

ATTACHMENT 2

PUBLIC HEARING ON CERTIFICATION AND TEST PROCEDURES FOR VAPOR RECOVERY SYSTEMS

originally heard on MAY 21, 1998; continued to August 27, 1998

Staff's Suggested Changes to the Original Regulatory Proposal

The following are corrections to Appendix 1 of the Staff Report:

TP.201.3C is incorrectly titled. The correct title is “**Determination of Vapor Piping Connections to Underground Gasoline Storage Tanks (Tie-Tank Test).**”

Before each change below, an outline number and brief description of the change are presented in serif font, followed by the actual change in sans serif font. New text is in shaded font; deleted text is show in ~~strikeout~~ font. Text not changed from the April 3, 1998 proposal is not shown.

The following changes pertain to the certification and test procedures:

Proposed D-200 **Definitions for Certification Procedures and Test Procedures for Vapor Recovery Systems**

1. The definition of “airport refueler” will be changed.

3.5 **Terms Primarily for Cargo Tanks**

“Airport refueler”

is defined as a cargo tank which: has a total capacity no greater than ~~2,000~~ 5,000 gallons; exclusively transports avgas and jet fuel; and is not licensed for public highway use.

Proposed TP-201.3 **Determination of 2 Inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities**

1. Section 3.3, first line, will be changed for clarity.
 - 3.3 The minimum total ullage, for ~~all~~ each individual tanks, shall be 1,000 gallons or 25% of the tank capacity, whichever is less. The maximum total ullage, for all manifolded tanks, shall not exceed 25,000 gallons. These values are exclusive of all vapor piping volumes.

Proposed TP-202.1 **Determination of Emission Factors of Vapor Recovery Systems of Bulk Plants**

1. The test procedure will be amended to allow turbine meters meeting certain specifications be used in place of a positive displacement meter.
 - 5.1 Use rotary type positive displacement meter(s) or turbine meter(s), meeting the requirements of EPA Method 2A, and with a back pressure limit (BPL) less than:
[continued]
2. A procedure will be added for bulk plants which utilize vacuum valves.

8 TEST PROCEDURE

[Continued; add to end of section 8]

When bagging valves, do not seal vacuum valves or the vacuum side of pressure/vacuum valves. On any vacuum valves, use a combustible gas detector according to EPA Method 21 calibrated to the lower explosive limit for methane (21,000 ppm).

Proposed CP-203 Certification Procedure for Vapor Recovery Systems of Terminals

1. Language will be added stating that terminal facilities may be subject to a pretest leak check and different leak limits as specified by district and/or federal rules (40 CFR Part 63, Subpart R National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)).

1.2 Legislative and Regulatory Requirements of Other Agencies

In addition to California's local Districts, other federal, state, or local agencies may have legal jurisdiction regarding vapor recovery systems. The applicant is solely responsible for:

- (1) compatibility of the applicant's equipment with the application of any other agency's test procedures;
- (2) testing of the applicant's equipment with such test procedures; and
- (3) compliance with performance standards and performance specifications in any other agency's regulations referencing such test procedures.

The ARB Executive Officer is not responsible for items (1) through (3) above.

Terminal facilities may be subject to a pretest leak check and different leak limits as specified by district and/or federal rules (40 CFR Part 63, Subpart R National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)).

Proposed TP-203.1 Determination of Emission Factors of Vapor Recovery Systems of Terminals

1. The test procedure will be amended to allow turbine meters meeting certain specifications be used in place of a positive displacement meter.

- 5.1.1 Positive displacement gas meter(s) or turbine meters which shall be sized to avoid adverse effects on the vapor recovery system.

Use rotary type positive displacement meter(s) or turbine meter(s), meeting the requirements of EPA Method 2A, and with a back pressure limit (BPL) less than:
[continued]

2. To ensure consistency with U.S. EPA regulations, the test duration will be a minimum of six (6) hours and the test shall be conducted with a minimum gasoline transfer of 80,000 gallons.

