

INDEPENDENT LIQUID TERMINALS ASSOCIATION

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February 7, 2007

Mr. Stephen Shedd
Environmental Protection Agency
Office of Air Quality Planning and Standards
Sector Policies and Programs Division
Coatings and Chemicals Group (E143-01)
Research Triangle Park, NC 27711

**Re: Docket ID No. EPA-HQ-OAR-2006-0406
November 9, 2006 Proposed Rule for National Emission Standards for Hazardous Air
Pollutants (HAPs) for Gasoline Distribution Facilities, 40 CFR Part 63**

Dear Mr. Shedd,

ILTA is pleased to submit comments on EPA's proposed rule on HAP emissions from area sources within the gasoline distribution industry. We are responding specifically to EPA's request for comments on the suitability of monitoring the presence of a pilot flame in enclosed vapor combustion units (VCUs).

ILTA agrees that monitoring for the presence of a pilot flame is suitable to ensure VCU compliance meeting GD-GACT standards. Furthermore, ILTA supports the EPA proposed alternative providing for monitoring the presence of a pilot flame in these units.

As the rule applies specifically to the control of gasoline vapor, it is commonly understood that gasoline vapors are highly combustible in all commonly encountered atmospheric conditions. Consequently, a pilot flame in the presence of gasoline vapors will result in the rapid and efficient combustion of these vapors.

ILTA rationale in support of our position is derived from a review of performance test data as well as recommendations from unit manufacturers. Our support for this approach is supplemented by the recommendation of appropriate maintenance measures.

(1) Performance Test Data

ILTA has surveyed gasoline distribution area source VCU performance data over multiple years. A summary table of all data collected is provided as Attachment I. This summarizes all identified unit test data collected in accordance with specified 6-hour testing standards.

These data are grouped by facility in instances when multiple tests have been conducted on a single unit. They show that the units operate robustly across a wide range of operating conditions. In all known cases, unit performance is observed to be well within compliance objectives when a pilot flame is present.

Of the 105 tests identified and reported, both gasoline vapor emissions and total fuel vapor emissions were, in all cases, considerably below the 80 mg/L regulatory limit. Due to a higher volatility than diesel fuel, gasoline VOC emissions concentrations were marginally higher than VOC emissions for all fuels.

The maximum reported gasoline emissions concentration was 34.3 mg/L, or less than half of the proposed regulatory limit. The mean and median values from all 105 tests were 10.1 and 7.3 mg/L respectively.

The background materials that support individual line items in Attachment I are too extensive for inclusion. This presentation represents overall emissions, loading rates, and atmospheric conditions recorded as five-minute averages for the duration of each 6-hour testing period. EPA was presented with one complete set of data during its meeting with industry representatives on December 20, 2006.

(2) Manufacturer Recommendation

The leading VCU manufacturers guarantee their units to meet ratings of either 10 mg/L or 35 mg/L in the presence of a pilot flame, depending on unit configuration.

One manufacturer states, “vapor control systems are designed to handle wide fluctuations in both flow and vapor composition and (they) operate accordingly... (A)s the system inlet flow characteristics vary, the combustion process parameters also vary greatly. VCUs are designed to optimize the interaction of time, temperature and turbulence in the handling of wide ranging flow characteristics inherent in terminal vapor control applications.”

These units are equipped with shut-off devices which stop the flow of vapor if the pilot flame is extinguished. These manufacturers recommend monitoring presence of a pilot flame as the appropriate means to ensure compliance by their operators.

(3) Vapor Combustion Unit Maintenance

ILTA and API have worked together in the development of proposed maintenance provisions. Detailed comments are being presented by API in a separate letter to the docket. The following recommendations would be applicable to VCU operators regulated under this rule who elect to demonstrate compliance by monitoring for presence of a pilot flame:

- Conduct and document initial performance tests for each regulated VCU;
- Automatically shut-down flow to the VCU in the event of an extinguished pilot flame, and document each such occurrence;
- Visually observe assist-air blower operation, vapor-line operation, and emergency shut-down operability each day of manned operation, and document all malfunctions; and
- Perform and document semi-annual preventive maintenance of the VCU.

Conclusion

Based on a review of the attached 6-hour tests of VCU performance, manufacturer recommendations to ensure unit compliance through monitoring for presence of a flame, and assurance of appropriate unit monitoring and maintenance, ILTA strongly supports the monitoring for the presence of the pilot flame as sufficient to ensure compliance with loading rack emissions requirements under this proposed rule.

A handwritten signature in blue ink, appearing to read 'R. Peter Weaver', is centered on the page. The signature is fluid and cursive, with a large initial 'R' and 'W'.

R. Peter Weaver
Director of Regulatory Compliance and Safety
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