



WORKSHOP NOTICE

September 19, 2008

TO: INTERESTED PARTIES
FROM: EXECUTIVE OFFICER / APCO
SUBJECT: **PUBLIC WORKSHOP - DRAFT AMENDMENTS TO REGULATION 8, RULE 33: GASOLINE BULK TERMINALS AND GASOLINE CARGO TANKS; and REGULATION 8, RULE 39: GASOLINE BULK PLANTS AND GASOLINE CARGO TANKS**

The staff of the Bay Area Air Quality Management District (District) will conduct a public workshop to review and discuss possible amendments to Regulation 8, Rule 33: *Gasoline Bulk Terminals and Gasoline Cargo Tanks* from **9:00 – 11:00 AM on Monday, October 6, 2008**. The Air District will also conduct a public workshop to review and discuss possible amendments to Regulation 8, Rule 39: *Gasoline Bulk Plants and Gasoline Cargo Tanks* from **1:00 – 3:00 PM on Monday, October 6, 2008**. Both workshops will be held in the 4th Floor (West) Conference Room at the District office located at 939 Ellis Street, San Francisco.

BACKGROUND:

The Bay Area Air Quality Management District is considering amendments to both regulations to reduce emissions of organic compounds at gasoline bulk terminals and gasoline bulk plants through improved facility operations and more stringent standards for gasoline cargo tank loading. The Bay Area is not yet in attainment of state ozone standards, so the region must implement all feasible measures to reduce the pollutants that form ozone: nitrogen oxides (NOx) and volatile organic compounds. Control Measure SS-7 of the District's 2005 Ozone Strategy proposed consideration of amendments to both Regulation 8, Rule 33 and Regulation 8, Rule 39 to reduce both liquid and vapor organic emissions.

WORKSHOP DISCUSSION:

Gasoline bulk terminals and gasoline bulk plants are intermediate facilities that distribute gasoline, gasoline additives and other fuels, such as ethanol, by gasoline cargo tanks to service stations and local businesses. Gasoline bulk terminals also distribute refined fuels to gasoline bulk plants.

A majority of the emissions from gasoline bulk terminals and plants are associated with vapor generated from loading gasoline cargo tanks and vapors returned from delivery operations. Cargo tank loading operations may also release emissions through liquid leaks during loading operations and from spilled product. The District estimates that gasoline bulk terminals emit a total of 0.52 tons per day (tpd) of non-methane organic compounds while gasoline bulk plants emit 0.01 tpd. The fugitive emissions from liquid and vapor leaks from piping are not included in these estimates.

Based on District staff's estimate of the emission inventory and review of the existing regulations, the District is proposing amendments to Regulation 8-33 and Regulation 8-39 to reduce organic emissions, enhance the safety of gasoline bulk terminal and bulk plant operations, and improve the enforceability of the rules. The proposed amendments to Regulation 8, Rule 33 include:

- A reduction in the emission limits, and a requirement to monitor vapor recovery system outlet vapor for organic concentrations to ensure the vapor recovery system is operating properly;
- A requirement to install pressure sensors to monitor vapor collection piping backpressure, and activate an alarm if backpressure exceeds 16 inches water column, or an automatic shutdown if backpressure exceeds 18 inches water column;
- A requirement to monitor vapor storage tank airspace emissions to ensure all leaks are discovered and repaired quickly;
- A requirement of vapor check valves in each loading rack vapor collection header;
- A requirement that vapor hose connectors are stored with a vapor connector cap in place to provide a double seal against fugitive emissions;
- A requirement to install sample lines on the pressure and vent sides of inaccessible pressure/vacuum valves to allow immediate access to check for leaks;
- A reduction in the allowable backpressure in new vapor recovery system piping.

Proposed amendments to Regulation 8, Rule 39 include:

- A requirement to install a pressure gauge to monitor vapor collection piping backpressure;
- A requirement of vapor check valves in each loading rack vapor collection header;
- A requirement that vapor hose connectors are stored with a vapor connector cap in place to provide a double seal against fugitive emissions;
- A requirement to install sample lines on the pressure and vent sides of inaccessible pressure/vacuum valves to allow immediate access to check for leaks;
- A reduction in the allowable backpressure in new vapor recovery system piping.

Proposed amendments to both rules also include revised definitions and updated source test requirements.

For copies of the draft amendments to Regulation 8-33 and 8-39 that the District is considering, and a copy of the workshop report, see the District's website at <http://www.baaqmd.gov/pln/ruledev/workshops.htm>. For questions or comments on the potential amendments, please contact Guy A. Gimlen, Air Quality Engineer, at (415) 749-4734 or via e-mail at ggimlen@baaqmd.gov. **Written comments, submitted by U.S. mail or electronic mail, are requested 5:00 pm, Wednesday, October 15, 2008.**

PUBLIC TRANSPORTATION

**MUNI -- #47 AND 49 NORTH AND SOUTH ON VAN NESS AVENUE
#38 EAST AND WEST ON GEARY BOULEVARD/O'FARRELL STREET
BART -- CIVIC CENTER STATION 8TH AND MARKET STREETS**

Attendees are encouraged to ride public transit, rideshare, bicycle, walk or use other non-motorized modes to and from the District.