

*This Advisory is provided to inform you about activities of the Air District which may affect your operation. It will assist you in your effort to achieve and maintain compliance with applicable air pollution rules and regulations.*

**ATTENTION: OPERATORS OF ORGANIC LIQUID STORAGE TANKS**

**SUBJECT: NEW OPERATIONAL AND REPORTING REQUIREMENTS FOR REGULATION 8, RULE 5, ORGANIC LIQUID STORAGE (REG 8-5)**

On October 18, 2006, amendments were made to [Reg 8-5](#) which may affect compliance at your facility. The following summarizes many of the new options and requirements:

- **Now qualify for up to 48 hours to repair tanks without violation by enrolling in the Enhanced Monitoring Program (EMP) (8-5-119 & 8-5-411):**
  - Operator submits an application listing all tanks subject to Reg 8-5 at a facility;
  - Operator selects 25% of listed tanks and performs twice the normal number of inspections;
  - The remaining 75% of listed tanks remain subject to the normal inspection frequency;
  - An application template is available from [compliance@baaqmd.gov](mailto:compliance@baaqmd.gov) and can be returned there with the title, "Reg 8-5 Enhanced Monitoring Application". Include required data as an electronic table (MS Excel, or similar), per attached sample.

Upon approval of an EMP a limited repair period (up to 48 hours) is available for any listed tank for violations of specific Reg 8-5 standards, provided all exemption conditions in 8-5-119 are met. However, this repair period is not available for violations discovered during District-initiated inspections.

- **The following requirements were effective immediately:**

Control devices (affects fixed roof tanks, smaller tanks & Gas Well tanks)

- Submerged fill pipes are now an acceptable control option on some tanks <19,803 gal (8-5-301)

Source test (8-5-502)

Unless tanks are vented to a fuel gas system or subject to permit-required periodic source testing:

- Emission control systems must be source tested at least once in a calendar year to show an abatement efficiency  $\geq 95\%$  ( $\geq 90\%$  for tank degassing or cleaning abatement devices). A copy of the test report must be kept available.

Good Operating Condition (defined at 8-5-225)

PV valves (8-5-303), external floating roof tanks (8-5-304), internal floating roof tanks (8-5-305), fixed roof and pressure tanks (8-5-307) are all required to be in "Good Operating Condition", i.e., tanks operate "as designed without visible breaks, cracks or other defects that result in organic emissions".

Better Fugitive Controls

Flooded pontoons (8-5-304.6)

External floating roof tanks shall not be operated with organic liquid in any pontoon unless:

- All pontoon openings are sealed within 48 hrs
- Quarterly inspections are conducted on the leaking pontoon until repairs are completed
- Repairs are made to all pontoon leaks when the tank is next removed from service

Records retention (8-5-501.3)

Reg 8-5 records, notifications, reports and submittals shall be retained for at least 24 months.

- **The following requirement was effective 1/1/07:**

Notification of any failure of Reg 8-5 standards discovered during limited exemption period

Failure to meet standards during decommissioning (8-5-111.6) or preventive maintenance & inspection (8-5-112.5) must be reported by telephone within 24 hours of discovery. A written report describing the failure and corrective action must be submitted within 60 days.

- **The following requirements were effective 6/1/07:**

Tank degassing (8-5-328)

- During tank degassing an emission control system shall be operated until four consecutive readings, at intervals of  $\geq 15$  minutes, demonstrate concentrations of  $< 10,000$  ppm
- Tank operators shall notify the District  $\geq 3$  days prior to degassing, except in an emergency.

Pressure Relief Device (PRD) inspections (except PV valves) (8-5-403)

PRD inspections must include verification of the gas tight standard ( $< 500$ ppm, as methane, above background). Documentation of the inspection must be maintained for at least 24 months.

Records for maintenance & inspection exemption (8-5-112.6)

Tank operators must keep the following records for  $\geq 24$  months after each use of the 8-5-112.6 limited exemption:

- Affected tank, date and duration the exemption was used;
- Maintenance and/or inspection that was performed;
- Section of Reg 8-5 for which an exemption was needed;
- Action taken to minimize emissions.

Tank cleaning (8-5-331)

Unless all organic vapors and gases are abated by  $\geq 90\%$  (wt), the following requirements must be met:




- cleaning agents must meet one of the following: initial boiling point  $> 302$  degrees F, **OR** true vapor pressure  $< 0.5$  psia, **OR** VOC content  $< 50$  g/l;
- steam cannot be used to remove scale or film from tank interiors at facilities that operate wastewater treatment unless routine tank cleaning, including sludge removal, has been completed;

Sludge handling (8-5-332)

Sludge removed from a tank, which has been subject to Reg 8-5 at any time since last put into service, must be placed directly into a covered sludge container meeting the following requirements:

- no liquid leakage allowed;
- no measurable gaps exceeding 1.3 cm (1/2 in), except during sludge sampling, treatment, loading or unloading.

**If you have any further needs, contact the air District as indicated below:**

-  For questions about this advisory, contact Eric Pop, Air Quality Specialist, at (415) 749-5172 or [epop@baaqmd.gov](mailto:epop@baaqmd.gov)
-  For a copy of Reg 8-5, see: [www.baaqmd.gov/dst/regulations/index.htm](http://www.baaqmd.gov/dst/regulations/index.htm)
-  For Compliance Assistance, call (415) 749-4999, the Compliance Counselor Hotline

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