

## Bulk Gasoline Distribution Requirements - Overview and Frequently Asked Questions

The DNR has 6B NESHAP tools and resources on its website at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/AirToxics-NESHAP.aspx> under Gasoline (area sources).

U.S. EPA has delegated 6B 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 6B. Contact the local air programs directly for more information: Polk County Public Works (Air Quality Division), phone: (515) 286-3705; or, Linn County Public Health (Air Quality Division), phone (319) 892-6000.

### Frequently Asked Questions (6B NESHAP and Iowa permitting requirements)

*What is the difference between a bulk gasoline terminal and a bulk gasoline plant, and why do owners and operators of bulk plants need to apply for permits?*

Under 6B, all area source bulk gasoline distribution facilities must check for leaks and use management procedures to prevent evaporation of gasoline. Additionally, bulk plants, bulk terminals, and pipeline breakout stations must use submerged fill (drop tubes) or bottom fill to load gasoline into storage tanks, tank trucks and railcars. Submerged fill tubes installed after November 9, 2006, including retrofits, must extend to within 6 inches of the bottom of the storage tank, tank truck, or railcar.

Under 6B, bulk gasoline plants with a throughput less than 20,000 gallons per day are subject to less stringent regulatory requirements for storage tanks and loading racks than the larger bulk gasoline terminals. EPA requires that throughput be calculated from the maximum design capacity of the facility unless enforceable throughput limits are in place. It is beneficial for bulk gasoline plants to obtain an air construction permit from the DNR to limit gasoline throughput below the 20,000 gallons per day threshold if such a limit is practical.

Most bulk gasoline terminals, pipeline breakout stations and pumping stations already have air construction permits.

*Why must an owner/operator of a bulk gasoline plant apply for a DNR construction permit, and by when?*

A bulk plant owner or operator must apply for an air construction permit prior to the 6B compliance date of **January 10, 2011**, to ensure that the plant is correctly classified under 6B as a "bulk gasoline plant" and not a "bulk gasoline terminal."

The DNR has developed new permit templates to make it easier for facilities to obtain a throughput limit of 20,000 gallons per day or less. By completing this template and limiting throughput, the facility will be classified as a "bulk gasoline plant" and will be subject to the less stringent 6B requirements. By obtaining a permit, a bulk plant owner/operator will also fulfill the 6B requirement for submitting a Notification of Compliance Status. Permit Templates and 6B materials can be found on the DNR's Air Quality website at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/AirToxics-NESHAP.aspx> under Gasoline (area sources) and at UNI's website at <http://iwrc.org/services/iaeap/gasoline-neshap-6b/>.

*What if a bulk plant owner or operator does not submit a permit application by the January 10 deadline?*

An owner or operator of a bulk plant should submit the required permit template to the DNR as soon as possible. Permit application forms are available at the DNR and UNI websites noted above.

If an owner or operator wishes to make arrangements for submitting an application after January 10, please contact John Curtin at [john.curtin@dnr.iowa.gov](mailto:john.curtin@dnr.iowa.gov) or by phone: (515) 725-9522. Facilities within Polk County or Linn County must obtain the required permits through their local air program offices (Polk County, phone (515) 286-3705, or Linn County, phone (319) 892-6000).

*What if a bulk plant or bulk terminal cannot comply with the submerged fill/bottom fill<sup>1</sup> requirements or other 6B requirements by January 10?*

An owner or operator of a bulk plant, bulk terminal or other bulk gasoline distribution facility that will not be in compliance with 6B 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 the facility expects 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/AirToxics-NESHAP.aspx> under Gasoline (area sources). Facilities with questions about 6B compliance should contact Diane Brockshus at [diane.brockshus@dnr.iowa.gov](mailto:diane.brockshus@dnr.iowa.gov) or by phone at (515) 725-9514.

Owners and operators of facilities in Polk County or Linn County should contact their local air program offices: Polk County Public Works (Air Quality Division), by phone at (515) 286-3705; or Linn County Public Health (Air Quality Division), by phone at (319) 892-6000.

*If I am the owner or operator of a bulk gasoline terminal, pipeline breakout station or pumping station, what more do I need to do?*

All bulk gasoline distribution facilities must be in compliance with applicable 6B requirements by January 10, 2011. Owners and operators of terminals, pipeline breakout stations and pumping stations must also submit a Notification of Compliance Status to the DNR by January 10, 2011, or as soon as possible thereafter. There is not a DNR form for the 6B Notification of Compliance Status. The facility owner or operator should send a letter to the DNR, signed by someone acting as a Responsible Official, indicating how the facility has complied with the 6B NESHAP. Owners and operators of facilities that will not be in compliance with all 6B requirements by the compliance date should follow the directions above for submitting a compliance schedule to the DNR.

*Are gas stations or other gasoline dispensers covered under 6B?*

Gasoline dispensing facilities such as gas stations are covered under a different NESHAP (40 CFR 63, Subpart CCCCCC (6C)). The compliance date for 6C is also **January 10, 2011**. More information is available at <http://www.iowadnr.gov/InsideDNR/RegulatoryAir/AirToxics-NESHAP.aspx> under Gasoline (area sources). 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) 725-9510, or contact Diane Brockshus at [diane.brockshus@dnr.iowa.gov](mailto:diane.brockshus@dnr.iowa.gov) or by phone at (515) 725-9514.

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<sup>1</sup> Submerged fill tubes installed after November 9, 2006, including retrofits, must extend to within 6 inches of the bottom of the storage tank, tank truck, or railcar.