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Via e-mail at: mmorris@aqmd.gov

Re: SCAQMD Proposed Amended Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities – WSPA Comments on Initial Preliminary Draft Rule Language

Dear Mr. Morris,

Western States Petroleum Association (WSPA) appreciates the opportunity to participate in the Working Group Meetings (WGMs) for South Coast Air Quality Management District (SCAQMD or District) Proposed Amended Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities (PAR 1178). WSPA is a non-profit trade association representing companies that explore for, produce, refine, transport, and market petroleum, petroleum products, natural gas, renewable fuels, and other energy supplies in five western states including California. WSPA has been an active participant in air quality planning issues for over 30 years. WSPA-member companies operate petroleum refineries and other facilities in the South Coast Air Basin that will be impacted by PAR 1178.

SCAQMD released revised initial preliminary draft rule language for PAR 1178 on January 11, 2023.¹ WSPA offers the following comments on the draft rule language.

1. PAR 1178(b), Applicability:

The rule language has been updated to include applicability for

“...all aboveground storage tanks with a Potential For VOC Emissions of 6 tons per year or more...”

In PAR 1178 working group meeting #6, SCAQMD indicated that the applicability was updated to reflect the stringency of US EPA’s Control Techniques Guidelines (CTG) for the Oil and Natural Gas Industry.^{2,3} Because Rule 1178 applies to petroleum facilities, not crude oil production facilities, the requirements of this CTG are not applicable to the facilities regulated under Rule 1178.

¹Proposed Amended Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities: Initial Preliminary Draft Rule Language. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178-initial-pdrl.pdf?sfvrsn=12>.

² SCAQMD PAR 1178 WGM #7, Slide 18. Available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178_wgm7_fin.pdf?sfvrsn=6/

³ US EPA Control Techniques Guidelines for the Oil and Natural Gas Industry. Available at: https://www3.epa.gov/airquality/ctg_act/2016-ctg-oil-and-gas.pdf.

This particular CTG was created to provide recommendations to state, local, and air agencies on what constitutes RACT for sources of VOC emissions in the upstream oil and natural gas industry. In Section 3.1 of the CTG, the oil and natural gas industry is clearly stated to cover oil and natural gas operations involved in the extraction and production of crude oil and natural gas, as well as the processing, transmission, storage, and distribution of natural gas. Oil-related operations include those at the well to the point of custody transfer at a petroleum refinery, but do not include operations that occur at refineries.⁴ Section 3.1 goes on to state that⁵:

“The oil refinery sector is considered separately from the oil and natural gas industry. Therefore, at the point of custody transfer at the refinery, the oil leaves the oil and natural gas sector and enters the petroleum refining sector.”

Additionally, the 6 tons per year applicability threshold was based in part on the 2012 and 2016 NSPS, which also does not apply to petroleum refinery operations.⁶ Subpart OOOOa applies to the Crude Oil and Natural Gas Production source category, as defined in § 60.5430a. The source category is defined as⁷:

- (1) Crude oil production, which includes the well and extends to the point of custody transfer to the crude oil transmission pipeline or any other forms of transportation; and
- (2) Natural gas production and processing, which includes the well and extends to, but does not include, the point of custody transfer to the natural gas transmission and storage segment.

Given that the referenced threshold is not applicable to refineries, WSPA recommends that the PAR 1178 Applicability section be updated for clarity as follows:

Applicability

The rule applies to all aboveground Storage Tanks that have capacity equal to or greater than 75,000 liters (19,815 gallons), are used to store Organic Liquids with a True Vapor Pressure greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions, ~~and all aboveground storage tanks with a Potential For VOC Emissions of 6 tons per year or more,~~ and are located at any Petroleum Facility that emits more than 40,000 pounds (20 tons) per year of VOC as reported in the Annual Emissions Report pursuant to Rule 301 - Permit Fees in any emission inventory year starting with the Emission Inventory Year 2000. In addition, this rule applies to aboveground storage tanks with a Potential for VOC Emissions of 6 tons per year or more located at facilities subject to 40 CFR Part 60 Subpart OOOOa.

⁴ US EPA Control Techniques Guidelines for the Oil and Natural Gas Industry, Section 3.1. Available at: https://www3.epa.gov/airquality/ctg_act/2016-ctg-oil-and-gas.pdf.

