PUBLIC WORKSHOP AND CEQA SCOPING MEETING
PROPOSED AMENDED RULE 1178
FURTHER REDUCTIONS OF VOC EMISSIONS FROM
STORAGE TANKS AT PETROLEUM FACILITIES

January 11, 2018
SCAQMD Headquarters
Diamond Bar, CA
Background

- Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II amended in May 2017
  - Adoption resolution directed staff to work with stakeholders to introduce proposed amendments to Rule 1178 to:
    - Incorporate VOC control technologies for guidepoles in floating roof tanks as recognized by U.S. EPA; and
    - Explore mechanisms to minimize permitting impacts when addressing VOC control technologies for guidepoles in floating roof tanks that are subject to the Rule 1178

- Staff is proposing amendments to Rule 1178 to incorporate one additional technology recognized by U.S. EPA in their 2000 Storage Tank Emission Reduction Partnership Program (STERPP) agreement
Rule 1178 Background

- Adopted in December 2001
- Amended in April 2006
- Reduce VOC emissions from large storage tanks at petroleum facilities
  - Tank upgrades – roof, seals, fittings
  - Self-inspection and maintenance
  - Compliance reporting
Rule 1178 Applicability

• Applicability
  ▪ Aboveground petroleum storage tanks \( \geq 19,815 \text{ gals (75,000 liters)} \);
  ▪ Organic liquids with a true vapor pressure \( > 0.1 \text{ psia} \) (under actual storage conditions); and
  ▪ Petroleum facilities \( > 20 \text{ tons per year VOC in any emission inventory year beginning 2000} \)

• Affected facilities
  ▪ Crude petroleum operations
  ▪ Petroleum refining facilities
  ▪ Petroleum bulk stations and terminals
In 2000, U.S. EPA entered into Storage Tank Emission Reduction Partnership Program (STERPP) agreement to reduce emissions from slotted guidepoles.

Current Rule 1178 provisions for slotted guidepoles are acceptable options under the STERPP.

In addition to current Rule 1178 provisions, STERPP recognized flexible enclosure (vapor sock or “slinky”) system as an acceptable option.
Proposed Definition (c)

- Flexible Enclosure System (FES)
  - VOC reduction system that completely encloses slotted guidepole eliminating vapor emission pathway
  - Fabric must be made of VOC impervious material which is ultraviolet light resistant
## Proposed Requirements - External Floating Roof Tanks with Slotted Guidepoles (d)(1)(A)

### Pole Float
- Gasketed Cover
- Pole Float Wiper
- Pole Wiper

### Flexible Enclosure System
- Gasketed Cover
- Pole Sleeve
Flexible Enclosure System (d)(1)(A)(xii)

- Flexible fabric shall completely enclose the slotted guidepole
- Fabric shall be free of holes, tears, slots, rips, or gaps
- Tightly double-clamped and secured to top and bottom of slotted guidepole
- Used in conjunction with radar gauging system
Proposed Requirements (d)(2)(D) and (d)(3)(C)

• Flexible enclosure system option available to domed external floating roof tanks and internal floating roof tanks
  - Pole sleeve not required
  - (d)(1)(A)(xiii) – still applies
    • Cover each slotted guidepole opening with a gasketed cover at all times with no visible gaps except when it must be opened for access
Proposed Maintenance Requirements (g)

• Clarify that repairs must be made within 72 hours after any inspection determines that the equipment is not operating in compliance
Proposed Record Keeping and Reporting Requirements (h)(3)

• Specifies dates that semiannual reports are due
Inspection Procedures and Compliance Report Forms

- Inspection procedures updated to include semiannual inspections of flexible fabric cover for holes, tears, slots, rips, or gaps
- Compliance form updated accordingly
California Environmental Quality Act (CEQA)

• California State Law adopted 1970
• Purpose  [CEQA Guidelines Section 15002(a)]
  – Inform governmental decision-makers and public about potential significant effects of projects
  – Identify ways to avoid or reduce adverse impacts
  – Require feasible alternatives and mitigation measures to prevent significant environmental damage
  – Disclose to the public why a project was approved
• Applies to projects undertaken by a Public Agency such as SCAQMD adoption of rules  [CEQA Guidelines Section 15002(b)]
  ▪ Required to comply with CEQA when approving a project  [CEQA Guidelines Section 15002(d)]
  ▪ Required for discretionary approvals  [CEQA Guidelines Section 15002(i)]
• Lead Agency = SCAQMD
  – Oversight and legal responsibility for appropriate CEQA document preparation, circulation, response to comments, and approval/certification
• PAR 1178 is a project subject to CEQA
• Purpose of CEQA Scoping is to seek input from the public regarding the effects of the project
• CEQA Staff evaluating project to identify potential impacts areas and will prepare either:
  ‣ an Environmental Assessment (EA) if impacts are identified; OR
  ‣ A Notice of Exemption if it can be seen with certainty that there is no possibility that the proposed project may have a significant adverse effect on the environment
Potential Cost Impacts

- Expected to be minimal
## Schedule

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<tr>
<th>Action</th>
<th>Target Dates</th>
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<td>February 16, 2018</td>
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<tr>
<td>Set Hearing</td>
<td>March 2, 2018</td>
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<tr>
<td>Public Hearing</td>
<td>April 6, 2018</td>
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## Contact Information

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<tr>
<th>Category</th>
<th>Name</th>
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