Working Group Meeting #4

Proposed Rule 1188 – Vacuum Truck Operations

South Coast Air Quality Management District
Kennard Ellis
November 20, 2014
Agenda

- Introductions
- Continuation of Draft Survey Discussions
- POTW Related Activities
- Other Discussion Points
- Preliminary Rule Development Schedule
Continuation Draft Survey Discussions

- Survey 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
Continuation Draft Survey Discussions

- Feedback
  - Met Separately With:
    • Southern California Association of POTWs (SCAP)
    • Western States Petroleum Association (WSPA)
  - Initial Discussions to Highlight and Address Concerns
## Continuation of Draft Survey Discussions

<table>
<thead>
<tr>
<th>Issue</th>
<th>Concerns</th>
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<tbody>
<tr>
<td>Pre-work safety and hazard assessment</td>
<td>Confidentiality</td>
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<tr>
<td>Checklists, procedures or other criteria used to minimize truck</td>
<td>Facilities being responsible for contracted operations and hence resulting in duplication of efforts</td>
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<tr>
<td>emissions or nuisance potential</td>
<td></td>
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<tr>
<td>Information and data reporting period of 12 months</td>
<td>Historical information and data not easily accessible due to lack of requirements to maintain records</td>
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<tr>
<td>(Form 1); footnote: “Other Material” Amend to maintain consistency</td>
<td>Unwarranted level of specificity given that emissions data have not been collected for all the different materials transferred</td>
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<tr>
<td>with rule language and read “other material with water content of</td>
<td></td>
</tr>
<tr>
<td>&lt;90% and total v.p. &gt;25.8mmHg (0.5 psia)”</td>
<td></td>
</tr>
<tr>
<td>Exemption</td>
<td>Establish Exemption Threshold</td>
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Continuation of Draft Survey Discussions

- Final Survey Document to be Distributed
- Submittal Date - January 6, 2015
- Individual Meetings to be Scheduled Leading up to Submittal Date
Other Discussion Points

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

- Conduct Comparison Tests to Evaluate VOC Emissions Associated with Vacuum Truck Transfers Utilizing:
  - Positive Displacement (PD) Pump and
  - Blower

- 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>
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| Vacuum Truck Activities at Affected Facilities | Form Working Group to:  
- Study Vacuum Truck Activities  
- Conduct Source Testing | May 2014 thru January 2015 |
| Control Technology Application | Field Visits  
  Collect Data and Use to Estimate VOC Emissions | January 6, 2015 |
| Field Visits                  | Public Workshop                                         | 1Q 2015                    |
| Milestones                    | Set Hearing                                             | 2Q 2015                    |
|                              | Final Hearing                                           | 2Q 2015                    |

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