⁵ Ibid

⁶ Sources Covered by the 2012 New Source Performance Standards (NSPS) for VOCs and the 2016 NSPS for Methane and VOCs, by Site. Available at: https://www.epa.gov/sites/default/files/2016-09/documents/sources_covered_2012nsps.pdf.

⁷ 40 CFR Part 60 Subpart OOOOa 60.5430a. Available at: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-OOOOa/section-60.5430a>.

2. PAR 1178(c), Definitions:

(c)(7): Emission Inventory Year

WSPA recommends that the definition of Emission Inventory Year be updated as follows:

EMISSION INVENTORY YEAR is the annual emission-reporting period from January 1 – December 31 beginning from July 1 of the previous year through June 30 December 31 of a given year. For example, Emission Inventory Year 2000 covers the period from July 1, 1999 through June 30, 2000.

(c)(45): Visually Leak Free Condition

The definition for Visually Leak Free Condition requires that the rim seal inspection be performed when the tank is “static”. This is very restrictive because tanks cannot always be made static. SCAQMD should consider including roof openings that meet the requirements of the rule in this language. Suggested language is presented below:

VISUALLY LEAK FREE CONDITION is a condition that exists when vapors are not visible or detectable with an Optical Gas Imaging Device when operated and maintained in accordance with manufacturer training, certification, user manuals, specifications, and recommendations. A Visually Leak Free Condition also exists when a Vapor Tight Condition can be demonstrated for the component in which VOC vapors are emitted and detected with an OGI device and when VOC vapors are emitted from a rim seal or roof openings ~~when the tank is static~~ and the rim seals and roof openings meets the requirements of ~~this rule~~ Rule 1178 Attachment A.

Current Rule 1178(c)(45): Waste Stream Tank

SCAQMD has proposed deletion of the definition for Waste Stream Tank. This action was not discussed in any of the rulemaking working group meetings. WSPA would like to understand the reasoning and potential impacts of this change.

(c): Out of Service

WSPA is proposing a new exemption from OGI inspections for tanks that are out of service. WSPA is therefore proposing a new definition be added to Section (c). The suggested definition is presented below:

[New Section]

OUT OF SERVICE means the tank has lost suction, has met the requirements of Rule 1149, and is open to the atmosphere.

3. PAR 1178(d), Requirements:

(d)(1)(C): Rim Seal Requirements

SCAQMD has proposed modifying the gap specifications in section (d)(1)(C)(iii). Rim seals on existing tanks were designed and engineered to meet the gap specifications in the current

rule. Because tanks are not round, if a facility adjusts the rim seal gap on one section of a tank, it could affect the rim seal gap at other parts of the tank. Thus, changing the gap specifications as proposed could potentially result in a refinery being required to completely reengineer both the floating roof and its seal.

Such a proposal would require a complete BARCT analysis, including evaluation of technical feasibility, potential compliance costs, and potential emission reductions benefits. To our knowledge, SCAQMD has not performed this evaluation. Therefore, WSPA recommends that SCAQMD remove the proposed changes to section (d)(1)(C).

(d)(1)(G):

PAR 1178(d)(1)(G) proposes to require an owner or operator to measure and record the TVP of the organic liquid stored in any undomed External Floating Roof (EFR) tank on a monthly basis. This proposal is excessive because the properties of materials stored in the tanks should not significantly change during the year. WSPA recommends the following:

- Require semi-annual testing (not monthly).
- Tanks storing commodities with TVP <0.1 psia are not subject to Rule 1178. Therefore, one-time testing should be sufficient to demonstrate non-applicability.
- In lieu of semi-annual testing, facilities should be allowed to rely on the Safety Data Sheet for the materials stored in the tank.
- In lieu of semi-annual testing, add a provision that data can be obtained from refinery or terminal available data, such as crude oil assays or routine quality control testing, provided the facility is within the SCAQMD.
- In lieu of semi-annual testing, add a provision to allow facilities to refer to the Rule 463 Addendum for use of Initial Boiling Point (IBP) and flash point to determine compliance under certain temperatures for materials at 0.5 psia and 1.5 psia, and allow facilities to opt out of testing for products listed in the Addendum.⁸

