

## Kevin J. Williams

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**From:** Tong, Stanley <Tong.Stanley@epa.gov>  
**Sent:** Wednesday, February 22, 2017 1:56 PM  
**To:** Kevin J. Williams  
**Subject:** Comments on 1/23/17 draft RACT SIP for 2008 8-hour ozone standard  
**Attachments:** RACT SIP 2017.pdf; Hearing Notice RACT SIP - March 2017.pdf; 050538D.PDF

Kevin,

Thank you for the opportunity to comment on Sacramento's draft RACT SIP dated 1/23/2017. Clearly, a lot of thought and work went into the document. As discussed earlier, I have the following comments:

Potential RACT approvability issues:

1. Page C-5, **Rule 448 Gasoline Transfer into Stationary Storage Containers** and Page D-17, **Rule 449 Transfer of Gasoline into Vehicle Fuel Tanks:**

These rules contain a broad exemption for tanks used in husbandry. The exemption, however, should be limited to tanks less than 550 gallons.

Ref: EPA's bluebook, Table 1 references EPA-905/2-78-001 Regulatory Guidance for Control of Volatile Organic Compound Emissions from 15 Categories of Stationary Sources.

<http://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=2000C5M1.PDF>; page 29 limits this exemption to stationary gasoline storage containers of less than 550 gallons.

Also see page 137 in EPA's Model VOC Rules for RACT: [https://archive.epa.gov/ttn/ozone/web/pdf/voc\\_modelrules.pdf](https://archive.epa.gov/ttn/ozone/web/pdf/voc_modelrules.pdf)

2. Page D-12 **Rule 413 Gas Turbines**

Section 113 contains an unapprovable Startup/Shutdown exemption. The Rule should ensure continuous emission limits including during startup/shutdown periods.

Ref: Restatement and Update of EPA's SSM Policy Applicable to SIPs, 80 FR 33839 (June 12, 2015).

<https://www.gpo.gov/fdsys/pkg/FR-2015-06-12/pdf/2015-12905.pdf>

Page 33889 bottom of 1<sup>st</sup> column:

"...the EPA interprets the CAA to prohibit exemptions for excess emissions during SSM events in SIP provisions."

Page 33844 bottom of 1<sup>st</sup> column:

"...SIPs may, rather than exempt emissions during SSM events, include emission limitations that subject those emissions to alternative numerical limitations or other technological control requirements or work practice requirements during startup and shutdown events, so long as those components of the emission limitations meet applicable CAA requirements."

3. Page C-63 **Rule 446 Storage of Petroleum Products**

Section 101's 1.5 psia threshold may not represent current RACT.

Several districts have a 0.5 psia applicability threshold.

Placer 212 (6/9/97)

[https://www.placer.ca.gov/~media/apc/documents/rules/rule\\_212\\_storage\\_of\\_organic\\_liquids%20pdf.pdf?la=en](https://www.placer.ca.gov/~media/apc/documents/rules/rule_212_storage_of_organic_liquids%20pdf.pdf?la=en) ;

Yolo Solano 2.21 (9/14/05)

[https://yosemite.epa.gov/r9/r9sips.nsf/AgencyProvision/F42573F07E0DF90B8825721A0078626B/\\$file/YS+2.21+Clean.pdf?OpenElement](https://yosemite.epa.gov/r9/r9sips.nsf/AgencyProvision/F42573F07E0DF90B8825721A0078626B/$file/YS+2.21+Clean.pdf?OpenElement) ;

Ventura 71.2 (9/26/89) <http://www.vcapcd.org/Rulebook/Reg4/RULE%2071.2.pdf> ;

San Joaquin 4623 (5/19/05) <http://www.valleyair.org/rules/currnrules/r4623.pdf> ; and

South Coast 463 (5/6/05) redline pdf attached. File name: 050538d.pdf .

Please feel free to contact me if you have questions or would like to discuss these comments.

## Stan

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March 8, 2017

Mr. Stanley Tong  
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Dear Mr. Tong:

Thank you for reviewing and providing comments on our proposed RACT SIP. Below are our responses to the comments you made in your email, dated February 22, 2017.

Comment #1: Rule 448, Gasoline Transfer into Stationary Storage Containers and Rule 449, Transfer of Gasoline into Vehicle Fuel Tanks, contain a broad exemption for tanks used in husbandry. The exemption, however, should be limited to tanks less than 550 gallons (based on previous EPA guidance).

