

08/17/1979

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Category: 11 – Stage I Vapor Recovery Roof Tanks

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

DATE: AUG 17 1979

SUBJECT: Evaluation of 10,000 gals/month Throughput Exemptions for Petroleum Marketing Operations

FROM: Richard G. Rhoads, Director
Control Programs Development Division (MD-15)

TO: Director, Air & Hazardous Materials Division, Regions I-X

All previous Agency actions with regard to exemptions for Stage I petroleum marketing operations have been based on tank size. However, some States are exempting on throughput instead of tank size and not providing technical support which demonstrates that this exemption is insignificantly different from previous Federal actions (e.g., within 5 percent of controlled emissions). In evaluating petroleum marketing operations, two sectors must be considered separately: retail dispensing facilities (service stations, grocery stores, etc.), and private outlets.

The retail gasoline dispensing facilities account for about 77 percent of total volume and average approximately 40,000 gallons/month throughput per facility. Virtually all of these facilities would have a throughput in excess of 10,000 gallons per month.

The remaining 23 percent of total volume is distributed through "private" outlets such as local delivery fleets, agricultural users, county, State and local maintenance, police fleets, taxis, etc. These facilities average approximately 8,500 gallons per month. (See attached tables.)

Approximately 30 to 40 percent of the throughput of the private outlets, or 8-10 percent of total national throughput, would be exempted if regulated at a level of 10,000 gals/month. This is in comparison to approximately 3-5 percent of total throughput exempted by regulations which are based on tank size. However, even this difference is somewhat overstated. Stage I vapor recovery requirements apply primarily to urban areas. Agricultural consumption is minimal in these areas. Further, the average throughputs from "private" dispensing facilities tend to be higher in urban areas since central depots and major fleets are centered there. Finally, most of the available information is from the mid 1970's. There has been a significant trend to higher volume outlets since that period. Accordingly, the net difference in coverage between a regulation with a less than 2,000-gallon tank size exemption and a regulation with a 10,000-gallon per month throughput exemption in an urban area is likely to be within 3 percent.

In the absence of locally generated technical support data, I recommend you propose to approve exemptions of no more than 10,000 gals/month or 120,000 gals/year, and propose to disapprove exemptions greater. If no persuasive comment to the contrary is received, take final action as proposed.

Attachment

cc: Chief, Air Branch, Regions I-X
Mike James
Ed Reich, DSSE

Attachment

Table I. National Gasoline Dispensing Statistics

	Number of Facilities	Number of Throughput	Average Monthly Throughput
Retail Service Stations	178,390	77	39,400
Government*	88,520	2	2,500
Agriculture	32,600**	3	4,000
Trucking & Local Service	21,900	5	20,000
Taxis	5,380	1	13,700
Miscellaneous	94,530	12	11,000
Total	421,320	100	

* Includes military, Federal, State, county, municipal, and school districts

** Does not include approximately 2.7 million - small (275-500 gal) tanks

Table 2. Examples of Facilities with Less Than 10,000 Gallons/Month Throughput

End-Use Sector	Exempted
Retail Service Stations	Virtually none
Government	Decentralized municipal facilities (e.g., police departments with less than 25 cars)
Agriculture	Virtually all
Trucking & local services	Smaller delivery fleets
Taxis	80% of all fleets
Miscellaneous	Most corporate fleets less than 100 vehicles Rental car stations less than 250 vehicles