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**Category:** 25 – Gasoline Tank Trucks

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

DATE: JUN 16, 1980

SUBJECT: Gasoline Tank Truck Regulations

FROM: Richard G. Rhoads, Director  
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TO: Jack Divita, Chief  
Air Programs Branch, Region VI

This is to confirm previous telephone conversations with my staff concerning the necessity to develop regulations for gasoline tank trucks in areas demonstrating attainment by 1982. Prior EPA guidance has provided that:

"Urban and rural nonattainment areas not needing an extension until 1987 may have a cutoff source size of 100 tons per year if they can demonstrate attainment by 1982."

As indicated above, the tank truck regulations are necessary where nonattainment area extensions until 1987 are required.

Nonattainment areas that demonstrate attainment by 1982 may have a cutoff source size of 100 tons per year. In line with this policy, regulations for Stage I service stations, bulk plants, and smaller degreasers were not required for the Group I CTG categories.

Tank trucks are less than 100 tons per year sources and, as such, under present policy would be exempt from a CTG recommended annual certification regulation. However, tank trucks are an integral part of bulk terminal operations (which are generally 100 tons per year sources). Essentially leakless tank trucks compatible with bulk terminal vapor control were required to comply with bulk terminal regulations previously adopted during the Group I CTG regulation development.

In summary, in areas attaining by 1982, separate regulations covering tank trucks are strongly encouraged. In any event, in order for the terminal regulation (mass emission standard of 80 mg/l) or an efficiency standard of (90 percent by weight) to be effective, the tank trucks loading gasoline at regulated terminals must be essentially leakless and equipped for vapor collection so that vapors generated in the tank trucks during loading

operations are vented to the bulk terminal vapor control system. The State regulations will have to include a test method that addresses the leak tight tank truck conditions. For additional information, please call Bill Polglase (629-5251) or Tom Williams (629-5226).

cc: Chief, Air Branch, Regions I-V, VII-X  
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