

40 CFR 63 Subpart BBBBBB and CCCCCC

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What are Subparts BBBBBB & CCCCCC (6B & 6C)?

- Generally Available Control Technology (GACT) standards developed by EPA
- Affect gasoline distribution and gasoline dispensing facilities

What facilities do 6B & 6C apply to?

- 6B & 6C gasoline distribution and gasoline dispensing facilities with tanks over 250 gallons
- Requirements based on throughput not tank size
 - 6B
 - Bulk gasoline terminals & plants
 - Pipeline breakout & pumping stations
 - 6C
 - Gasoline dispensing facilities (GDF)

Significant compliance dates

- **May 9, 2008**
 - Initial Notification submittal to the Environmental Protection Agency (EPA)
- **January 10, 2008** or upon startup
 - New Sources in compliance
- **January 10, 2011**
 - Existing Sources in compliance

What does 6B Require?

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

What does 6B Require?

- ***Bulk Terminals and Pipeline Facilities***
- ***Storage Tanks***
 - $\geq 20,000$ gallons throughput
 - use specified floating roofs and seals or closed vent system
 - **and** control device to reduce emissions by 95%
 - $< 20,000$ gallons throughput
 - cover the tank with a fixed roof
 - **and** close all openings when not in use

What does 6B Require?

- ***Others***
 - All Facilities
 - Monthly leak checks by smelling, listening to, and looking at equipment
 - Cargo tanks
 - Vapor tightness test (Method 27) required before loading at bulk terminals with >250,000 gallons/day throughput

What does 6C Require?

- GDF's with 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?

- GDF's with monthly throughput of **< 10,000** gallons
 - Reporting Requirements
 - None
 - Must be able to demonstrate, within 24 hours of request, throughput is below 10,000 gallons per month.

What does 6C Require?

- GDF's with monthly throughput of **$\geq 10,000$** gallons
 - All of the requirements in #1 and
 - Load all storage tanks **≥ 250** gallons capacity using drop tubes

What does 6C Require?

- Monthly throughput 10,000 - 99,000/month
 - Reporting Requirements
 - Kansas City & St. Louis non-attainment/maintenance areas
 - Initial Notification/Notification of Compliance not required

What does 6C Require?

- Monthly throughput 10,000 - 99,000/month
 - Reporting Requirements
 - All other parts of State
 - GDF has compliant drop tubes
 - Submit Notification of Compliance
 - GDF does not have compliant drop tubes
 - Submit Initial Notification
 - Submit Notification of Compliance when drop tubes installed

What does 6C Require?

