



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

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



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

Item	Action	Target
Vacuum Truck Activities at Affected Facilities	Form Working Group to: <ul style="list-style-type: none"> ▪ 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
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