

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

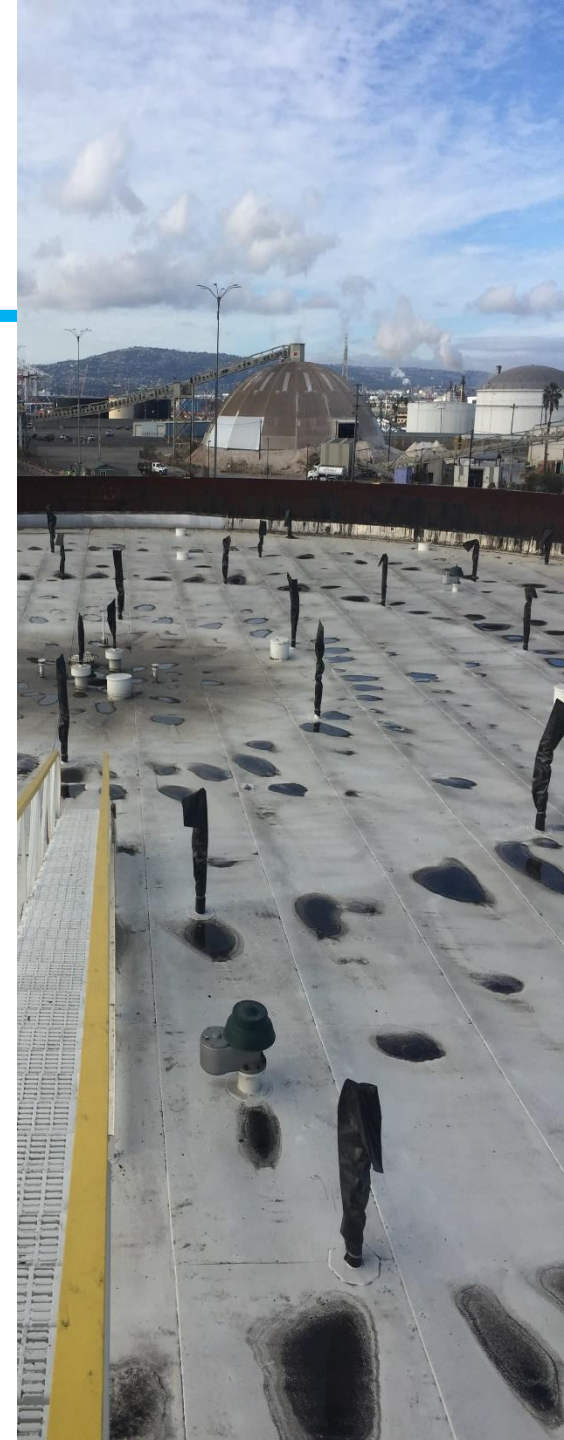


Background

- 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



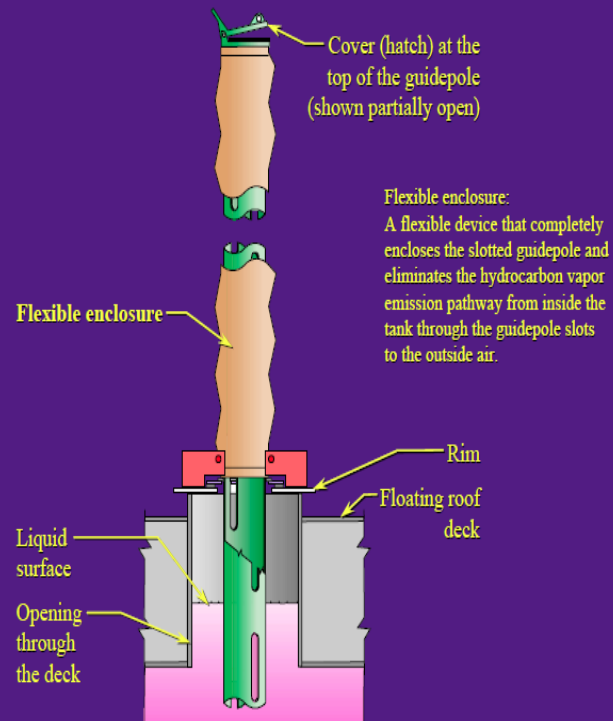
Rule 1178 Applicability

- Applicability
 - Aboveground petroleum storage tanks $\geq 19,815$ gals (75,000 liters);
 - Organic liquids with a true vapor pressure > 0.1 psia (under actual storage conditions); and
 - Petroleum facilities > 20 tons per year VOC in any emission inventory year beginning 2000
- Affected facilities
 - Crude petroleum operations
 - Petroleum refining facilities
 - Petroleum bulk stations and terminals



U.S. EPA STERPP Agreement

STERPP Option 6: Flexible Enclosure



TGB

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the TGB partnership

- 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 an 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

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
RULE 1178 COMPLIANCE REPORT**

****PLEASE COMPLETE FORM LEGIBLY IN BLACK INK****

Tank No. _____ SCAQMD Permit No. _____ Inspection Date _____ Time _____
Is this a Follow-up inspection? No ☐ Yes ☐ If yes, Date of Previous inspection _____
SCAQMD ID No. _____

A. COMPANY INFORMATION:
Company Name _____
Location Address _____ City _____ Zip _____
Mailing Address _____ City _____ Zip _____
Contact Person _____ Title _____
Phone _____

B. INSPECTION CONDUCTED BY:
Name _____ Title _____
Company Name _____ Phone _____
Mailing Address _____ City _____ Zip _____

C. TANK INFORMATION:
Capacity _____ (bbls) Installation Date _____ Tank Diameter _____ (ft) Tank Height _____ (ft)
Product Type _____ Product RVP _____
Type of Tank: Riveted ☐ Welded ☐ Other ☐ (describe) _____
Color of Shell _____ Color of Roof _____
Roof Type: Penton ☐ Double Deck ☐ Other (describe) _____
External floating roof ☐ Internal floating roof or domed tank ☐ Flexible (skirted, webbed) enclosure ☐

D. GROUND LEVEL INSPECTION:
1) Product Temperature _____ °F 2) Product level _____ (ft)
3) List type and location of leaks found in tank shell.

4) List any discrepancies between the existing equipment and the equipment description on the Permit.

5) Is tank in compliance with Permit conditions? No ☐ Yes ☐ If no, explain _____

PAR 1178-23

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

CEQA (continued)

- 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

Action	Target Dates
Stationary Source Committee	February 16, 2018
Set Hearing	March 2, 2018
Public Hearing	April 6, 2018

Contact Information

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