



October 17, 2013

Tank Degassing Requirements

This Advisory is provided to inform you about activities of the 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 & DEGASSING CONTRACTORS OF ORGANIC LIQUID STORAGE TANKS

SUBJECT: TANK DEGASSING REQUIREMENTS FOR REGULATION 8, RULE 5, ORGANIC LIQUID STORAGE TANKS

The Bay Area Air Quality Management District's (District) Regulation 8 Rule 5 ([Reg 8-5](#)) prohibits tank operators from opening the interior of an organic liquid storage tank unless the vapor space has been degassed. For tank degassing operations performed within the District, tank operators must complete the following:

Notify

- Tank operators must "provide written notification that is received by the APCO at least 3 days before the start of a degassing operation that is subject to this rule" (8-5-328.3).
- In the case of an emergency, where tank operator is unable to notify the APCO three days before the degas operation, telephone notification must be provided to the APCO "within 8 hours of commencing degassing" (8-5-328.3).

How to Notify

- The District has a Regulation 8 Rule 5 Tank Degas Notification Form (Attached). The form includes all the information required when notifying the District of a tank degas event. The tank owner/operator may generate and submit an alternate notification form providing the same information as the District form.
- All Notifications should be either **faxed** to: (415) 928-0338 (**Subject: 8-5-328 Notification**), or **emailed** to: compliance@baaqmd.gov (**Subject: 8-5-328 Notification**).

Where to Measure

- The readings must be "measured with the instrument probe inlet placed at least 12 inches above the bottom of the tank and above the surface of any sludge material on the bottom of the tank and at least 12 inches inside the tank measured from the inner surface of the tank wall". (8-5-605.2)

Final Four <10,000 ppm

- A tank is considered degassed when organic vapors inside the tank to measure "less than 10,000 ppm as methane for at least four consecutive measurements performed at intervals no shorter than 15 minutes each" (8-5-328.1)

Residual organic concentrations must be measured using a "combustible gas indicator" calibrated to the regulatory standard (10,000ppm as methane) in accordance with [EPA Reference Method 21](#) (40 CFR 60, Appendix A)".

More Information can be obtained from the following sources:

- ☎ For questions regarding this advisory, contact Ed Giacometti, Air Quality Specialist, at (415) 749-8414 or egiacometti@baaqmd.gov
- ☎ For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline
- ☎ For a copy of the above listed rule see www.baaqmd.gov/dst/regulations/#reg8

Wayne Kino
Director of Compliance and Enforcement



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REGULATION 8-5-328

BAAQMD Source #	
Facility Tank #	

TANK DEGASSING NOTIFICATION FORM

(Please Print)

Company:	BAAQMD Plant #	
Address:	City:	Zip:
Contact Name and Title:	Degas Start Date:	
Contractor Name:	Degas Start Time (Estimated):	
Contractor Representative Name:	Contractor Phone #:	

Instrument Information (8-5-605)	Tank Information (8-5-328.3)
Type of Instrument:	Tank Size (in gallons):
Instrument ID#:	Tank Type (IFR/EFR/Fixed Roof):
Date of most recent quarterly calibration:	Product in Tank:
Type of Calibration Gas:	Residual Product Height at Degas(ft/in):
Two Point Calibration Concentrations:	Reason for Tank Degas:

Abatement Information (8-5-502.2)		
Abatement Type:	Abatement Size:	Last Source Test Date:

COMMENTS (optional)

By signing below, I certify the information provided is both accurate and true.

Signature of Tank Operator:	Date:
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INSTRUCTIONS:

- Tank operator shall provide written notification to the APCO received at least 3 days before the start of a degassing operation that is subject to this rule. However, where degassing must be performed on an emergency basis, telephone notification shall be made to the APCO within 8 hours of commencing degassing. (8-5-328.3)
- Unless noted "optional", all fields above must be filled in and the notification must be signed by the tank operator before submitting to APCO.
- Combustible gas indicator calibration and abatement device source test records must be present on-site for verification by the APCO.
- For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline.

Bay Area Air Quality Management District

Frequently Asked Questions

U.S. EPA Reference Method 21

Note: This document contains interpretations of the regulations applicable to EPA Method 21 by BAAQMD staff and is subject to change at any time.

The Bay Area Air Quality Management District (District) Regulations requires combustible gas indicators (CGI) used for the measurement of organic compound concentrations to be "calibrated in accordance with EPA Reference Method 21." Failure to do so may result in a violation of the applicable District, State or Federal Regulation.

What District, State or Federal Regulation is the instrument being used for?

When using a CGI to measure organic compound concentrations, operators must familiarize themselves with all applicable regulatory requirements. The regulation will reference the specification requirements and procedures by which the CGI shall be used to determine compliance.

Does the Regulation site EPA Reference Method 21?

The regulation will have a "procedures" section (generally the 600 section of the District Regulation) that references the specifications, performance requirements and calibration requirements which the handheld instrument should meet. Commonly, the regulation will require a CGI to be used in accordance with EPA Reference Method 21 (Method 21). The operator must then refer to and ensure the instrument meets the requirements of Method 21.

What type of instrument can be used?

In general, most regulations will require the instrument to be a combustible gas indicator which meets the requirements of Method 21. However, some regulations, will specifically list the type of instrument. For example, Regulation 8 Rule 53 Section 601 states, "the portable analyzer shall use flame ionization detection and shall meet the specifications and performance criteria of, and shall be calibrated in accordance with, EPA Reference Method 21 (40 CFR 60, Appendix A)."

What is the Calibration Concentration and Reference Compound?

Method 21 requires the calibration gas to be "a known standard in air at a concentration approximately equal to the applicable leak definition specified in the regulation" (Section 7.1.2). When calibrating a CGI per Method 21, the operator must refer to the applicable regulation and ensure the CGI is calibrated to leak standard cited in the regulation.

Has the instrument been calibrated to the specifications listed in EPA Reference Method 21?

If the applicable regulation requires the instrument to be calibrated according Method 21, the operator must perform an instrument calibration precision check per Method 21 Section 8.1.2 and calibrations per Method 21 Section 10.0.

More Information can be obtained from the following sources:

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For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline

For a copy of the above listed reference method see [EPA Reference Method 21](#)



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