

# Proposed Amended Rule 1178

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WORKING GROUP #2

FEBRUARY 14, 2018

# Purpose of Proposed Amendment

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- Clarify acceptable configurations for control of emissions from slotted guidepoles
  - Specifically identify flexible enclosure system
- Explore mechanisms to minimize permitting impacts
  - Amend Rule 219 to exempt changes to slotted guidepole control configuration

# Revisions to Proposed Rule Language

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- Revising clause (d)(1)(A)(ix) to better reflect acceptable configurations
  - Retains option to control slotted guidepole emissions with gasketed cover, pole wiper, and pole sleeve that was inadvertently removed

## Proposed Language

Equip each slotted guidepole with the following combination of components:

- (A) A gasketed cover, a pole wiper, and a pole float with a wiper or seal; or
- (B) A gasketed cover, a pole wiper, and a pole sleeve that shall be extended into the stored liquid; or
- (C) A gasketed cover, a pole wiper, a pole sleeve that shall be extended into the stored liquid, and a flexible enclosure system

# Revisions to Proposed Rule Language *(continued)*

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- Revising clause (d)(1)(A)(x) to contain pole float operational requirements
  - No additional requirements; revisions only move language from one clause to another

## Proposed Language

Maintain the pole float in a condition such that it floats within the guidepole at all times, except when it must be removed for sampling or when the tank is empty....

# Revisions to Proposed Rule Language (*continued*)

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- Revising clause (d)(1)(A)(xi) to contain flexible enclosure system requirements
  - Correcting proposed language to require flexible enclosure system to be secured to the top of the tank roof
    - Flexible enclosure system should not be able to slide or move at points where it is secured
  - Removing “to eliminate the VOC emission pathway from inside the tank through the guidepole” because similar language already in definition of flexible enclosure system (c)(13)
  - Removing requirement in subclause (d)(1)(A)(xi)(D) that flexible enclosure system be used in conjunction with radar gauging system

## Proposed Language

(C){Flexible enclosure system}Is tightly double-clamped at the top of the guidepole and secured to the tank roof with no visible gaps.

~~(D) Be used in conjunction with a radar gauging system for organic liquid measurement~~

# Revisions to Proposed Rule Language (Continued)

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- Revising subparagraphs (d)(2)(D) and (d)(3)(C) to include acceptable slotted guidepole control configurations
  - Flexible enclosure system is acceptable for domed external floating roof tanks and internal floating roof tanks
  - Tanks that utilize option (iii) will not qualify for Rule 219 exemption
  - To qualify for Rule 219 exemption under option (iii), the addition of a pole sleeve will be necessary

## Proposed Language

Equip each slotted guidepole with the following combination of components:

- i. A gasketed cover, a pole wiper, and a pole float with a wiper or seal; or
- ii. A gasketed cover, a pole wiper, and a pole sleeve that shall be extended into the stored liquid; or
- iii. A gasketed cover, a pole wiper, and a flexible enclosure system

# Revisions to Proposed Rule Language *(continued)*

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- Revising paragraph (h)(2) to include record keeping requirement for flexible enclosure system

## Proposed Language

(h)(2) The operator shall record all inspections of primary, secondary seals, flexible enclosure system (if any), and roof openings on compliance inspection forms...

# Minimizing Permitting Impacts

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- Staff recommending to amend Rule 219 to exempt changes to slotted guidepole configuration where there is no increase in net emissions
  - Will include Rule 219 amendment as part of PAR 1178 rule development with scheduled hearing in April 2018



# Schedule

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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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