



Area Source Standards: Gasoline Dispensing Facilities (GDF)

40 CFR Part 63, Subpart 6C

<http://www.iowadnr.gov/InsideDNR/RegulatoryAir/AreaSourceToxicsNESHAP>

6C – NESHAP Applicability

- ▶ Gasoline pumped into fuel tank of motor vehicle, nonroad vehicle, or nonroad engine
- ▶ Applies to **any** facility where gasoline is dispensed (not just commercial stations)
- ▶ Requirements depend on the monthly actual gasoline throughput
- ▶ Air permits are not required currently, for facilities not in Linn or Polk Counties

6C – NESHAP Requirements

“Small” GDF ($<10,000$ gal/month)

- Best management practices (BMP) for gasoline vapor and spills

“Medium” GDF (10,000 – 100,000 gal/month)

- BMP
- Submerged fill (drop tube) for tanks

“Large” GDF ($\geq 100,000$ gal/month)

- BMP
- Submerged fill for tanks
- Stage 1 vapor balance system
- Initial & periodic pressure and vapor tightness testing

6C – Throughput Questions

How does a GDF calculate monthly gasoline throughput?

- ▶ Monthly throughput is calculated by adding the volume of gasoline loaded into or dispensed from all gasoline storage tanks located at a GDF facility *during the current day* plus the total volume of gasoline loaded into or dispensed from all gasoline storage tanks at the GDF for *the previous 364 days* and then dividing that sum by 12.

If a GDF goes over 100,000 gallons per month, does VRS need to be installed immediately?

- ▶ If the facility first went over 100,000 gallons per month after January 10, 2011, it has three years to comply.

6C – Throughput Questions

Are gasoline/ethanol blends, including E10, E15, and E85 included in the monthly throughput calculations for GDFs?

- ▶ Yes, EPA has characterized the vapor pressure of gasoline/ethanol blends up to and including E85 as being gasoline for purposes of the 6C NESHAP.

Is diesel kerosene, avgas (aviation fuel), jet fuel, new oil, or waste oil included in the monthly throughput calculations?

- ▶ No.

6C – Equipment Questions

Are coaxial systems still allowed for new tanks?

- ▶ Yes, but the GDF would need to choose “compliance alternative” and do a volumetric efficiency test to demonstrate 95% efficiency.

Where in the rule does it say that poppet valves are required for co-axial VRS?

- ▶ The rule doesn't specify “poppet valve;” the rule just says “valve that seals upon disconnect.” EPA has determined that means a poppet valve is necessary.

6C – Compliance Questions

What should a GDF do if it hasn't installed poppet valves?

- ▶ Contact DNR about setting up a compliance schedule. The schedule should include timelines for conducting the necessary testing after the poppet valve is installed.

What if there is a problem with VRS equipment failure, such as vent cap gasket seals corroding or corrosion of VRS equipment used for ethanol blends?

- ▶ Any equipment problems causing the VRS system not to be vapor and leak tight as required under the rule must be repaired in a timely manner.

6C – Compliance Questions

What will happen if an inspector finds that a GDF isn't complying with NESHAP requirements?

- ▶ Typically, facilities will be given 60 days to correct the problem. The DNR will likely send a Notice of Violation if a violation is not corrected within 60 days. The DNR will determine on a case-by-case basis whether additional enforcement action, including a penalty, is warranted.

6C – Testing Questions

What if a GDF fails a VRS test required under the rule?
If a repair is made immediately and a follow-up test shows compliance, does the failed test need to be reported?

- ▶ All failed tests must be reported to the DNR, even if a follow-up test shows compliance.

How often is testing required by the NESHAP?

- ▶ Initially, and every three years.

6C – Testing Questions

Does a VRS test demonstrating compliance with the rule (passing) need to be reported to the DNR?

- ▶ Yes, facilities are required to submit a notification to DNR within 60 days after the test, indicating whether compliance with the rule was demonstrated.
- ▶ The full test report does not need to be submitted, unless the facility has chosen the “compliance alternative.” In that case, the report from the volumetric efficiency test needs to be submitted.

Questions?

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