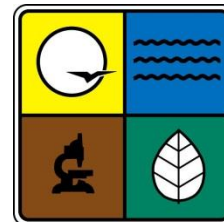


Air Pollution Rules and their Effect on UST/AST Equipment and Compliance

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MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

VAPOR RECOVERY RULES

- MACT 6B and 6C – state wide federal rule
- 10 CSR 10-5.220 – St. Louis ozone non-attainment area rule
- 10 CSR 10-2.260 – Kansas City maintenance area rule

Subparts BBBBBB & CCCCCC (6B & 6C)

- Federal rules affecting gasoline distribution or dispensing facilities
 - 6B
 - Bulk gasoline terminals & plants
 - Pipeline breakout & pumping stations
 - 6C
 - Gasoline dispensing facilities (GDF)

What does 6B Require?

- **Bulk Gasoline Plants throughput > 20,000 gallons per day**
 - Storage tanks > 250 gallons, load using submerged fill (drop tubes)
 - Cargo Tank Loading Racks must also use drop tubes

What does 6B Require?

- ***Bulk Terminals and Pipeline Facilities***
- *Storage Tanks* $\geq$ 20,000 gallons
 - use specified floating roofs and seals or closed vent system
 - **and** control device to reduce emissions by 95%

What does 6B Require?

- ***Bulk Terminals and Pipeline Facilities***
- *Storage* < 20,000 gallons
 - cover the tank with a fixed roof
 - **and** close all openings when not in use

What does 6C Require?

- Monthly throughput of **< 10,000** gallons
 - Minimize spills
 - Cover gasoline containers & storage tank fill pipes with gasketed seal
 - Minimize gasoline sent to open collection systems

What does 6C Require?

- Monthly throughput of $\geq 10,000$ gallons must
 - All of the requirements in previous slide **and**
 - Load all storage tanks ≥ 250 gallons capacity using drop tubes

What does 6C Require?

- Monthly throughput of **$\geq 100,000$** gallons must
 - Meet all of the requirements in previous 2 slides

and

What does 6C Require?

- Operate vapor balance system that either
 - Meets a specified enforceable State, local or tribal rule or permit *-or-*
 - Operates during storage tank loadings, includes specific equipment & work practices & is tested periodically or meets 95% control

ST. LOUIS AREA RULE

- 10 CSR 10-5.220 – *Control of Petroleum Liquid Storage, Loading and Transfer*
- St. Louis ozone non-attainment area; St. Louis City and Counties of Jefferson, St. Charles, Franklin, and St. Louis

10 CSR 10-5.220 REQUIREMENTS

- Storage tanks $\geq$ 40,000 gallons (bulk plants)
- Floating roof system required, OR
- Vapor recovery system

ALSO

- Vapor recovery required for loading of delivery vessels

10 CSR 10-5.220 REQUIREMENTS

- Typical gas dispensing facility (GDF) w/ tanks > 1,000 gallons
- MO/PETP approved stage I system
- MO/PETP approved stage II balance system
- Tanks between 500 and 1,000 gallons have slightly different requirements

ST. LOUIS AREA RULE REVISION

- Remove Stage II (ORVR)
- Replace MO/PETP with CARB certification/testing
- Retain restriction on ASTs > 1,000 gallons
- Require operating permits every 3 years and post construction
- Construction permit for Stage I modification
- Codify fees collected for permitting

Rulemaking Will Not Affect

- Stage I 98% efficiency requirement
- Petroleum storage tank requirements
- Gasoline loading requirements

Tentative Rulemaking Schedule

- Draft rule text/RIR 60-day comment period (ended November 26)
- April 1, 2014, Proposed Rule in MO Register, second comment period begins
- May 29, 2014, public hearing (comment period ends 7 days after this)
- Adoption (summer 2014)
- Rule effective (tentative 4th quarter 2014)

PROBLEMS AND TECHNICAL ISSUES

- Issues with overall operation of the UST/AST system
- Safety concerns
- Where does the rule cause problems
- You are the technical experts, we need your expertise and input to make the rule work for everyone

More Information:

Vapor Recovery/Widespread Use

Web Page:

<http://www.dnr.mo.gov/env/apcp/vaporrecovery/epawidespreaduserule.htm>

- Click on the  Click to receive updates on this issue. to sign up for email updates

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