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December 22, 2006
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Rob Ferry's summary of EPA's Final Gasoline Distribution GACT (area source) Rule

The rule package contains two rules:
Part 63 Subpart BBBBBB – Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
Part 63 Subpart CCCCCC – Gasoline Dispensing Facilities

The summary below does not detail each requirement of these rules, but rather highlights selected provisions.

Subpart BBBBBB – Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

§63.11081 This rule applies to the following facilities, unless such facility is subject to either Gasoline Distribution MACT or Refinery MACT:

- bulk gasoline terminals,
- bulk gasoline plants,
- pipeline breakout stations, and
- pipeline pumping stations.

§63.11083 Existing sources have three years to comply. However, paragraph 63.11087(b) allows for tanks with floating roofs to wait until the next degassing and cleaning, but not longer than 10 years.

§63.11086 Bulk gasoline plants. Requirements are:

- submerged fill for tanks,
- monthly inspections for equipment leaks (sight, sound, smell), and
- observe good work practices with respect to spills.

§63.11087 Storage tanks at bulk terminals and pipeline facilities (including pumping stations). Requirements are specified in Table 1:

- controls are required for tanks larger than 75 m^3 (about 20,000 gallons).
- controls are to be either:
  - route vapors to a control device with at least 95% efficiency, or
  - equip the tank with a floating roof.
- floating roof requirements allow complying with either NSPS Kb or Part 63 Subpart WW, except:

  In either case, the MACT rule exceptions apply:
  - IFRTs do not require deck fitting gaskets, and
  - EFRTs only require deck fitting gaskets if the rim seal has to be upgraded to comply.

    (they spurned our suggestion of controlling the slotted guidepole of all EFRTs, choosing instead to leave the guidepole lumped in with other deck fittings, and thus only requiring guidepoles to be controlled for those EFRTs which need their rim seals upgraded)

  Under the Kb option, IFRTs are allowed to have a vapor-mounted primary seal without a secondary seal. The WW option does not have this exception.

  EPA did not provide for switching from Kb to WW for tanks presently subject to Kb.

§63.11088 Gasoline loading racks. Requirements depend upon throughput, per Table 2:

- if less than 250,000 gallons per day, submerged fill is required.
- if greater than 250,000 gallons per day:
    - route vapors to a control device to achieve less than 80 mg/l, and
    - only load into cargo tanks that have been annually tested to the 60.502(e) standard of a maximum 3-inch pressure drop during the pressure decay test [NSPS Subpart XX].

§63.11092 Control device requirements:

Flares must comply with 63.11(b) and be monitored for the presence of a pilot flame.

Initial performance test is required as per 60.503 for control devices other than flares (but with a leak definition of 500 ppm), unless:

- the loading rack is already being operated in compliance with a standard of 80 mg/l or less, or
- a qualified performance test has been performed within the past 5 years.

Control device monitoring requirements:

- Carbon adsorption, either;
    - CEMS, or
    - vacuum level and visual inspection daily, VOC concentration monthly, carbon activity annually, and semi-annual preventive maintenance.
- Refrigeration condenser system, either:
    - CEMS, or
    - temperature continuously.
- Thermal oxidation unit (other than flare), either:
    - firebox temperature continuously, or
    - presence of a pilot flame with automatic shutdown, daily visual inspection, and semi-annual preventive maintenance.

§63.11089 Equipment leaks. Monthly inspections (sight, sound, smell).

§63.11093 Notifications. Initial Notification and Notification of Compliance Status are required. If already in compliance when the Initial Notification is due, then only the NOCS is required.

§63.11095 Reporting. Semiannual, including an excess emissions report.

Subpart CCCCCC – Gasoline Dispensing Facilities

§63.11113 Existing sources to be in compliance within 3 years.

§63.11116 If less than 10,000 gallons per month throughput, minimize spills, etc.

§63.11117 If between 10,000 and 100,000 gallons per month throughput, equip tanks with submerged fill.

§63.11118 If greater than 100,000 gallons per month throughput, employ submerged fill and vapor balancing. Tank trucks and vapor lines to be vapor tight, and tank vents are subject to testing.