

6C NESHAP Q&A for 2012 UST Certification Refresher Training

- 1) If a GDF goes over 100,000 gallons a month, do they need to install VRS immediately?
 - If they first went over 100,000 gallons /month after January 10, 2011, they have three years to comply.
- 2) 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.
- 3) 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 rule and other EPA air quality regulations. Therefore, these blends must be included in the monthly throughput calculations.
- 4) Is diesel kerosene, avgas (aviation fuel?), jet fuel, new oil, or waste oil included in the monthly throughput calculations?
 - No.
- 5) 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.
- 6) 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.
- 7) What should a GDF do if they don’t have poppet valves installed?
 - The required poppet valve for co-axial VRS should be installed as expeditiously as possible, and no later than 60 days after discovery. This includes conducting the necessary leak and pressure tests after the poppet valve is installed to demonstrate compliance.
- 8) What if there is a problem with VRS equipment failure, such 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 as expeditiously as possible, and no later than 60 days after discovery. This includes replacing equipment or components, as necessary, and conducting the leak and pressure tests to demonstrate compliance.

- 9) What will happen if the failing equipment is not repaired or replaced and re-tested within 60 days?
- The DNR will send 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.
- 10) What if a GDF fails a VRS test required under the rule? If a repair is made immediately and a follow-up re-test shows compliance, do I need to report the failed test(s)?
- All failed tests must be reported to the DNR, even if a follow-up test shows compliance. Any failed test is considered a violation and must be corrected as soon as possible and no later than 60 days after the failed test.
- 11) Does a VRS test demonstrating compliance (passing) for the rule 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.