WSPA recommends the PAR1178 language be updated as follows:

*An owner or operator shall measure and record the True Vapor Pressure of the Organic Liquid stored in any External Floating Roof Tank where a dome has not been installed pursuant paragraph (d)(1)(E), on a **monthly semi-annual** basis to demonstrate that the True Vapor Pressure of the Organic Liquid stored is 3 psia or less (**annual average basis**). Measurements shall be taken in accordance with the specified test method in paragraph (i)(4). The True Vapor Pressure of shall be determined based on at least one representative sample or multiple samples collected from the top surface layer that is no deeper than six inches. **In lieu of semi-annual testing, facilities may use one of the following methods to establish True Vapor Pressure for a Tank:***

- (i) Safety Data Sheets, or;*
- (ii) Other pertinent refinery or terminal data (e.g. crude oil assays or routine quality control testing, or;*
- (iii) For materials listed in the Addendum to Rule 463, use the temperature, initial boiling point, and flash point to determine compliance for materials at 0.5 psia and 1.5 psia, or;*
- (iv) alternate method approved by the Executive Officer.*

⁸ SCAQMD Rule 463 and Rule 463 Addendum. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-463.pdf>.

Current Rule 1178 (d)(2)(C)(ii):

SCAQMD has proposed deletion of section (d)(2)(C)(ii). This language was recently added to address potential process safety concerns for waste water tanks from accumulation of pyrophoric materials. The new proposal to eliminate that provision was not presented to the Working Group. SCAQMD should retain the current section (d)(2)(C)(ii) language to ensure that waste water tanks can be operated safely.

(d)(4)(A)(1)

SCAQMD has proposed that Fixed Roof Tank emissions be vented to a Fuel Gas System or an Emissions Control System with an overall control efficiency of 98%. The control efficiency in the current rule is 95%. During PAR 1178 Working Group Meeting #7, the District stated that existing operating emission control systems already meet the proposed control efficiency.⁹ WSPA is not aware that the District provided any evidence to support this statement. Current permits are issued based on a 95% control efficiency. If the District intends to update the control efficiency requirement, the technical basis for this update should be provided. WSPA recommends that the language revert back to the current rule language:

The tank emissions are vented to an emission control system with an overall control efficiency of at least 95% by weight or the tank emissions are vented to a fuel gas system.

(d)(5)(C):

PAR 1178(d)(5)(C) requires that the facility submit the American Petroleum Institute (API) 653 internal inspection schedule for EFR Tanks no later than 6 months after the date of adoption. WSPA recommends the language be updated as follows:

Effective [Date of Adoption], submit to the Executive Officer the API 653 internal inspection schedule for any External Floating Roof Tank storing Organic Liquid with a True Vapor Pressure of 3 psia or greater no later than 6 months after [Date of Adoption]. If the API 653 internal inspection schedule changes from what was previously submitted, the owner or operator shall submit to the Executive Officer a revised internal inspection schedule within 90 days of becoming aware of the schedule change.

(d)(5)(D):

PAR 1178(d)(5)(D) requires a facility to comply with the requirements for Internal Floating Roof (IFR) Tanks when the tanks are scheduled for emptying and degassing, but no later than 10 years after becoming subject to the requirements of the rule. This could force an early turnaround of an IFR Tank before its next required API inspection, adding to the cost of compliance. To our knowledge, SCAQMD has not evaluated the impact of such compliance schedule requirements, nor the associated costs to determine whether such a requirement would be cost effective. WSPA recommends the proposed language be updated as follows:

⁹ SCAQMD PAR 1178 Working Group Meeting #7 Presentation. Available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178_wgm7_fin.pdf?sfvrsn=6.

Effective [Date of Adoption], comply with the requirements for Internal Floating Roof Tanks specified in paragraph (d)(3) when the tanks are scheduled for emptying and degassing, ~~but no later than 10 years after becoming subject to the requirements of this rule.~~ Any Internal Floating Roof Tanks that later becomes subject to the rule shall comply with the requirements of paragraph (d)(3) when the tanks are scheduled for emptying and degassing, ~~but no later than 5 years after becoming subject to the rule.~~

4. PAR 1178(f), Inspection and Monitoring requirements:

(f)(4): General Comments BARCT Analysis

The BARCT analysis presented by the District for OGI inspections is not representative of the nature of the inspections presented in the rule language. The District must therefore reassess technical feasibility and cost-effectiveness for OGI inspections.

