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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

JUL 18, 1980

Mr. John Calhoun, President
Texas Oil Marketers Association
701 W. 15th Street
Austin, Texas 78701

Dear Mr. Calhoun:

Thank you for your letter of June 6, 1980 to Mr. Douglas Costle in which you expressed concern over the EPA recommended leak tightness test for gasoline transport tank trucks. The test requires tanks to withstand a pressure change of no more than 3 inches of water in 5 minutes when pressurized to 18 inches or evacuated to 6 inches of water.

In a detailed study to develop background information for the Control Techniques Guideline document, EPA tested a fleet of California tank trucks of various ages (1962-1978) and found that all the tanks are spring-loaded and designed to slowly open and be fully open at 1 psi (27 inches of water) pressure as specified by DOT regulations. The 18 inches of water pressure test is well below the design limitation of the pressure relief valves.

The EPA tests further determined that the additional maintenance required for tanks to meet an 18-inch test as opposed to a 13-inch test was minimal. The largest expense is in the first year of the program when the tank trucks undergo maintenance for the first round of testing. Results of the EPA testing are contained in the report, "Evaluation of Vapor Leaks and Development of Monitoring Procedures for Gasoline Tank Trucks and Vapor Piping," EPA 450/8-79-018. A copy of this report is enclosed for your information.

The 18 inches of water pressure test has been used in California since 1977 on new and existing tank trucks. The California testing program now in its third year shows that tanks, regardless of age, can with proper maintenance pass the 18-inch pressure test.

The test procedure recommended by the Truck Trailer Manufacturers Association (TTMA) does recommend a 13-inch test for trucks operating in jurisdictions without a leak tightness regulation. The TTMA procedures also advise that tank trucks operating in jurisdictions with leak tightness regulations must be tested per the applicable regulation.

Based on TTMA tests and the success of the California program, we see no reason to change the 18-inch pressure test. Please contact Mr. Tom Helms, Office of Air Quality Planning and Standards, Environmental Protection Agency, MD-15, Research Triangle Park, NC 27711 (919/541-5226), should you have further questions or need additional information.

Sincerely yours,

Richard G. Rhoads
Director
Control Programs Development Division

Enclosure

cc: Adlene Harrison, Regional Administrator, EPA
Bill Stewart, Executive Director, TACB

Enclosure

TRANSPORTATION SALES & MARKETING ASSOCIATION (TSMA)
701 W. 15th Street
Austin, Texas 78701
(512) 476-9547

June 6, 1980

Mr. Douglas Costle
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Mr. Costle:

Petroleum distributors in Texas need your immediate attention! Are you aware that your agency has mandated that the State of Texas utilize a test procedure for checking the leak tightness of gasoline transport trucks, including those that have operated for many years, which is more stringent than the test procedure recommended by the Truck Trailer Manufacturers Association of new trucks?

In a preliminary draft of Regulation V of the Texas State Implementation Plan, Section 2115.261, Emission Control Requirements, Paragraph (1) (b) requires a level of pressure of 18 inches of water, when the criterion used in the "Recommended Practice No. 50-79 on Leak Testing of New Cargo Tank Vapor Recovery Systems," is 13 inches of water.

Obviously, trucks in service should not be expected to withstand a higher test pressure, such as the proposed 18 inches, than they were tested for when they were built.

Why then, does the Environmental Protection Agency say that it will reject the Texas State Implementation Plan if the leak testing procedure recommended for new tanks by the TTMA is utilized instead of the ridiculously stringent rules suggested by EPA?

Enclosed is a copy of the comments presented to the Texas Air Control Board with our specific recommendation in this area on Page 2. Also enclosed is the TTMA recommended practice for leak testing.

On behalf of the 800 companies that our Association represents, we urge that you immediately reevaluate and permit state implementation plans to utilize the TTMA recommended practice rather than the unreasonably stringent requirement that the Texas Air Control Board says they are forced to use.

The TACB is in the final drafting stages of this regulation and because of this we request your immediate attention to this issue. If you have any

questions, please contact our Executive Vice President, Dave Fellers, in our Austin office.

Cordially,

John Calhoun
President

JC/vk

enc.

cc: Adlene Harrison, Regional Administrator, EPA
Bill Stewart, Executive Director, TACB
Senator Lloyd Bentsen
Senator John Tower