

07/23/1980

VOC250723801

Category: 25 – Gasoline Tank Trucks

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

23 JUL 1980

Mr. Kenneth A. Hagg, Chairman
Northeast States for Coordinated Air Use Management
Boston College Weston Observatory
Weston, Massachusetts 02193

Dear Mr. Hagg:

In your letter of June 18, 1980 you indicated that there were major problems with the EPA guidance on the control of leaks from gasoline tank trucks and that because of so many unanswered questions relating to monitoring, testing, and enforcement, the States should not develop regulations at this time. Since you did not describe your specific concerns, I can only address the CTG category in general terms.

EPA has developed the following documents for the States to use in developing regulations to control gasoline tank trucks and vapor collection systems:

- a. Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems, EPA 450/2-78-051.
- a. Evaluation of Vapor Leaks and Development of Monitoring Procedures for Gasoline Tank Trucks and Vapor Piping, EPA 450/3-79-018.
- b. Survey of Gasoline Tank Trucks and Rail Cars, EPA 450/3-79-004.
- c. Guidance to State and Local Agencies in Preparing Regulations to Control Volatile Organic Compounds from Ten Stationary Source Categories, EPA 450/2-79-004.

The Control Techniques Guideline document for gasoline tank trucks (a. above) recommends an annual certification program to maximize vapor tight conditions. A test procedure was included in Appendix A. The leak tight test for tank trucks required the tank to withstand a pressure change of no more than 3 inches of water in 5 minutes when pressurized to 18 inches of water or evacuated to 6 inches of water.

EPA purposely did not specify who should administer and perform the certification test and how the enforcement should be carried out. It is felt that these decisions should be left to the discretion of the States.

The gasoline terminal regulation (one of the Group I Control Techniques Guideline documents) requires all tank trucks loading at a regulated terminal to be leak tight. This is an important part of the terminal regulation because a large part of the VOC emissions at a terminal are from the loading of tank trucks. Likewise, the bulk plant and stage I regulations assume that leak tight tank trucks will prevent the release of captured vapors to the atmosphere.

The gasoline marketing RACT regulations (stage I, bulk plants, terminals) have been adopted by most States as a part of the ozone SIPs. We feel it is important that the emissions collected through these operations not be lost to the atmosphere through leaking gasoline tank trucks. Our test data show that a certification program will prevent the loss of 30 percent of the vapors collected by the tank trucks. Leaks from tank trucks and vapor collection systems must be minimized to prevent vapors from escaping to the atmosphere either during or after liquid transfer of gasoline.

The CTG for synthesized pharmaceutical products did not address gasoline tank trucks; therefore, your reference to this category is not clearly understood. The pharmaceutical CTG did recommend a vapor balance system for VOC storage tanks; however, the gasoline tank truck CTG is not applicable to this category.

The four documents listed above are enclosed for your information. Should you have further questions, please contact Tom Helms at 919/541-5226.

Sincerely yours,

Original signed by
Ronald C. Campbell

Walter C. Barber
Director
Office of Air Quality Planning
and Standards

Enclosures

cc: NESCAUM Directors
M. Hohman, Region I
P. Laing, Region I
P. Hagerty, Region I
B. Baker, Region II

Enclosures

Northeast States for Coordinated Air Use Management
(NESCAUM)

Connecticut Air Compliance Unit	New Jersey Bureau of Air Pollution
Maine Bureau of Air Quality Control	New York Division of Air Resources
Massachusetts Division of Air Quality Control	Rhode Island Division of Air Resources
New Hampshire Air Resources Agency	Vermont Air & Solid Waste Program

June 18, 1980

Mr. Walter Barber
Deputy Assistant Administrator
For Air Quality Planning and Standards
U.S. Environmental Protection Agency
Research Triangle Park, N.C. 27711

Dear Mr. Barber:

On May 28, 1980, Directors and staff from the eight NESCAUM states met to discuss development of regulations for the Group II CTG's. While a variety of issues and options were discussed, it was clear that all the states had major problems with the guidance received concerning the control of leaks from gasoline and other tank trucks. As a result, the attached resolution was developed and approved unanimously by the NESCAUM Directors.

While the group feels the source category may require regulating, there are simply too many unanswered questions relating to monitoring, testing, and enforcement to go ahead with regulations now. There appears to be a precedent for delaying the effective date or control requirements as happened with control of VOC's from vegetable oil manufacturers. We urge you to use a similar approach for this situation.

We look forward to having your response to our statement, and always, we can provide additional information as needed.

Thank you.

Very truly yours,

Kenneth A. Hagg
Chairman

cc: NESCAUM Directors
Mr. Hohman
Mr. Laing
Mr. Haggerty
Mr. Baker

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ext. 34

NESCAUM Resolution re:
VOC Regulations on Group II CTG's

WHEREAS, EPA has identified leaks from tank trucks as important sources of volatile organic compounds (VOC'S) that need to be regulated by the states. These sources are addressed in recently published control strategy guidance for two categories of VOC sources: Manufacturer of Synthesized Pharmaceutical Products (Sec. 3.5, Storage and Transfer), and Gasoline Trucks and Vapor Collection Systems, and;

WHEREAS, These sources create unique enforcement and regulatory problems since they are mobile and cross AQCR and state boundaries, and;

WHEREAS, States currently lack sufficient information on the number of such sources, quantity of emissions, test procedures, and enforcement techniques applicable to these emissions, and;

WHEREAS, EPA has failed to provide adequate guidance on the subject, and;

WHEREAS, States are opposed to promulgating regulations that they are unable to enforce or evaluate.

Now, THEREFORE, BE IT RESOLVED that the NESCAUM states will delay promulgation of their final regulations for Manufacturer of Synthesized Pharmaceutical Products and for Gasoline Tank Trucks and Vapor Collection Systems until such time as the appropriate technical information is available.

Approved 8-0 by NESCAUM Directors
May 29, 1980
Falmouth, Mass.