Purpose of Proposed Amendment

- 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

- 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)

- 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)

- 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)

- 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)

- 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

- 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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