



## Proposed Rule 1178 Comments Regarding Proposed Rules Regarding OGI Inspections, Reporting & Recordkeeping

R. A. Nichols Engineering would like to provide the following comments on the proposed Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities. R.A. Nichols Engineering works with many of the stake holders for Rule 1178 and we plan to assist our customers to achieve compliance with the new rule conditions when implemented.

R. A. Nichols Engineering supports the AQMD's mission to control fugitive emissions and mass emission generating events and tightening the existing standards to achieve these goals. We believe in incorporating new technologies and tools into new rules to assist industry in compliance and to protect personnel from dangers inherent to Petroleum Facilities. We believe that OGI inspections could be a very useful tool to reduce fugitive emissions and mass emission generating events, especially for fixed roof tanks and are excited to see this technology utilized for this purpose. We believe the current rule language around OGI Inspections still needs additional refinement before implementation. Please see our comments below.

### PROPOSED AMENDED RULE 1178 - FURTHER REDUCTIONS OF VOC EMISSIONS FROM STORAGE TANKS AT PETROLEUM FACILITIES

#### (c) Definitions

(4) COMPONENT INSPECTION is monitoring of a Storage Tank roof and individual components, including but not limited to Roof Openings and Rim Seal Systems, with an Optical Gas Imaging Device and where the person conducting the inspection can clearly view each component through the Optical Gas Imaging Device.

RANE Comment: (d)(1)(D) Specifically states that "Rim Seal Systems are not required to be free of Visible Vapors during a Component Inspection." By including the highlighted language it indicates that Rim Seal Systems need to be monitored but don't trigger reporting or non-compliance?

(42) TANK FARM INSPECTION is monitoring of all applicable Storage Tanks at a Facility with an Optical Gas Imaging Device and where the person conducting the inspection can clearly view the top of the tank shell, and fixed roof or dome, if applicable. Tank Farm Inspections may be conducted at an elevated position, at ground level, or a combination of both.

RANE Comment: If inspection requires the top of the tank shell, and fixed roof or dome be visible and the inspection can be done at ground level, is the use of drones to complete inspection acceptable? Is there a maximum distance that the tank farm can be inspected from?

(47) VISIBLE VAPORS is any vapors detected with an Optical Gas Imaging Device during a Component or Tank Farm Inspection, when operated and maintained in accordance with manufacturer training, certification, user manuals, specifications, and recommendations.

RANE Comment: Are Rim Seals included in this definition, because you state that ALL Visible Vapors must be reported (h)(2)(A). This definition appears to also include any equipment that maybe scanned during a Tank Farm Inspection, even if not covered by this rule?



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### (d) Requirements

#### (1) External Floating Roof Tanks

##### (D) Tank Condition Requirements

The owner or operator of an External Floating Roof Tank shall maintain the tank in a condition that is free of Visible Vapors, except when compliance with subparagraphs (d)(1)(B) and (d)(1)(C) can be demonstrated pursuant to subparagraphs (f)(4)(E). **Rim Seal Systems are not required to be free of Visible Vapors during a Component Inspection.**

RANE Comment: Are Rim Seal findings reportable, do they require record keeping?

### (f) Inspection and Monitoring Requirements

#### (4) Optical Gas Imaging Instrument (OGI) Inspections

Effective January 1, 2024, the owner or operator shall demonstrate compliance with subparagraphs (d)(1)(D), (d)(2)(C), (d)(3)(C) and (d)(4)(C), by conducting OGI inspections in accordance with the following requirements:

(A) Inspections shall be conducted by a person who has completed a manufacturer's certification or training program for the OGI device used to conduct the inspection.

RANE Comment: To understand what is a tank component for documentation, shouldn't the OG Operator be required to be or be accompanied by a Certified Person?

(C) Tank Farm Inspections shall be conducted at least every 7 calendar days since the last Tank Farm Inspection was conducted.

RANE Comment: Process required if inspection is not able to be done within the 7 calendar days? Does an incomplete inspection reset the 7 day timer?

(D) Component Inspections shall be conducted for floating roof tanks according to the following schedules:

(i) In the 3rd month after an inspection required by paragraph (f)(1) for external floating roof tanks.

(ii) Semi-annually for domed External Floating Roof Tanks and Internal Floating Roof Tanks.

RANE Comment: Can the OGI component inspection be done in conjunction with the semiannual 1178 inspection for domed external floating roof tanks and internal floating roof tanks?

(E) Demonstration of compliance with subparagraphs (d)(1)(B), (d)(1)(C), clause (d)(4)(A)(ii)-(iii) or (d)(4)(A)(v), shall be made within 24 hours from when Visible Vapors were detected. If compliance with applicable requirements cannot be demonstrated or is not determined, within 24 hours, the Storage Tank is non-compliant.

RANE Comment: If visible vapors are detected for External Floating Roof Tank with Domed Roof or Internal Floating Roof tank, the language above indicates visible vapors would trigger a Rim Seal inspection per (d)(1)(C), even though the Rim Seal Systems are not required to be free of Visible Vapors per (d)(1)(D). Can the language be changed to specifically require External



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Floating Roof Tanks to comply with (d)(2)(D) and Internal Floating Roof Tanks to comply with (d)(3)(D), the LEL requirements to prove compliance.

(h) Reporting and Recordkeeping Requirements

(2) For OGI inspections required by subparagraph (f)(4), the owner or operator shall:

(A) Report all Visible Vapors to the Executive Officer by phone (1-800-CUT-SMOG or 1-800-288-7664) within 8 hours of detection.

RANE Comment: Are Rim Seal findings, tanks exempt from 1178 or other non-tank visible vapor indications reportable?

(C) Keep records Visible Vapors detected during a Tank Farm Inspection, including tank identification, date of inspection, and findings. Findings shall include identification of tanks from which Visible Vapors were identified, any determinations made pursuant to subparagraph (f)(4)(E), and corrective measures taken, if applicable.

(D) Record all Visible Vapors from tanks for a minimum of 5 seconds. Digital recordings shall be accurately time-stamped and kept on-site for a minimum of 2 years to be made available to the Executive Officer upon request.

RANE Comment: Do visible vapors detected from tanks not covered by Rule 1178 require recordkeeping?

Thank you for reviewing our comments and allowing us to participate in the Rule Development Process.