

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

DATE: AUG 8 1980

SUBJECT: Request for Confirmation of the Definition of a 100-Ton Source as Applied to Controls in the Gasoline Storage and Marketing Chain.

FROM: G. T. Helms, Chief
Control Programs Operations Branch (MD-15)

TO: John L. Hanisch
Mobile Source Emissions Section, Region I

This is in response to your memorandum of May 22, 1980 requesting confirmation of the definition of a 100-ton source as applied to controls in the gasoline storage and marketing chain.

As stated in previous determinations of 100 tons/year sources (see memorandum dated September 7, 1978 from Richard G. Rhoads to Director, Air and Hazardous Materials Division, Regions I-X), the potential emissions from all similar or connected CTG category sources on a facility-wide basis should be added together to determine if CTG control is required. In the case of bulk gasoline terminals, this would be based on potential emissions from tank trucks (using the appropriate emission factor for splash or submerged fill and the loading rack throughput) as well as potential emissions from storage tanks if they are located on contiguous or adjacent properties which are owned or operated by the same person (or by persons under common control).

In accordance with the above, the responses to your questions are: (1) tank truck potential emissions during loading operations should be calculated as part of the potential emissions at gasoline loading terminals; (2) compliance with the storage tank CTGs (fixed-roof tanks and floating-roof tanks) are required at any terminal which has been determined to be a 100-ton/year source and the potential emissions from these tanks should have been considered when this determination was made if the tanks are located on contiguous or adjacent properties which are owned or operated by the same person (or persons under common control); and (3) a tank truck certification program is a requirement only for those urban areas requesting an extension beyond 1982 to attain the ozone standard; however, the bulk terminal CTG requires loading into "essentially leakless" tank trucks and the States must include a test method in their regulations for certifying that tank trucks are essentially leakless regardless of an extension beyond 1982.

As indicated above, Item 3 is in agreement with your understanding, but only "essentially leakless" trucks may be loaded at bulk gasoline terminals if the bulk terminals are greater than 100 tons/year sources. (See memorandum June 16, 1980 from Richard G. Rhoads, Director, CPDD to Jack Divita, Chief, Air Programs Branch, Region VI.)

It is hoped that this will clarify the requirements necessary for the determination if a bulk

gasoline terminal is a 100-ton/year source. Please contact Bill Polglase (FTS 629-5251) or Tom Williams (FTS 629-5226) should you have any questions.

cc: Chief, Air Branch, Regions I-X
Pete Hagerty, Region I
Paul Truchan, Region II
Neil Swanson, Region III
Doug Cook, Region IV
Dick Dalton, Region V
Donna Ascenzi, Region VI
David Doyle, Region VII
Bill Bernardo, Region VIII
Tom Rarick, Region IX
Ken Lopic, Region X