

Summary of Current and Proposed Rule Amendments :



**Gasoline Distribution Bulk Terminals, Bulk Plants
and Pipeline Facilities;**
(40 CFR 63, subpart BBBBBB)

&

Gasoline Dispensing Facilities (GDF)
(40 CFR 63, subpart CCCCCC)



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Summary of Current Rules

- National Emission Standards for Hazardous Air Pollutants (NESHAP)

National rules in all areas (not just in urban or criteria pollutant non-attainment areas)

- Only sources located at “Area Sources” are affected by these rules (emits less than 10 tons per year of any HAP or less than 25 tons per year of any combination)

- Many state, local, and tribal agencies have control regulations in place,

- Those rules remain in effect, as well as, these new standards must be implemented.
- Current control systems meeting certain criteria may already be in compliance with this rule

Summary of Current Rules (cont)

■ Affected sources:



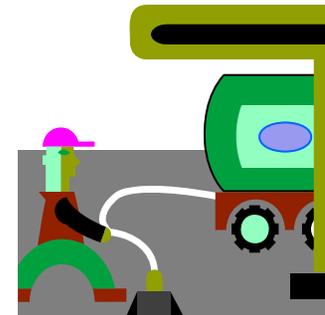
□ Bulk Type Facilities:

- Bulk Gasoline Terminals (Terminals)
- Bulk Gasoline Plants (Plants)
- Pipeline Facilities (Pipelines)



□ Gasoline Dispensing Facilities (GDF)

- Truck unloading gasoline into storage tanks
- NOT: Vehicle refueling equipment



□ Products

- Gasoline and gasoline-alcohol blends (E10 and E85)
- NOT: fuel oil, jet fuel, nor diesel

Summary of Current Rules (cont)

■ Emission Controls:

□ Storage Tanks

■ Terminals and Pipeline:

- Large Tanks – Install Floating Roofs With Specific Rim Seals
- Small Tanks – Covers



■ Plants and Medium GDF – Submerged Fill

■ Large GDF - Vapor Balancing & Submerged Fill



□ Cargo tank (tank truck & rail car)

■ Plants and small Terminals – Submerged Fill Loading

■ Larger Terminals – Vapor Processing (outlet limit of ≤ 80 milligrams per liter loaded)

■ Larger Terminals and Large GDF

- Annual Method 27 testing for vapor tightness of cargo tanks
- Proper equipment and hook up of vapor collection/balance equipment

□ Leak Detection & Repair

■ All GDF - General housekeeping

(minimize spills, clean up expeditiously, cover containers, etc)

■ All others – Monthly inspection (sight, sound, smell)



Summary of Current Rules (cont)

■ Control Compliance Dates

□ **New sources:** (constructed or reconstructed sources since November 9, 2006)

- January 10, 2008, or upon startup if startup occurs after January 10, 2008, unless
- GDF complying with Table 1 Vapor Balance Management Practices – compliance date is September 23, 2008, or upon startup if startup occurs after September 23, 2008,

□ **Existing Sources:** January 10, 2011

Proposed Amendments:

- **Proposed: December 15, 2009 in the Federal Register**
- **Comments must be received on or before February 16, 2010, see notice for how to submit comments.**
- **About 30 Amendments and Clarifications – see listing on next slide**
- **Today's presentation focus: most requested to be clarified or discussed**
 - **Definition of Gasoline Dispensing Facility (GDF)**
 - **Throughput Thresholds**
 - **Once Over A Throughput Threshold**
 - **Monthly Throughput Definitions**
 - **Periodic Compliance Testing for GDF vapor balance systems**
 - **Who is required to test**
 - **Timing of tests for existing vapor balance systems**
 - **Definition of Gasoline**

Listing of All Proposed Amendments:

A. Applicability

1. Definition of Bulk Gasoline Plant
2. Definition of Gasoline Dispensing Facility (GDF)
3. Storage Tanks:
 - Infrequently Used
 - Surge Control Tanks
 - Definition of Storage Tanks
 - Temporary/Contractor Tanks
 - Tanks used to Fuel Vehicles and to Fill Cargo Tanks for On-Site Fuel Distribution
4. Aviation Gasoline at Airports and Marine Tank Vessel Loading
5. Overlap with Chemical Manufacturing Area Source (subpart VVVVVV)

