

WORKING GROUP MEETING #1  
PROPOSED AMENDED RULE 1178  
FURTHER REDUCTIONS OF VOC EMISSIONS  
FROM STORAGE TANKS AT PETROLEUM  
FACILITIES

**December 12, 2017**  
**SCAQMD Headquarters**  
Diamond Bar, CA



# Background

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- Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II amended in May 2017
  - Adoption resolution directed staff to work with stakeholders to introduce proposed amendments to Rule 1178 to:
    - Incorporate VOC control technologies for guidepoles in floating roof tanks as recognized by U.S. EPA; and
    - Explore mechanisms to minimize permitting impacts when addressing VOC control technologies for guidepoles in floating roof tanks that are subject to the Rule 1178
- Staff is proposing amendments to Rule 1178 to incorporate one additional technology recognized by U.S. EPA in their 2000 Storage Tank Emission Reduction Partnership Program (STERPP) agreement

# Rule 1178 Background

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- Adopted in December 2001
- Amended in April 2006
- Reduce VOC emissions from large storage tanks at petroleum facilities
  - Tank upgrades – roof, seals, fittings
  - Self-inspection and maintenance
  - Compliance reporting

# Rule 1178 Applicability

- Applicability
  - Aboveground petroleum storage tanks  $\geq 19,815$  gals (75,000 liters);
  - Organic liquids with a true vapor pressure  $> 0.1$  psia (under actual storage conditions); and
  - Petroleum facilities  $> 20$  tons per year VOC in any emission inventory year beginning 2000
- Affected facilities
  - Crude petroleum operations
  - Petroleum refining facilities
  - Petroleum bulk stations and terminals



# Current Specifications for Slotted Guidepoles for External Floating Roof Tanks

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- For tanks with slotted guidepoles:
  - Gasketed cover, pole wiper, pole sleeve
  - Equip each slotted guidepole having a pole float with a gasketed cover, a pole wiper, and a pole float wiper

# U.S. EPA STERPP Agreement



- In 2000, U.S. EPA entered into Storage Tank Emission Reduction Partnership Program (STERPP) agreement to reduce emissions from slotted guidepoles
- Current Rule 1178 provisions for slotted guidepoles are acceptable options under the STERPP
- In addition to current Rule 1178 provisions, STERPP recognized flexible enclosure (vapor sock or “slinky”) technology as an acceptable option

# Flexible Enclosure Technology

- Flexible fabric cover completely encloses the slotted guidepole
- Eliminates vapor emission pathway from inside the tank through the guidepole slots to the outside air
- Removal of pole float allows installation of radar gauge measurement system
  - Better measurement technology
  - Reduces the need to open the hatch for manual gauge measurement





# Proposed Rule Amendments

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- Require that each slotted guidepole that does not have a pole float be equipped with:
  - SCAQMD approved flexible fabric cover that completely encloses slotted guidepole;
  - Fabric must be UV and petroleum resistant with no holes, slots, or gaps
  - Double clamps at top and bottom of flexible fabric cover
- If technology is used (flexible fabric cover with removal of pole float), must use radar gauge for organic liquid measurement



# Proposed Rule Amendments *(Continued)*

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- Update Inspection Procedures
  - Quarterly inspections of flexible fabric cover for tears, cracks, or holes
  - Repairs completed within 72 hours
  - Seeking input on timing of complete replacement if necessary
- Use same notification procedures if inspection indicates a repair is necessary
- Considering a replacement period for flexible fabric covers – seeking input
- Other clarifications to Rule 1178

# Next Steps

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Action	Target Dates
Public Workshop	January 11, 2018
Stationary Source Committee	January 19, 2018
Set Hearing	February 2, 2018
Public Hearing	March 2, 2018

# Contact Information

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