



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

WORKSHOP NOTICE

July 7, 2011

TO: INTERESTED PARTIES
FROM: EXECUTIVE OFFICER/APCO
SUBJECT: **PUBLIC WORKSHOPS
PROPOSED REGULATION 8, RULE 53:
VACUUM TRUCK OPERATIONS**

The staff of the Bay Area Air Quality Management District (District) will conduct two public workshops to present, discuss, and receive comments on proposed Regulation 8, Rule 53: *Vacuum Truck Operations*. The first workshop will be held from 6 PM – 8 PM on July 21, 2011 in the Martinez City Hall Council Chambers. The second workshop will be held from 2 PM – 4 PM on July 25, 2011, in the BAAQMD 7th Floor Boardroom in the city of San Francisco.

BACKGROUND

The District is considering adopting this regulation to reduce emissions of Total Organic Compounds (TOCs) and Hazardous Air Pollutants (HAPs) from vacuum truck operations. TOC emission reductions will be achieved primarily through the requirement of controls of vapor streams discharged from vacuum truck barrels as well as TOCs that leak from other vacuum truck equipment. The Bay Area is not yet in attainment of state ozone standards, so the District must implement all feasible measures to reduce emissions of pollutants that form ozone, nitrogen oxides (NOx) and volatile organic compounds (VOCs). Control Measure SSM-5 of the District's 2010 Clean Air Plan included consideration of a rule to control VOC emissions from Bay Area vacuum truck operations, which are currently an unregulated source. The measure suggested that VOC emissions could be reduced from vacuum truck operations by requiring carbon adsorption or other control technology.

Staff's analysis of vacuum truck operations verified the feasibility of controlling VOC emissions as well as methane and HAP emissions. Thus, Regulation 8, Rule 53, proposes to control TOC emissions which are defined as VOC plus methane. TOC emission reductions can be achieved by using one of a variety of controls. They include carbon adsorption, liquid scrubbers, internal combustion engines, thermal oxidizers, and refrigerated condensers.

WORKSHOP DISCUSSION

Regulation 8, Rule 53 proposes that Bay Area facilities that operate vacuum trucks or contract for the services of vacuum trucks be responsible for compliance with the proposed requirements. The workshops will review the feasibility of achieving the proposed TOC emission standard from the exhaust of vacuum truck blowers as well as TOC leak standards from related equipment including but not limited to hoses and stingers.

The **proposed limits** for Regulation 8, Rule 53, include the following:

- Exhaust Emission Limit: Vacuum truck pump, blower exhaust or control device shall not emit TOC concentrations that are greater than or equal to 500 ppmv;
- Equipment Liquid Leaks: Components of vacuum trucks such as hoses, connectors, flanges, lines and stingers shall not emit liquid leaks at a rate in excess of three (3) drops per minute; and,
- Equipment Vapor Leaks: Components of vacuum trucks such as hoses, connectors, flanges, lines and stingers shall not emit TOC concentrations that are greater than or equal to 500 ppmv.

Staff does not propose to require controls for vacuum truck operations associated with emergencies such as spills.

The workshops will review the following proposed TOC emission **monitoring requirements** from the blower exhaust of vacuum trucks during loading events:

- Vacuum trucks shall be checked for vapor and liquid leaks prior to and during each loading event;
- Prior to reaching 20% of fill capacity, vacuum trucks would be required to monitor TOC emissions. A second emissions reading would be required prior to reaching 60% of fill capacity;
- When carbon adsorption is used as the primary TOC control, emissions monitoring would be required every 10 minutes after the initial emissions reading is taken; and,
- Emission measurements shall include the date and time of the loading event, the TOC concentration, the material flow rate (in acfm or scfm), and the model of the TOC emission control device.

If a control device is connected to a vacuum truck during a loading event, emissions monitoring would be required to be performed at the exhaust of the control device.

The District proposes the following **recordkeeping requirements** for each vacuum truck loading event:

- Vacuum truck owners/operators would be required to maintain records of TOC emission monitoring readings; and,
- Vacuum truck owners/operators and facilities would be required, within five (5) working days of a request, to submit a list of future scheduled loading events. This will enable staff to schedule an inspection of operations from time to time to determine compliance.

To obtain a copy of the Workshop Report or a copy of the proposed Regulation 8, Rule 53 that the District is considering, see our website at <http://www.baaqmd.gov/Divisions/Planning-and-Research/Rule-Development/Rule-Workshops.aspx>. For questions or comments on the regulatory proposal, please contact Will Saltz, Air Quality Specialist, at (415) 749-4698 or wsaltz@baaqmd.gov. Interested parties are invited to submit comments on the Workshop Report or draft Regulation 8, Rule 53. The deadline for comments is August 15, 2011.

SAN FRANCISCO 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 or walk to and from the workshop.

MARTINEZ CITY HALL COUNCIL CHAMBERS – 1st Floor

525 Henrietta Street, Martinez, CA 94553

URL for Directions: <http://www.cityofmartinez.org/contact/directions.asp>

URL for MAP:

http://maps.yahoo.com/maps_result?ard=1&q1=525+Henrietta+Street%2C+Martinez%2C+CA+94553&fr2=sc-sb&fr=yfp-t-701-s#mvt=m&lat=38.013809&lon=-122.135371&zoom=16&q1=525%20Henrietta%20Street%2C%20Martinez%2C%20CA%2094553

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