Working Group Meeting #3

Proposed Rule 1188 – Vacuum Truck Operations

South Coast Air Quality Management District
Kennard Ellis
July 29, 2014
Agenda

- Introductions
- Preliminary Draft Survey Discussions
- Proposed Draft Rule Revisions
- POTW Related Activity
- Other Discussion Points
- Preliminary Rule Development Schedule
Preliminary Draft Survey Discussions

- Distributed Electronically
- Survey Forms to Address Input From:
  - Affected Facilities
  - Vacuum Truck Operators
- Characterization of Vacuum Truck Industry
  - Types of Material Transferred
  - Volume of Materials Transferred by Type
  - Control Equipment Usage Frequency and Type
  - Truck Inventory
  - Typical Operations vs. Situational / Emergency Activities
  - SCAQMD Permit Status
- Feedback
## Proposed Draft Rule Revisions

<table>
<thead>
<tr>
<th>Issue</th>
<th>Revision</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Definition for True Vapor Pressure (TVP)</td>
<td>Definition Added</td>
</tr>
<tr>
<td>Clarify Subparagraph (c)(17)(B)</td>
<td>Revised to add Clauses (c)(17)(B)(i) and (c)(17)(B)(ii) to provide clarity</td>
</tr>
<tr>
<td>Subparagraph (f)(1)(A) – reference to paragraph (e)</td>
<td>Reference changed to subdivision (e) instead</td>
</tr>
<tr>
<td>Subparagraph (f)(1)(H) – reference to paragraph (a)(16)</td>
<td>Reference changed to paragraph (c)(17)</td>
</tr>
<tr>
<td>Paragraph (h)(3) - Concerns Regarding the Effectiveness of ASTM Method D-86 -11a in Determining the TVP of Crude Oil with High Water Content</td>
<td>Added Option of Using <em>Lawrence Berkeley National Laboratory Test Method for VP of Reactive Organic Compounds in Heavy Oil Using Gas Chromatography</em></td>
</tr>
</tbody>
</table>
POTW Related Activity

- **Characterization Of Vacuum Truck Operations**
  - Types and Frequency of Maintenance Activities
  - Typical Length of Job
  - Number and Type of Trucks Used
  - Exhaust Concentrations
  - Existing Records

- **Field Visits**
  - Observed L.A. County Sanitation District Sewage Line (via Manhole) Cleaning
  - Plan to Schedule Observation of Additional Maintenance Activities

- **Staff To Review Historical Complaint Activity**
Vacuum Truck Operations

- Schedule Site Visits
  - Observe Vacuum Truck Operations
  - Become Familiar with Vacuum Tanks

- Continue to Evaluate Crude Oil
  - Evaluate Survey Data to Estimate
    - Crude Oil Transferred by Vacuum Trucks
    - VOC Emissions Associated with Vacuum Truck Transfers
# Preliminary Rule Development Schedule

<table>
<thead>
<tr>
<th>Item</th>
<th>Action</th>
<th>Target</th>
</tr>
</thead>
</table>
| Vacuum Truck Activities at Affected Facilities | Form Working Group to:  
- Study Vacuum Truck Activities;  
- Conduct Source Testing; and  
- Collect Data and Use to Estimate VOC Emissions | May 2014 thru August 2014 |
| Control Technology Application            |                                                                        |                          |
| Field Visits                              |                                                                        |                          |
| Milestones                                 |                                                                        |                          |
|                                           | Working Group Mtg. #3; Survey Distribution                           | July 29, 2014            |
|                                           | Public Workshop                                                      | Sept. 2014               |
|                                           | Set Hearing                                                          | Oct. 2014                |
|                                           | Final Hearing                                                        | Nov. 2014                |

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