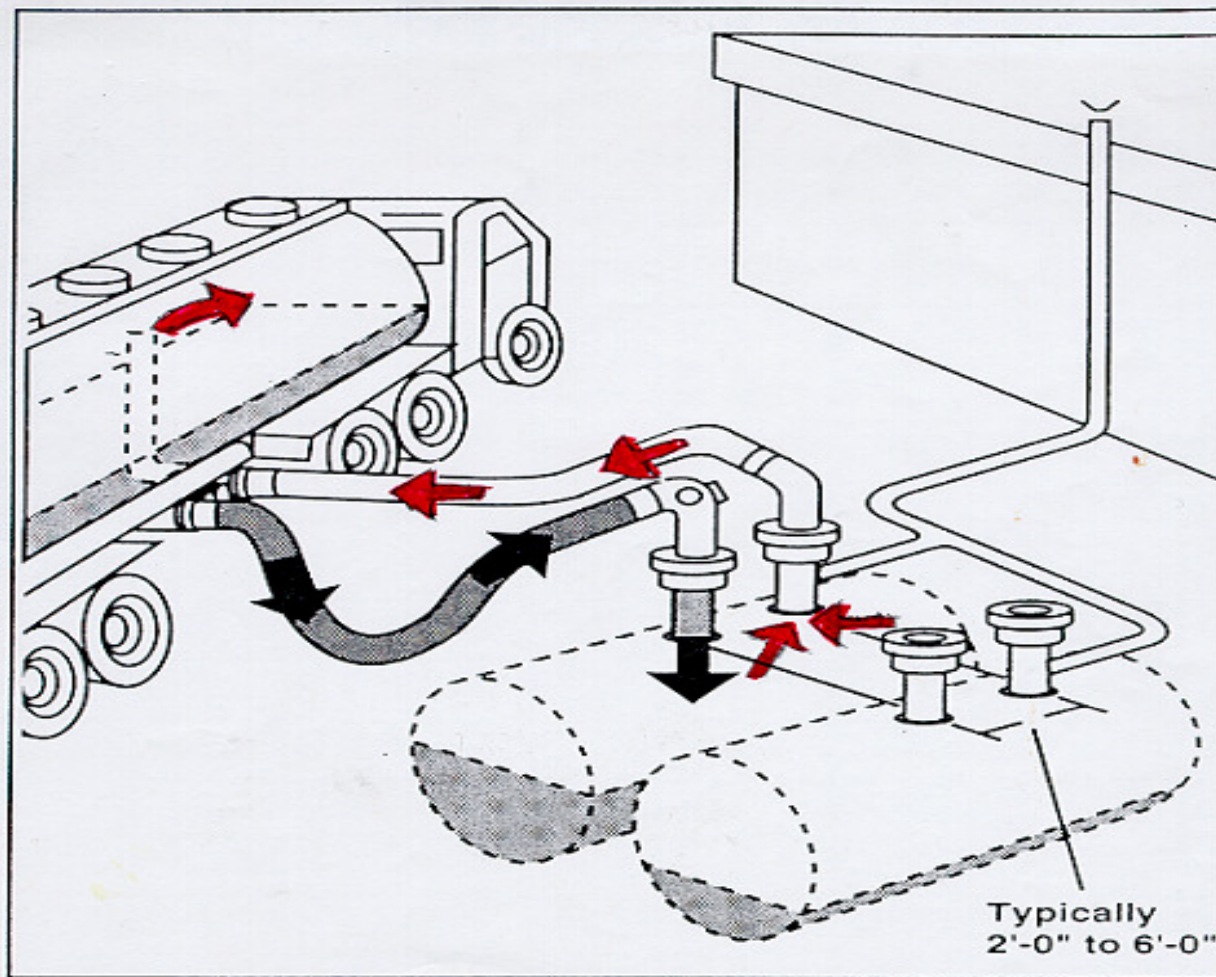
- GDF's monthly throughput of **$\geq 100,000$** gallons
- Meet all of the requirements in #1 and #2 and
- Operate a vapor balance system

What does 6C Require?

- Monthly throughput >100,000 gallons
 - Reporting Requirements
 - St. Louis non-attainment area
 - Initial Notification/Notification of Compliance not required

What does 6C Require?

- Monthly throughput >100,000 gallons
 - Reporting Requirements
 - All other parts of state
 - Determine compliance status
 - Send either Initial Notification or Notification of Compliance
 - **INCLUDES** the Kansas City maintenance area



Two-Point Stage I System

The MOPETP approved Two Point Stage I System showing underground manifolding. The black arrows indicate the product, gasoline liquid; the red arrows indicate the vapors returning to the delivery vessel. This is a mass balance system, powered only by gravity and displacement energies. The chevron above the vent stack indicates the utilization of a pressure/vacuum valve with a 3" w.c. pressure and a 8" w.c. vacuum set points.



What will we do?

- DNR is Still Gathering information
 - IF regulations are adopted implementation & enforcement will be limited by available resources
- APCP is most concerned with Initial Notifications and Notifications of Compliance
- APCP is determining best way to track GDF's statewide

Where can you find more information?

- EPA brochures and initial notification/notification of compliance forms
 - <http://www.epa.gov/ttn/atw/area/arearules.html#imp>
- Air Pollution Control Program, VR/IM Compliance Enforcement Unit Contacts
 - 573-751-4817
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