SCAQMD presented an estimated cost-effectiveness of \$16,900 per ton VOC reduced from weekly third party OGI inspections.¹⁰ The cost estimate used in the cost-effectiveness analysis assumed partial tank monitoring (15 tanks per weekly inspection) and a tank farm overview with an OGI camera. Costs were predicated based on the survey of 15 tanks in one day. As written in the proposed rule language, it simply would not be possible for one inspector to perform OGI inspections of 15 tanks in a day for the following reasons:

- The language in PAR 1178 (f)(4)(B)(i)(A) for individual tank inspections is significantly more prescriptive than described during the working group meetings. The extensive nature of the described inspection will require more time than previously understood.
- There will be safety considerations and physical limitations that need to be addressed, including ladders, wet surfaces, and heat exposure. All of these could potentially result in slip, trip, and fall injuries. Safety concerns must be taken into account as the OGI inspections are performed, again adding to the time it would take to complete a tank inspection.
- While the District mentioned a tank farm overview as being part of the cost-effectiveness analysis, there was no time allocation for the inspector to walk the grounds and stand at an elevated position to obtain a clear view at roof level height of each tank that is not part of the 15 individually monitored tanks. Walking the grounds around all tanks would be a significant additional undertaking.
- Additional time would be required to demonstrate a Visually Leak Free Condition if detection is identified. This demonstration would require deployment of an inspector and supporting crew to conduct inspections as required by Rule 1178 Appendix A.

(f)(4): Comments on Rule Language:

Notwithstanding the previous comments regarding the infeasibility of monitoring 15 tanks in one day and the associated request for SCAQMD to reassess cost-effectiveness and technical feasibility analyses, WSPA offers the following comments on the proposed rule language for OGI inspections:

- SCAQMD should include flexibility to use other monitoring methods, as approved by the Executive Officer, that would be equivalent to OGI inspections.

¹⁰ SCAQMD PAR 1178 Working Group Meeting #5. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par1178-wgm5-final.pdf?sfvrsn=12>.

- PAR 1178(f)(4)(B) would require a facility's inspector to monitor all tanks at a facility with an OGI device at least every 7 calendar days. WSPA recommends that SCAQMD take into account weekends, holidays, and inclement weather in the OGI inspection schedule.
- The requirement to walk the grounds around the tanks and view all tanks at an elevated position is not reasonable and should be removed.
- Some tanks may show evidence of vapors during an OGI inspection, even when the tank is operating in compliance with rule requirements. If a tank is monitored and is found to have vapors, but is operating in compliance, no repairs or adjustments would be made. However, this same result would be expected during the next inspection. A facility would be forced to monitor, assess compliance, and monitor again in an endless cycle. WSPA recommends that language be added to the rule that states that if a detection is identified due to OGI monitoring, the tank shall be deemed compliant if the fixed roof tank meets the vapor tight condition and the floating roof tank meets the applicable requirements, under Rule 1178 Attachment A.
- If no vapors are detected from an individual tank for a year, then OGI monitoring should be reduced to annual monitoring until vapors are detected.
- SCAQMD has not prescribed an implementation timeline for OGI monitoring. OGI monitoring could take up to a year to implement. An implementation schedule should be included in the rule.

WSPA recommends the proposed language be updated as follows:

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

To demonstrate compliance with subparagraphs (d)(1)(D), (d)(2)(C), (d)(3)(C) and (d)(4)(C), an owner or operator of a tank shall conduct OGI inspections in accordance with the following requirements:

(A) The person conducting the inspection shall:

- (i) Complete a manufacturer's certification or training program for the OGI device used to conduct the inspection prior to conducting inspections; and*
- (ii) Operate and maintain the OGI device in accordance with the manufacturer's specifications and recommendations.*

*(B) The inspector shall monitor all tanks at a Facility with an OGI device **or alternate monitoring method as approved by the Executive Officer** at least every 7 calendar days since the last OGI inspection occurred. For each inspection, the person(s) conducting the inspection shall:*

