WORKING GROUP MEETING #1
PROPOSED AMENDED RULE 1178
FURTHER REDUCTIONS OF VOC EMISSIONS
FROM STORAGE TANKS AT PETROLEUM
FACILITIES

December 12, 2017
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 ≥ 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
Current Specifications for Slotted Guidepoles for External Floating Roof Tanks

- For tanks with slotted guidepoles:
  - Gasketed cover, pole wiper, pole sleeve
  - Equip each slotted guidepole having a pole float with a gasketed cover, a pole wiper, and a pole float wiper
U.S. EPA STERPP Agreement

- 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”) technology as an acceptable option.
Flexible Enclosure Technology

- Flexible fabric cover completely encloses the slotted guidepole
- Eliminates vapor emission pathway from inside the tank through the guidepole slots to the outside air
- Removal of pole float allows installation of radar gauge measurement system
  - Better measurement technology
  - Reduces the need to open the hatch for manual gauge measurement
Proposed Rule Amendments

• Require that each slotted guidepole that does not have a pole float be equipped with:
  ▪ SCAQMD approved flexible fabric cover that completely encloses slotted guidepole;
  ▪ Fabric must be UV and petroleum resistant with no holes, slots, or gaps
  ▪ Double clamps at top and bottom of flexible fabric cover
• If technology is used (flexible fabric cover with removal of pole float), must use radar gauge for organic liquid measurement
Proposed Rule Amendments (Continued)

• Update Inspection Procedures
  ▪ Quarterly inspections of flexible fabric cover for tears, cracks, or holes
  ▪ Repairs completed with 72 hours
  ▪ Seeking input on timing of complete replacement if necessary
• Use same notification procedures if inspection indicates a repair is necessary
• Considering a replacement period for flexible fabric covers – seeking input
• Other clarifications to Rule 1178
## Next Steps

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Contact Information

Rule Contact:

Ken Ellis
(909) 396-2457
kellis@aqmd.gov

Mike Morris
(909) 396-3292
mmorris@aqmd.gov