

Changes to VOC RACT Rules at 16.2 – Storage Tanks
Summary of Rule Provisions/Issues/Action Items

Category	Proposed Requirements	Issues
Fitting and Seal Requirements	Fitting and seal requirements are predominantly taken directly from SCAQMD Rule 1178. The timeframe for compliance is at first degassing event, but no later than May 1, 2020.	<ol style="list-style-type: none"> 1. Are exemptions comprehensive enough and at appropriate levels? 2. How will compliance with provisions related to “leak-free” conditions and %LEL limits be demonstrated?
Doming for EFR’s	The rule requires domes for EFR's storing materials with VP>3 psi	<ol style="list-style-type: none"> 1. Is Domed external floating roof tank adequately defined? 2. Is the 3 psia trigger an instantaneous one? Should an annual average VP of 3 psi be the trigger?
Roof Landing Emissions	<ol style="list-style-type: none"> 1. Catch-all provisions with “loose” regulatory language, such as: <ol style="list-style-type: none"> a. The roof shall float at all times; b. Emptying/refilling should be as rapid as possible; 2. Legs at lowest setting, IFR’s have until next degassing event; EFR’s must comply at operative date 3. Requires submittal of a facility wide tank VOC control plan, within 120 days, unless the tank emits <5 tpy from landings, that identifies: <ol style="list-style-type: none"> a. tank-specific details and inspection schedule; and b. schedule to implement emission controls that include: <ol style="list-style-type: none"> i. low-landers; ii. controlling refilling emissions with a 90% effective emission control until within 10% of refloat iii. Department approved alternate controls are allowed <p>OR</p> <ol style="list-style-type: none"> a. tank-specific details and inspection schedule; and b. Must also prepare a facility wide emissions averaging plan that reduces VOC emissions from roof landings to 5 tpy/tank by 2011, scheduled down to 2 tpy/tank by 2020. 	<ol style="list-style-type: none"> 1. Compliance demonstrations are challenging when rule language is vague. What is as “quickly as possible”? Can a partial/full heel condition exist for 3 days? 7days? 2. There is no timeline for setting the EFR at the lowest leg setting; DEP claims that this can be done while the tank is in service. 3. Any exemptions should “discount” VOC emissions from RVP changeovers. <ol style="list-style-type: none"> a. Why does DEP require tank details and inspection schedules; are the latter going to become enforceable permit limits? b. The control options of low landers or 90% control are not feasible for existing tanks; the DEP should differentiate between new and existing tanks. c. Preamble states that facilities will have “flexibility” to control some tanks and not others, but meet the overall averaging required by the averaging plan. Rule language does not clearly reflect this intent. The averaging plan as written penalizes large tanks; the plan should be a capacity-weighted average. d. The timeline is overly aggressive. The rules do not address how this timeline may or may not coincide with actions taken to obtain a federally enforceable limit on per tank landings. Should there be review timelines for DEP or is it better to leave these documents as drafts for as long as possible?

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Degassing and Cleaning	<p>During Ozone season</p> <ol style="list-style-type: none"> 1. Control VOC during degassing by: <ol style="list-style-type: none"> a. exhausting VOC to a 95% efficient control until 5000 ppm is met; or b. Control VOC during refilling by 95% by refilling with "suitable liquid" until 90% full 2. Use certain materials for cleaning, or do steam cleaning 3. Control emissions from sludge removal by 95% 	<ol style="list-style-type: none"> 1. Ozone season exemption is favorable; <ol style="list-style-type: none"> a. Is the 5,000 ppm threshold is lower than CA rules? 2. Does steam cleaning introduce concerns relative to generating static and presenting explosion hazards? 3. Should there be exemptions from sludge cleaning requirements if the tank is at a certain %LEL and not a VOC emission contributor? How do you control vac truck emissions during sludge removal? 4. Will there be a permitting mechanism for temporary cleaning?
Inspections and Records	<ol style="list-style-type: none"> 1. Inspections must be conducted by authorized inspector using the DEP-prescribed form; frequency is annually in most instances. 2. Defective piping, valves, vents, seals, gaskets, or covers must be repaired immediately if tank is degassed or no later than 45 days. 3. Noncompliance with fitting and seal requirements identified during inspections must be reported as part of Title V compliance reporting as a deviation. 4. Records retention is for the life of the tank. 	<ol style="list-style-type: none"> 1. Inspections are stated to be consistent with 40 CFR Part 60 Subparts Ka and Kb. 2. Is a 45-day timeline reasonable for repairs? 3. The rule should allow a "first attempt at repair" before it needs to be cited as a deviation to the operating permit. 4. Are authorized API inspectors appropriate?
Emission Statement Submittals	<ol style="list-style-type: none"> 1. VOC emissions from landings must be submitted under separate operating scenarios. 2. Concurrently with the Emission Statement, facilities must electronically submit a "Floating Roof Landing Emission Summary Report" that includes, among other things: <ol style="list-style-type: none"> a. Tank materials stored and their respective vapor pressures; and b. Floating roof landing height setting. 	<ol style="list-style-type: none"> 1. Will DEP require each facility to re-align its permit so to that landings are captured in separate operating scenarios? 2. Why does the Emissions Statement pram require information to this level of detail? What is the burden on facilities? 3. If the operative date of the rule is prior to May 2009, will these provisions apply to the 2008 submittal?