.

(4) In Column F what information is required? – *“Discharge (On-site/Off-site)”*

Column F asks whether the material that has been transferred to the vacuum truck (at the affected facility) is discharged, either **“Onsite”** or **“Offsite”**.

(5) In Column I – *“Indicate if Positive Displacement Pump Used”*

In Column J – *“Indicate if Gravity Feed Method Used”*

A simple Yes (Y) or No (N) response is required in each case depending on the operating condition.

(6) In Column K – *“Control Equipment Used (Y/N/Varies – Describe)”*

If the material transferred uses a specific control equipment at all times, please indicate **“Y”** for Yes. If the material transferred is not expected to ever require any type of control, please indicate **“N”** for No. However, if the material transferred does require the use of control equipment in some cases, but not in others, please indicate **“Varies”** and provide an attachment with an explanation.

## **FORM 2 – Truck Operator Survey**

(1) Who should complete this form?

This survey form should be completed by vacuum truck operators whom owners/operators of affected facilities have contracted to conduct the transfer of “regulated” organic material.

For each affected facility that a truck operator has entered into a contract with, the truck operator is required to provide an entry with all the necessary data and information that is requested in each column.

(2) Who is responsible for completing the Skid-Mounted Control Equipment Inventory information?

Where the control equipment used during the material transfer process belongs to another contractor or the affected facility, the vacuum truck operator is responsible for obtaining the control equipment data and information required to complete the Skid-Mounted Control Equipment Inventory section of FORM 2.

## **FORM 3 – Vacuum Truck Information Request**

(1) Who should complete this form?

This survey form should be completed by the owner/operator of affected facilities where vacuum trucks are used to transfer “regulated” organic material.

(2) Questions #2 (of FORM 3): *Please briefly describe the general process for conducting a typical vacuum truck job, including pre-work safety and hazard assessment, monitoring or oversight during operation, number of operators and each operator’s role, duties or tasks, any implications involving the truck and any control equipment during start-up, operations or shut down, and any records, logs or reports currently maintained that are associated with emission generating or nuisance potential (such as the records of the amount and type of material handled, the length of a job and any maintenance or repair efforts associated with the job).*

This question does **not** require responses to include extensive information. Rather, the question only requires a response with highlights that include:

- Any pre-work safety activities, such as description or categorization of the type of assessments used for hazards, visual inspections conducted, any guidelines provided

to the vacuum truck operator regarding where loads are picked up from and where they will be disposed of

- Factors that may determine the positioning of the vacuum truck operator (s) during transfers and the use of special proper personal equipment (PPE) where necessary
- Precautions taken during (equipment) disconnection following the transfer of material
- Description of safety practices involved during the offloading/disposal of material stored in vacuum trucks

(3) Question #3(of FORM 3): *Please provide, describe or identify any checklists, procedures or other criteria currently used to manage or control vacuum truck operations to minimize emissions or nuisance potential.*

*Identify or describe any limitations on the use of control equipment relative to safety, physical constraints (footprint, proximity to fence line or other sensitive areas or operations), scheduling or other operational logistics or other considerations, including cost.*

In several cases the owner/operator contracts out transfer activities that involve the use of control equipment. In these cases the owner/operator is expected to coordinate with the contractor in order to provide a response to this question.

This response requires information that would indicate owners/operators of control equipment possessing any type of checklists, procedures, criteria or “rules of thumb” relative to flow rates, concentration or any other variables used as guidelines in making decisions on how materials are transferred or how control equipment is selected. A control equipment contractor may also cross-reference a facility’s procedures provided that facility is identified.

(4) Question #4 (of FORM 3): *If vacuum truck operations are conducted in-house by facility owner/operator, please provide, describe or identify any checklists, procedures or other criteria currently used to manage or control vacuum truck operations to minimize emissions or nuisance potential if they are different from the ones referenced in Question #3.*

This question is similar to Question #3, except that it is applicable to vacuum truck operations that are conducted in-house by the facility owner/operator and not the contractor.

(5) Question #7(of FORM 3): *Describe vacuum truck cleaning procedures, including who conducts the cleaning, the frequency of cleaning, where the cleaning takes place and information relative to the disposition of the rinsate materials.*

The rule development process includes an evaluation of environmental impacts pursuant to the California Environmental Quality Act (CEQA) and this information supports evaluation of these impacts.

- (6) Would the SCAQMD consider providing an exemption based on individual volume transfers that are two (2) barrels or less?

Question #7 has been added to FORM3 to obtain data regarding the percentage of transfers that fall into the (2 barrel) low-volume category, in addition to overall volumes of material associated with these transfers. This information will be evaluated to determine the appropriateness of an exemption.