- (i) Individually monitor a minimum of 15 tanks at facilities with more than 15 tanks, and individually monitor all tanks at facilities with 15 or fewer tanks, according to the following:*
 - (A) ~~Monitor all rim seals and Roof Openings, including but not limited to, vents, Roof Legs, Sample Ports, Access Hatches, Guidepoles, and Emission Control System connections. Monitor all visible external tank components by conducting a horizon scan of 15 individual tanks.~~*
 - (B) For facilities with 15 or more tanks, no tank shall be monitored again and counted towards the minimum of 15 tanks until all tanks have had an equal number of OGI inspections.*

~~(ii) Monitor all remaining tanks at the Facility that were not monitored pursuant to clause (f)(4)(B)(i) according to the following:~~

~~(A) Walk the grounds around the tanks to obtain a clear view of each tank;
and~~

~~(B) Stand at an elevated position to obtain a clear view at the roof level height of each tank.~~

~~If a detection is identified due to OGI monitoring the tank shall be deemed compliant if the fixed roof tank meets the vapor tight condition and the floating roof tank meets requirements of Rule 1178 Attachment A.~~

(f)(4)(C) Follow-Up Optical Gas Imaging Inspections

~~(i) A person that meets the requirements of subparagraph (f)(4)(A) shall monitor with an OGI device all sources that were not maintained in a Visually Leak Free Condition and identified during a weekly inspection required by subparagraph (f)(4)(B) during the two weekly inspections immediately following the inspection where the source of a leak was identified. Tanks with components that are imaged after repairs shall not count towards the minimum number of tanks required to be monitored pursuant to clause (f)(4)(B)(ii). Follow-Up Optical Gas Imaging Inspections are not required if fixed roof tanks meet the vapor tight condition and floating roof tanks meet requirements of Rule 1178 Attachment A.~~

~~(ii) If no vapors are detected from an individual tank for a year, then OGI monitoring should be reduced to annual monitoring until vapors are detected.~~

~~(f)(4)(D) In lieu of using an OGI device for inspections required by (f)(4)(B) or (f)(4)(C), a Certified Person may conduct EPA Method 21 measurements for all rim seals systems and Roof Openings. If a Rim Seal System or Roof Opening is inaccessible and measurements cannot be taken using EPA Method 21, an owner or operator shall inspect the rim seal or Roof Opening using an OGI device in accordance with subparagraph (f)(4)(B).~~

(f)(4)(E) Compliance Schedule:

~~The owner or operator of any storage tank subject to the rule on or after [Date of Adoption] shall implement OGI monitoring no later than 12 months after [Date of Adoption].~~

5. PAR 1178(g), Maintenance Requirements

PAR 1178(g) proposes new maintenance requirements in response to deficiencies found during inspections. WSPA recommends that SCAQMD update the allowable timeframe for repairs to 3 calendar days to be consistent with Rules 1173 and 1176. WSPA proposes language be updated as follows:

~~(g)(1) The owner or operator shall repair, or replace any materials or components, including but not limited to, piping, valves, vents, seals, gaskets, or covers of Roof Openings or seals that do not meet all the requirements of this rule before filling or refilling an emptied and degassed storage tank, or within 72 hours 3 calendar days after an inspection, including one conducted by the owner or operator or the contracted third-party as specified in subdivision (f).~~

The proposed rule should specify a timeline for compliance demonstration. WSPA recommends the following language be added to Section (g):

[New Section]

- (g)(2) If a detection is identified on a tank via OGI monitoring, the facility shall complete the following steps in the timeframe provided:*
- (A) Within 7 days of the OGI monitoring, determine compliance with Rule 1178 using the inspection procedures in Attachment A.*
- (B) If the tank is found not to be in compliance with Rule 1178 Attachment A, repair the tank within 3 days.*

6. PAR 1178(h), Record Keeping and Reporting Requirements

SCAQMD is requiring that records of leaks identified with an OGI device include a digital recording of the leak for a minimum of 5 seconds. Capturing an entire tank seal would take at least 30 seconds, requiring 6 MB of storage space per video. Over a period of 5 years, this would require a significant amount of storage space. It is unclear how this video capture will contribute to compliance. WSPA recommends this requirement be struck from the rule language.