Response: The two EPA guidance documents referenced, from 1978 and 1992, recommend that gasoline storage tanks with capacities less than 550 gallons, used for fueling implements of husbandry, be exempt from Stage 1 (a.k.a. "Phase I") vapor control requirements. Although Rule 448 does not limit this exemption to tanks smaller than 550 gallons, it does require that such tanks be equipped with a permanent submerged fill pipe (the EPA guidance does not). In addition, the EPA documents contain no guidance on Phase II vapor recovery, and Phase II is not a CTG category. Rule 449 requires Phase II vapor recovery for the transfer of gasoline into vehicle fuel tanks. We maintain that the combination of Rules 448 and 449 produced emission reductions that exceed those that would be obtained from implementing EPA's guidance.

Comment #2: Section 113 of Rule 413, Stationary Gas Turbines, contains an unapprovable startup/shutdown exemption. The rule should ensure continuous emission limits, including during startup/shutdown periods.

Response: Rule 413 was last amended in 2005. As part of the amendments, we extended the startup period for a gas turbine with a rated output greater than or equal to 160 MW that is part of a combined cycle process. The amendment was based on review of technical information that showed that a shorter startup period for such turbines was not feasible technologically. Emissions during startup and shutdown periods are more than offset by the fact that, outside of these periods, the turbines are required to meet stringent BACT limits from 2 to 3 ppmv of NO<sub>x</sub>, compared to the Rule 413 limit of 9 ppmv.

Although emission limits for startup and shutdown periods are not specified in Rule 413, they are not unlimited. The permits for the turbines contain quarterly emission limits that include all startup and shutdown emissions and are used in determining emission offset requirements.

Comment #3: The applicability threshold in Section 101 of Rule 446, Storage of Petroleum Products, may not represent current RACT. Rule 446 applies to tanks storing liquids with vapor pressures greater than 1.5 psia. Several districts have a 0.5 psia applicability threshold.

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Response: Two CTGs apply to organic liquid storage tanks with capacities greater than 40,000 gallons. EPA-450/2-77-036 applies to fixed-roof tanks and EPA-450/2-78-047 applies to floating roof tanks. In both cases, EPA set a vapor pressure cutoff point of 1.5 psia after considering the costs of controls and their cost effectiveness. EPA concluded that requiring retrofit controls on tanks storing liquids with vapor pressures less than 1.5 psia are beyond RACT, and because the control technology hasn't changed, we believe that EPA's conclusion is still valid today. Although several other California districts have decreased the vapor pressure cutoffs in their rules to 0.5 psia, we consider these provisions to be beyond RACT.

Nevertheless, we reviewed our permit records for storage tanks larger than 40,000 gallons. Most of these tanks are dedicated to gasoline storage, and are subject to the requirements of Rule 446. Fourteen other tanks store organic liquids, such, as transmix (various mixtures of gasoline and diesel), and gasoline/ethanol mixtures with vapor pressures that at times may be between 0.5 and 1.5 psia and at other times greater than 1.5 psia. Because Rule 446 applies to these 14 tanks when they store liquids with vapor pressures greater than 1.5 psia, their permits require them to have controls that meet the requirements of Rule 446 at all times. One additional tank stores ethanol, which has a vapor pressure between 0.5 and 1.5 and is not subject to Rule 446 when storing this material; however, its permit still requires controls that meet the requirements of Rule 446. We have concluded that amending Rule 446 to reduce the vapor pressure cutoff to 0.5 psia would not result in additional emission reductions in our district.

We realize that your comments represent potential approvability issues and do not constitute a formal finding of deficiency. We believe that our analysis demonstrates that we meet federal RACT requirements except for the two deficiencies already identified in our proposed RACT SIP. We have included commitments to correct these deficiencies by adopting two new rules: 1) a rule setting RACT standards for the surface coating of miscellaneous plastic parts, automotive/transportation plastic parts, business machine plastic parts, and pleasure craft, and 2) a rule setting RACT standards for NOx emissions from gas-fired ovens at major sources of NOx.

Please contact me if you would like to have further discussions about our proposed RACT SIP.

Sincerely,



Kevin J. Williams, Ph.D.  
Program Coordinator

c: Andrew Steckel, U.S. EPA Region IX  
Mark Loutzenhiser, SMAQMD