Transmittal of EPA Rule Review Comments

To: Kevin Williams, Sacramento Metropolitan Air Quality Management District
kjwilliams@airquality.org

Mike Guzzetta, California Air Resources Board
mguzzett@arb.ca.gov

From: Andrew Steckel, Rulemaking Office Chief
steckel.andrew@epa.gov


We have completed a preliminary review of the draft rules identified above and have identified no significant concerns. Please direct any questions in this regard to me at (415) 947-4115 or to Alfred Petersen at (415) 947-4118.
Transmittal
of
ARB Staff Rule Review Comments

To: Mr. Kevin Williams,
Program Coordinator
Sacramento Metropolitan Air Quality Management District
Telephone Number: (916) 874-4851
e-mail: kjwilliams@airquality.org

From: Alex Krichevsky, (916) 324-6222
e-mail: akrichev@arb.ca.gov

The following draft rules, which are scheduled for a public workshop to be held by your District staff on January 13, 2009, were received by us on December 12, 2008, for our review:

Rule 448 Gasoline Transfer into Stationary Storage Tanks
Rule 449 Transfer of Gasoline into Vehicle Fuel Tanks

We have reviewed the rules and have the comments on the following page. We believe that our comments are important to the effectiveness and enforceability of Rule 449.

If you have any questions about our comments, please contact Mr. Angus Macpherson, Manager of the Testing and Certification Section, Evaporative Controls and Certification Branch, Monitoring and Laboratory Division at (916) 445-4686.

Rule review comments are on the following page
Air Resources Board Staff Comments on
Sacramento Metropolitan Air Quality Management District
Draft Rules 448 and 449

Rule 448  Gasoline Transfer into Stationary Storage Tanks

We have no comments on this rule.

Rule 449  Transfer of Gasoline into Vehicle Fuel Tanks

1.  **Section 301.1:** Table 4-1 in ARB Vapor Recovery Certification Procedure CP-201 requires 95% by weight control efficiency and an emission factor < 0.38 lb/1000 gal for summer fuel. Therefore, we recommend to change this section to read as follows:

   For summer fuel, a gasoline vapor control efficiency of at least 95% by weight or and a mass emission factor not exceeding 0.38 pounds of gasoline vapors per 1,000 gallons of gasoline dispensed.

2.  **Section 301.2:** Table 4-1 in ARB Vapor Recovery Certification Procedure CP-201 requires 95% by weight control efficiency or an emission factor < 0.38 lb/1000 gal for winter fuel. Therefore, we recommend to change this section to read as follows:

   For winter fuel, a gasoline vapor control efficiency of at least 95% by weight and or a mass emission factor not exceeding 0.38 pounds of gasoline vapors per 1,000 gallons of gasoline dispensed.
Jeffery Yang

From: Carney. Karen [carneyk@SacCounty.NET]
Sent: Thursday, January 15, 2009 3:37 PM
To: Jeffery Yang
Subject: January 13, 2009 SMAQMD Workshop Questions

Follow Up Flag: Follow up
Flag Status: Completed

Jeffery,

Under Rule 448, 306.1, regarding maintenance inspections, how will the owner/operator be able to verify:

• If the spill containment drain valve is vapor tight?
• If the poppet valve is damaged? Should we actually compress it to see?
• If the submerged fill pipe is missing or damaged?

Thank You,
Karen C. Carney
Environmental Specialist
County of Sacramento, Department of General Services
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1/29/2009
From: Kevin J. WILLIAMS
Sent: Friday, January 30, 2009 2:11 PM
To: ALETA KENNARD; Jeffery Yang
Subject: FW: EPA no comment on Sacramento 448 & 449

From: Steckel.Andrew@epamail.epa.gov [mailto:Steckel.Andrew@epamail.epa.gov]
Sent: Friday, January 30, 2009 1:01 PM
To: KEVIN J. WILLIAMS; mguzzett@arb.ca.gov
Cc: alpete99@comcast.net
Subject: EPA no comment on Sacramento 448 & 449

United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

January 30, 2009

Transmittal of EPA Rule Review Comments

To: Kevin Williams, Sacramento Metropolitan Air Quality Management District
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Mike Guzzetta, California Air Resources Board
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From: Andrew Steckel, Rulemaking Office Chief
steckel.andrew@epa.gov

Re: SMAQMD Rule 448, Gasoline Transfer into Stationary Storage Containers; and Rule 449, Transfer of Gasoline into Vehicle Fuel Tanks, draft versions received on January 26, 2009

We have preliminarily reviewed the draft rules identified above and have identified no concerns. Please direct any questions in this regard to me at (415) 947-4115 or to Alfred Petersen at (415) 947-4118.