B. Throughput Thresholds

1. Once Over A Throughput Threshold
2. Monthly Throughput Definitions
3. Start of Throughput Records
4. Multiple Tanks and GDF at a Plant Site

C. Rule Clarifications

1. Recordkeeping for Continuous Compliance Monitoring
2. Submerged Fill Drop Tube Measurements and Alternatives
3. Continuous Compliance Monitoring for All Vapor Processors
4. Secondary Rim Seal Requirements Specified Under Subpart WW
5. Monitoring of Submerged Fill Loading Racks
6. Initial Notifications
7. Notifications of Compliance Status
8. BGT & PF Storage Tank Inspections
9. General Provisions Applicability
10. Compliance Testing for GDF
11. Definition of Gasoline
12. Requirements for New GDF Storage Tanks
13. Requirements for Gasoline Containers
14. Cargo Tank Testing and Documentation

Proposed Definition of Gasoline Dispensing Facility (GDF)

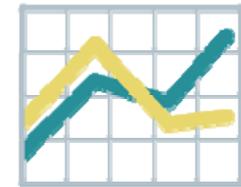


- Clarify our intent to include all **stationary** facilities that dispense gasoline into the fuel tanks of **all** end users (public & private)
- Proposing a new definition to reflect that intent
- Most of these smaller end users will not have throughputs that require submerged fill nor vapor balancing.



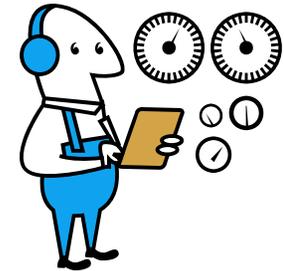
Proposed Throughput Thresholds:

- Throughput thresholds in rule used to define:
 - affected sources (*ex: plants vs. terminals*)
 - level of controls required
- Once Over A Throughput Threshold
 - Proposing once over any threshold then must comply, even if later going below threshold.
- Monthly Throughput Definitions
 - Proposing to clarify in the rule text how to calculate throughputs
 - Proposing to simplify and specify GDF throughput calculation..
sum of: current day + previous 364 days throughput, divided by 12



Clarification on Periodic Compliance Testing for Vapor Balance Systems (VBS) (required at $\geq 100,000$ gallon per month GDF)

- Current rule: Who is required to test? (section 63.11120(a))
 - Periodic (initially & every 3 years) testing of VBS:
 - Pressure-Vacuum valve leak rate and cracking pressure test
 - VBS static pressure test
 - All vapor balance systems must be tested as specified in this rule.
 - Except: if installed prior to 1/10/08,
 1. the installed VBS meets specific requirements, and
 2. it complies with a required SLT permit or rule (the SLT permit or rule may have its own testing requirements)
- Timing of tests for existing vapor balance systems
 - Current rule requires initial test “at the time of installation” of VBS
 - What about existing VBS at existing GDF? ... Proposing the following:
 - VBS installed on or before 12/15/2009 ... no later than 180 days after the compliance date (1/10/2011)
 - VBS installed after 12/15/09 ... test upon installation of the complete VBS



Definition of Gasoline:



- Current rule cross references the definition in the NSPS:

Gasoline means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater which is used as fuel for internal combustion engines.

- Proposing:

- for clarity, add definition to rule text of these rules
- ethanol blends of 10% and 85% meets vapor pressure in current definition
- any mixture with gasoline, even if not meeting the vapor pressure limit in current definition, be considered gasoline controlled under this rule

example: “denatured ethanol” that is denatured using gasoline/blends

In Conclusion:

- **The 12-15-2009 Proposal Comment Period Ends 2-16-2010**

- **Contacts:**
 - **Applicability and Compliance Questions:**
 - EPA Regional Office or
 - Delegated Authority

 - **Rule Amendments:** (contact information in proposal notice)
 - **General Info: Steve Shedd**
 - **Compliance Info: Rebecca Kane**

Attachment: Additional Information

■ **Federal Register notices contain information about the rule as well as the rule text.**