7 PRE-TEST PROTOCOL

[Continued; add to end of Section 7]

To ensure consistency with U.S. EPA regulations, the test duration will be a minimum of six (6) hours and the test shall be conducted with a minimum gasoline transfer of 80,000 gallons.

3. A procedure will be added for testing terminals which utilize vacuum valves.

8 TEST PROCEDURE

[Continued; add to end of Section 8]

When bagging valves, do not seal vacuum valves or the vacuum side of pressure/vacuum valves. On any vacuum valves, use a combustible gas detector according to EPA Method 21 calibrated to the lower explosive limit for methane (21,000 ppm).

Proposed CP-204 Certification Procedure for Vapor Recovery Systems of Cargo Tanks

1. Changes will be made for clarity and consistency.

4 PERFORMANCE STANDARDS, PERFORMANCE SPECIFICATIONS, AND TEST PROCEDURES [continued]

4.1 Performance Standards and Test Procedures [continued]

4.1.3 Internal Vapor Valve

4.1.3.1 Performance Standard [continued]
(1) **Five Minute Performance Standard (Daily Yearly)** [continued]

2. Airport refueler will be redefined.

7 CERTIFICATION [continued]

7.3 Requirements for Determinations of Compliance and Violation [continued]

7.3.2 Specific Requirements [continued]

7.3.2.3 Requirements in Preparation for Pressure Testing continuedd]

“Airport refueler” is defined as a cargo tank which:
has a total capacity no greater than ~~2,000~~ 5,000 gallons; exclusively
transports avgas and jet fuel; and is not licensed for public highway use.
[continued]

Proposed TP-204.1 Determination of Five Minute Static Pressure Performance of Vapor Recovery Systems of Cargo Tanks

1. Changes will be made for clarity and consistency.

9 DETERMINATIONS OF COMPLIANCE AND VIOLATION

Determinations of certain modes of compliance with and violation of certification specifications are outlined below.

9.1 Static Pressure Performance Standard (Five Minute Yearly)

9.1.1 Determination of Compliance

Compliance is determined if the pressure change from Section 8.1.2 or Section 8.2.2 is equal to or less than the limit specified in CP-204 Section ~~4.2~~ 4.1.1.1.

9.1.2 Determination of Violation

Violation is determined if the pressure change from Section 8.1.2 or Section 8.2.2 is greater than the limit specified in CP-204 Section ~~4.2~~ 4.1.1.1.

9.2 Internal Vapor Valve Performance Standard (Five Minute Yearly)

9.2.1 Determination of Compliance

Compliance is determined if the pressure change from Section 8.3.2 is equal to or less than the limit specified in CP-204 Section ~~4.2~~ 4.1.3.1.

Determination of Violation

Violation is determined if the pressure change from Section 8.3.2 is greater than the limit specified in CP-204 Section 4.2 4.1.3.1.

Proposed TP-204.3 Determination of Leak(s)

1. Language will be revised so that specified probe distances are consistent with EPA Method 21.

8.3.1 Probe Distance

~~For a mobile leak source (e.g. cargo tank) the detector probe inlet shall be 2.5 cm from the potential leak source. The distance can be maintained during monitoring by putting a 2.5 cm extension on the probe tip.~~

~~For a stationary leak source (e.g. loading rack) the probe tip shall be placed at the surface of the suspected leak interface except for a rotating shaft for which the probe tip distance shall be 1 cm.~~

The probe tip shall be placed at the surface of the suspected leak interface except for a rotating shaft for which the probe tip distance shall be 1 cm.

