

## Frequently Asked Questions (FAQs)

*Why is a poppet valve or equivalent device required on coaxial systems?*

The 6C NESHAP requires, under Table 1 in the regulation, that "a) All vapor connections and lines on the storage tank shall be equipped with closures that seal upon disconnect; and b) The vapor line from the gasoline storage tank to the gasoline cargo tank shall be vapor-tight, as defined in §63.11132."

EPA recently made a determination that a cap alone placed on the end of a coaxial system would not meet these 6C requirements. Although a cap will prevent vapors from escaping, there is a brief period of time that elapses between when the coaxial system is disconnected from the gasoline cargo tank and when the cap can be replaced. During this period, vapors escape from the end of the system into the atmosphere because the pressure in the tank is usually above atmospheric pressure. Therefore, a poppet valve (or equivalent device which seals upon disconnect) is required for coaxial systems under the 6C NESHAP.

*What if the owner or operator of a large GDF cannot comply with the 6C equipment or testing requirements by January 10, 2011?*

An owner or operator of a large GDF that will not be in compliance with the 6C NESHAP by January 10, 2011, should notify the DNR as soon as possible and must also submit a compliance schedule. At minimum, the compliance schedule will need to identify the work that will be done at the facility, the date this work is expected to commence, and the date they expect to be fully in compliance with the rule. The schedule will need to be submitted by the facility, and be signed by someone acting as Responsible Official for the facility/company.

The DNR has created a form that facilities may use to notify the DNR of non-compliance and to submit their compliance schedule. The form is available at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/AreaSourceToxicsNESHAPs.aspx> (under Gasoline NESHAP). Facilities with questions about 6C compliance should contact Diane Brockshus at [diane.brockshus@dnr.iowa.gov](mailto:diane.brockshus@dnr.iowa.gov) or by phone at (515) 281-4801.

Owners and operators with compliance questions regarding facilities in Polk or Linn Counties should contact their local air program offices: Polk County Public Works (Air Quality Division), by phone at (515) 286-3351, or Linn County Public Health (Air Quality Division), by phone at (319) 892-6000.

*What method must a GDF owner or operator use to calculate monthly gasoline throughput to determine whether the GDF exceeds the 100,000 gallon/month threshold?*

EPA proposed amendments to 6C in December 2009 that clarified the method for calculating monthly gasoline throughput. Although EPA has not yet finalized these amendments, the DNR has been recommending that GDF owners and operators use EPA's proposed method to calculate monthly throughput, as follows:

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.

Contact the DNR for additional guidance on how to use the monthly throughput calculation.

*What types of gasoline blends are included under 6C?*

At this time, all gasoline blends, including ethanol blends up to 85% ethanol, are included in the 6C

definition of gasoline. Diesel, propane and other fuels are not covered under 6C, and do not need to be included in the monthly throughput calculation.

*Are gasoline bulk plants or bulk terminals covered under 6C?*

Gasoline bulk distribution is covered under a different NESHAP (40 CFR 63, Subpart BBBBBB (6B)). The compliance date for 6B is also January 10, 2011. More information is available at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/AreaSourceToxicsNESHAPs.aspx>. Those with questions may also contact Christine Paulson at [christine.paulson@dnr.iowa.gov](mailto:christine.paulson@dnr.iowa.gov) or by phone at (515) 242-5154, or contact Diane Brockshus at [diane.brockshus@dnr.iowa.gov](mailto:diane.brockshus@dnr.iowa.gov) or by phone at (515) 281-4801.

**DNR UST Requirements for Large GDF and other GDF**

Owners and operators of GDF may have additional obligations under DNR UST regulations. 6C NESHAP reports submitted to the DNR Air Quality Bureau will be provided to DNR UST. However, GDF owners and operators should contact the DNR UST section with any questions regarding these requirements. Please contact Tom Collins at [tom.collins@dnr.iowa.gov](mailto:tom.collins@dnr.iowa.gov) or by phone at (515) 281-8879 or Paul Nelson at [paul.nelson@dnr.iowa.gov](mailto:paul.nelson@dnr.iowa.gov) or by phone at (515) 281-8779.