- **Proposal Notice:** 11-9-06, 71 FR 66064 www.epa.gov/ttn/atw/gasdist/fr08ja07.pdf
- **Final Notice:**
 - FR Notice: 1-10-08, 73 FR 1916 www.epa.gov/ttn/atw/area/fr10ja08.pdf
 - Fact Sheet: 12-20-07 www.epa.gov/ttn/atw/area/gasdistfs122007.pdf
- **Corrections:** 3-7-08, 73 FR 12275 www.epa.gov/fedrgstr/EPA-AIR/2008/March/Day-07/a4554.pdf
- **Amendments:** 6-25-08, 73 FR 35939 www.epa.gov/ttn/atw/gasdist/fr25jn08.pdf
- **Proposed Amendments:** 12-15-2009, 74 FR 66470 <http://edocket.access.gpo.gov/2009/pdf/E9-29570.pdf>

■ **Implementation Websites:**

- Gasoline Distribution HAP Rules: www.epa.gov/ttn/atw/gasdist/gasdispg.html
 - FR Notices
 - Background Documents
 - Fact Sheets
- Area Source Program: www.epa.gov/ttn/atw/area/arearules.html
 - Example notifications
 - Summaries
 - Summary Brochures

Attachment: EPA Regional Air Toxics Contacts - 2009

(original source: www.epa.gov/ttn/atw/area/regional_contacts.pdf , with added gasoline distribution program info.)

EPA Region	Geographical Area	Contact Name, Phone, & e-mail (& work area if different than general air toxics contact)
I	CT, MA, ME, NH, RI, VT	Susan Lancey, (617) 918-1656, lancey.susan@epa.gov (& gasoline distribution rules)
II	NJ, NY, PR, VI	Umesh Dholakia, (212) 637-4023, dholakia.umesh@epa.gov
III	DE, MD, PA, VA, WV, DC	Ray Chalmers, (215) 814-2062, Chalmers.ray@epa.gov
IV	FL, NC, SC, KY, TN, GA, AL, MS	Lee Page, (404) 562-9131, page.lee@epa.gov Ray Gregory, 404-562-9116, gregory.ray@epa.gov (gasoline distribution)
	IL, IN	Brent Marable, (312) 886-6812, marable.brent@epa.gov
V	WI, MN	Constantinos Loukeris, (312) 353-6198, loukeris.constantinos@epa.gov
	OH, MN	William Macdowell, (312) 886-6798, macdowell.william@epa.gov
		Rae Trine (312), 353-9228, Trine.rae@epa.gov (small business & delegation)

Attachment: EPA Regional Air Toxics Contacts - 2009 (Con't)

(original source: www.epa.gov/ttn/atw/area/regional_contacts.pdf , with added gasoline distribution program info.)

EPA Region	Geographical Area	Contact Name, Phone, & e-mail (work area if different than general air toxics contact)
VI	AR, LA, NM, OK, TX	Richard Barrett, (214) 665-7227, barrett.richard@epa.gov , or Albert Alonzo, (214) 665-6798, alonzo.albert@epa.gov
VII	IA, KS, MO, NE	Gwen Yoshimura, (913) 551-7073, yoshimura.gwen@epa.gov (& delegations) Bill Peterson (913) 551-7881, peterson.bill@epa.gov (gasoline distribution)
VIII	CO, MT, ND, SD, UT, WY	Joshua Rickard, (303) 312-6460, rickard.joshua@epa.gov (6C: gasoline dispensing facilities enforcement) Laurie Ostrand, (303) 312-6437, ostrand.laurie@epa.gov (6B: bulk gasoline facilities enforcement) Victoria Parker-Christensen, (303) 312-6441, parker-christensen.victoria@epa.gov (air program & delegation)
IX	CA, AZ, HI, NV, GU, AS, MP	Mae Wang, (415) 947-4124, wang.mae@epa.gov (& delegations) Ed Snyder, (415) 947-4186, snyder.ed@epa.gov (general area source) John Brock, (415) 972-3999, brock.john@epa.gov (gasoline distribution compliance)
X	AK, ID, WA, OR	Madonna Narvaez, (206) 553-2117, narvaez.madonna@epa.gov Heather Valdez, (206) 553-6220, valdez.heather@epa.gov (area source program & gasoline distribution)