

Gasoline Dispensing Rule: Compliance Deadline is Jan. 10

The DNR reminds owners and operators of gasoline dispensing facilities that the compliance date for the Environmental Protection Agency's "6C NESHAP" gasoline dispensing rule is January 10, 2011. The official name for this rule is the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories: Gasoline Dispensing Facilities (40 CFR Part 63, Subpart CCCCCC).

The purpose of the 6C NESHAP is to reduce the emissions of hazardous air pollutants (HAPs) to the environment and to protect public health. EPA estimates that full implementation of 6C will result in national emissions reductions of 50,000 tons annually of volatile organic compounds, which will also eliminate over 4.5 million pounds annually of HAP emissions, such as benzene.

The 6C NESHAP applies to existing or new gasoline dispensing facilities (GDF) that are area sources.* Examples of GDF include service stations, convenience stores, car rental agencies, and motor pools. The rule requirements affect each gasoline cargo tank during the delivery of product to a GDF and also affect each gasoline storage tank. The equipment used for refueling of motor vehicles (gasoline pumps) are not covered under 6C.

* *An area source is a facility that is not a major source of hazardous air pollutants (HAP). A major source is a facility that has the potential to emit 10 or more tons per year of any single HAP or 25 or more tons per year of any combination of HAP.*

Since EPA finalized 6C in early 2008, DNR staff from air quality, underground storage tanks (UST), and its field offices have been providing outreach to affected facilities, associations, and other affected parties. DNR activities included meetings with, presentations for, and individual compliance assistance for service stations and convenience stores, UST installers, testers and third party inspectors, Petroleum Marketers and Convenience Stores of Iowa (PMCI) and other interested stakeholders.

All existing GDF facilities must be in compliance with the 6C requirements, including any required emissions control, testing, recordkeeping and reporting, by **January 10, 2011**. Owners and operators of facilities that will not be in compliance by that date should follow the instructions in the Frequently Asked Question (FAQ) answers below for submitting a compliance schedule to the DNR.

If you are unfamiliar with the 6C NESHAP and think that it may affect your facility, company, customers or members, please read the information below on the 6C NESHAP, DNR Air Quality requirements, available online tools, and answers to FAQs.

Gasoline Dispensing Facilities Overview of 6C NESHAP and Frequently Asked Questions

The Iowa Department of Natural Resources (DNR) has 6C NESHAP tools and resources on its website at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/AreaSourceToxicsNESHAPs.aspx> (under Gasoline NESHAP).

U.S. EPA has delegated 6C authority to the DNR, which means that DNR is the primary implementation and enforcement agency in Iowa. For facilities within Polk or Linn counties, the approved local air programs are implementing and enforcing 6C. Polk and Linn counties may have different procedures for GDF permitting and registration or for 6C compliance. Please contact the local air programs directly for more information: Polk County Public Works (Air Quality Division), phone: (515) 286-3351; or, Linn County Public Health (Air Quality Division), phone (319) 892-6000.

Summary of 6C NESHAP Requirements

Under 6C, EPA has established three categories of facilities based on monthly gasoline throughput. Requirements for small and medium size GDFs are similar to those already established many years ago under state and federal regulations for underground storage tanks and public safety/flammable liquids. The most significant new requirements are for large GDFs, which have to install and test vapor control equipment not previously required in Iowa.

In brief, 6C equipment and operation requirements* include:

- **Small GDF** (gasoline throughput less than 10,000 gallons/month (g/m)): Good management practices, including minimizing gasoline spills, covering containers and storage tank fill pipes with gasketed seals, and minimizing gasoline that is sent to open collection systems.
- **Medium GDF** (gasoline monthly throughput at or above 10,000 g/m but less than 100,000 g/m): Meet all requirements for small GDF and also load all storage tanks using submerge fill (drop tubes).
- **Large GDF** (gasoline monthly throughput at or above 100,000 g/m): Meet all requirements for small and medium GDF, and also:
 - **Install and operate a vapor balance system (or stage 1 vapor recovery)** for storage tank loadings according to 6C specifications;
 - **Install and operate a "poppet valve" (or equivalent device which seals upon disconnect)** on the end of a coaxial system when it is disconnected from the gasoline cargo tank (see FAQ below for more information);
 - **Conduct initial and periodic performance testing** according to 6C specifications, including leak rate, cracking pressure and static pressure performance testing;
 - **Submit the required 6C Compliance Information form** or equivalent information to the DNR Air Quality Bureau (see below for more information).

* *This summary is intended as a guide and is not a substitute for reading the 6C NESHAP. The regulation is available on EPA's website at <http://www.epa.gov/ttn/atw/gasdist/gasdispg.html> and at <http://www.epa.gov/ttn/atw/area/compilation.html>*

6C Compliance Information

Owners and operators of large GDFs must submit documentation to the DNR Air Quality Bureau that they have completed vapor balance system installation and testing. The DNR has developed a form that owners and operator may use to fulfill this requirement. The new form, 6C Compliance Information, is available at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/AreaSourceToxicsNESHAPs.aspx> (under Gasoline NESHAP).

Owners and operators of large GDFs must submit a completed 6C Compliance Information form or equivalent information to the DNR Air Quality Bureau once they have complied with the 6C NESHAP requirements. The DNR is requesting that facilities submit this information by **March 11, 2011**. Owners and operators must ensure that the 6C Compliance Information form or letter is signed by someone acting as Responsible Official for the facility/company, and should mail, fax or e-mail the information to the DNR Air Quality Bureau. Companies with multiple locations may submit one 6C Compliance Information form or letter signed by the Responsible Official and attach a table or spreadsheet summarizing the general information, 6C applicability, and compliance status for each facility. The DNR form provides additional instructions for submitting the required information.

What if I already notified DNR UST of my vapor balance installation and testing?

To ensure that DNR's NESHAP records are complete and available for any EPA information requests, the DNR asks that all owners or operators of large GDF submit the required 6C Compliance Information to the DNR Air Quality Bureau. The DNR Air Quality Bureau will accept a copy of a

previously submitted UST form in place of a 6C Compliance Information form, provided that: 1) the UST form was submitted **after** the installation and testing of vapor balancing equipment, and 2) the UST form has been signed by someone acting as Responsible Official for the facility/company.

Those with questions may also contact Christine Paulson at christine.paulson@dnr.iowa.gov or by phone at (515) 242-5154, or contact Diane Brockshus at diane.brockshus@dnr.iowa.gov or by phone: (515) 281-4801.