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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: January 17, 1983

SUBJECT: Allowable Tank Truck Terminal Emission Limits

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TO: File

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In reviewing proposed Federal Register notices for California, it was noted that the San Joaquin Air Pollution Control District has revised its hulk gasoline terminal regulation from requiring a 90 percent weight control of gasoline vapors vented from tank trucks during gasoline loading operations to the requirement that vapor control equipment installed before July 1, 1976, must meet a 0.9 lbs/10 (to the 3rd power) gallons loaded emission limit and vapor control equipment installed after July 1, 1976, must meet a 0.6 lb/10 (to the 3rd power) loaded emission limit. Region IX (Dennis Beauregard) stated that this change is based on a model regulation developed the California Air Resources Board.

The CTG recommends an emission limit of 80 mg/liter of gasoline loaded (0.67 lbs/10 (to the 3rd power) gallons loaded). Previously, it was determined that 90 percent weight control was equivalent to the CTG emission limit.

An analysis of the comparability of the emission limits cited above are as follows:

PERCENT CONTROL AT VARYING EMISSION LIMITS

Uncontrolled Emission Factor (AP-42)	Emission Limits				
	(CTG)				(NSPS)
	90% Control	0.6 lb/1000 gal	0.67 lbs/1000 (80 mg/liter)	0.9 lb/1000 gal	0.292 lb/1000 (35 mg/liter)
Splash fill 12 lbs/1000 gal	90%	95%	94.4%	92.5%	97.6%
Splash or sub- merged fill balance service 8 lbs/1000 gal	90%	92.5%	91.625%	88.75%	96.3%
Submerged fill 5 lbs/1000 gal	90%	88%	86.6%	82%	94.2%

Based on the above, the emission limit of 0.9 lb/1000 gallons is within 5 percent of the CTG emission limit (0.67 lb/1000 gallons) and is acceptable as RACT. The 0.6 lb/1000 gallon emission limit is more stringent than the emission limit cited in the CTG (0.67 lb/1000 gallons).

NOTE: NSPS for bulk gasoline terminals promulgated 8/18/83 – effective date 12/17/80.

Emission limits:

1. New facilities - 35 mg/liter
2. Facilities with "existing vapor processing system" - 80