(h) Record Keeping and Reporting Requirements

- (1) The owner or operator shall keep records of all inspections required in subdivision (f), including record of inspected tanks, inspection dates, inspection methods, and all findings, including but not limited to the readings measured according to EPA Reference Test Method 21 and leak identified with an OGI device. ~~Records of leaks identified with an OGI device shall include a digital recording of the leak for a minimum of 5 seconds.~~*
- (2) The owner or operator shall record all inspections conducted pursuant to paragraphs (f)(1) through (f)(3) of Primary Seals, Secondary Seals, a Flexible Enclosure System (if any), and Roof Openings on compliance inspection report forms approved by the Executive Officer as described in Attachment A.*
- (3) The owner or operator shall submit all inspection reports for inspections conducted pursuant to paragraphs (f)(1) through (f)(3) and documents to the Executive Officer semiannually within five working days of completion of the inspections specified in paragraph (f)(1) and (f)(2); and on January 31 and July 31, respectively, upon the completion of two consecutive quarterly inspections conducted as specified in subparagraph (f)(3)(B).*
- (4) If the owner or operator determines that a tank is in violation of the requirements of this rule during the inspections specified subdivision (f), the owner or operator shall submit a written report to the Executive Officer within ~~120 hours~~ 5 calendar days of the determination of non-compliance, indicating corrective actions taken to achieve compliance.*
- (5) The owner or operator who elects to install or modify an Emission Control System to comply with the requirement in clause (d)(4)(A)(i) shall conduct an initial performance test as described in clause (f)(3)(A) and submit a complete test report to the Executive Officer no later than 180 days after the effective date of the requirement for new installation; or 180 days after the modification. Subsequent annual performance test*

and test report shall be submitted annually within 60 days after the end of each Emission Inventory Year.

- (6) *The owner or operator shall keep all monitoring, inspection, maintenance, repair records, and sampling results, ~~and digital recordings~~ at the Facility for a period of five years and shall make the records available to the Executive Officer upon request*

7. PAR 1178(j), Exemptions

PAR 1178(j)(4) exempts Fixed Roof Tanks from OGI inspections for weeks that inspections are conducted pursuant to (f)(3)(B). WSPA recommends that similar exemptions be added for External Floating Roof, Internal Floating Roof, and Domed External Floating Roof Tanks.

WSPA recommends the PAR1178 language be updated as follows:

(j)(4)

(A) ~~An owner or operator of a~~ A Fixed Roof Tank shall may be exempt from OGI inspections required by subparagraph (f)(4)(B) for weeks that inspections are conducted pursuant to subparagraph (f)(3)(B). OGI inspections shall resume within 7 days of an inspection conducted pursuant to subparagraph (f)(3)(B).

[New Section]

(B) An External Floating Roof Tank may be exempt from OGI inspections required by subparagraph (f)(4)(B) for weeks that inspections are conducted pursuant to subparagraph (f)(1). OGI inspections shall resume within 7 days of an inspection conducted pursuant to subparagraph (f)(1)(A).

[New Section]

(C) An Internal Floating Roof Tank or Domed External Floating Roof Tank may be exempt from OGI inspections required by subparagraph (f)(4)(B) for weeks that inspections are conducted pursuant to subparagraph (f)(2). OGI inspections shall resume within 7 days of an inspection conducted pursuant to subparagraph (f)(2).

PAR 1178(j) should also include an exemption from OGI inspections for tanks that are out of service.

WSPA recommends the PAR1178 language be updated to include the following:

[New Section]

(j)(6) A Fixed Roof Tank, an External Floating Roof Tank, an Internal Floating Roof Tank, and Domed External Floating Roof Tank may be exempt from OGI inspections required by subparagraph (f)(4)(B) if the subject tank is Out of Service.

WSPA appreciates the opportunity to provide these comments related to PAR 1178. We look forward to continued discussion of this important rulemaking. If you have any questions, please contact me at (310) 808-2146 or via e-mail at rcromartie@wspa.org.

Sincerely,

Rhamine Comate

Cc: Wayne Nastri, SCAQMD
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