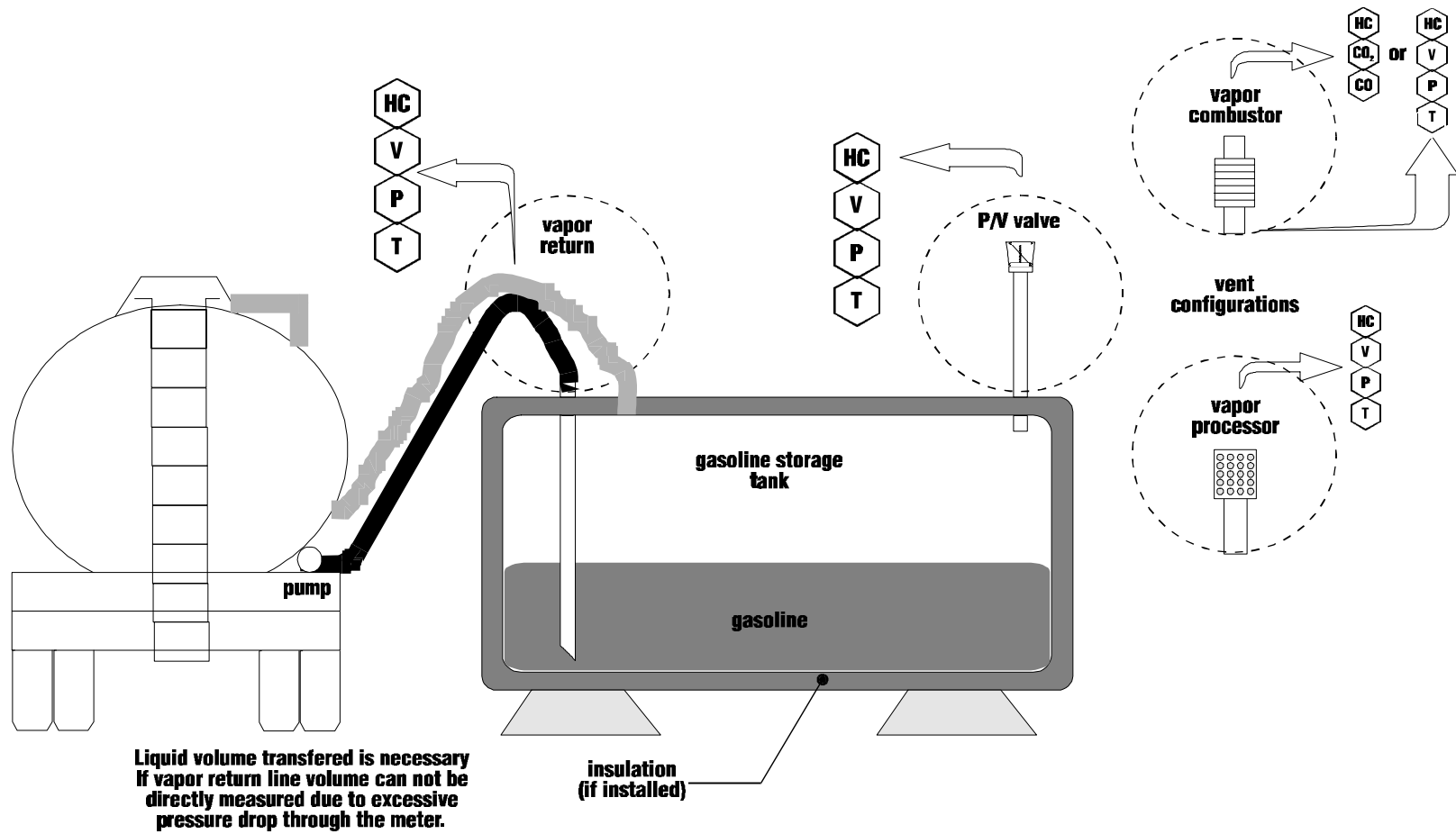
Proposed TP-205.1 Determination of Efficiency of Phase I Vapor Recovery Systems of Novel Facilities

1. Figure 1 will be corrected to show a Phase I test instead of a Phase II test. The caption will also be corrected.

15 **EXAMPLE FIGURES [continued]**

See next page for the corrected figure.

FIGURE 1
Test Locations for Novel Facilities



TP 205.1 E.1/B. CORDOVA '95

