

6C NESHAP Frequently Asked Questions

(Originally posted January 2011; revised June 2013)

1. 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."

In 2010, EPA 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.

2. 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.

3. Does the 6C NESHAP rule apply only to commercial gasoline dispensing facilities (GDF)?

No. The rule applies to all GDF that dispense gasoline to any internal combustion engine. This includes, but is not limited to, residential, agricultural, or other private GDFs, as well as industrial, company, governmental, or institutional GDFs.

4. How is the rule likely to affect non-commercial GDF?

EPA estimated that most non-commercial GDF are likely to be "small" GDF (monthly gasoline throughput less than 10,000 gallons), and would have only basic housekeeping requirements under the rule.

5. Does the rule apply only to GDF with underground storage tanks (UST)?

No. The rule applies to all GDF that dispense gasoline to any internal combustion engine, regardless of the tank type. It includes both UST and above ground storage tanks (AST). Most AST are located at bulk gasoline distribution facilities, such as bulk plants, bulk terminals, and pipeline facilities.

6. 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 was January 10, 2011. More information is available at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/AirToxics-NESHAP.aspx>. Those with questions may also contact Diane Brockshus at diane.brockshus@dnr.iowa.gov or by phone at (515) 725-9514.

7. 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 or by phone at (515) 281-8879 or Paul Nelson at paul.nelson@dnr.iowa.gov or by phone at (515) 281-8779.