

**RULE 1178. FURTHER REDUCTIONS OF VOC EMISSIONS FROM STORAGE TANKS AT PETROLEUM FACILITIES**

(a) Purpose

The purpose of this rule is to further reduce emissions of volatile organic compounds (VOC) from storage tanks located at petroleum facilities.

(b) Applicability

The rule applies to all aboveground storage tanks that have capacity equal to or greater than 75,000 liters (19,815 gallons), are used to store organic liquids with a true vapor pressure greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions, and are located at any petroleum facility that emits more than 40,000 pounds (20 tons) per year of VOC in any emission inventory year starting with the emission inventory year 2000.

(c) Definitions

For the purpose of this rule the following definitions shall apply:

- (1) ACCESS HATCH is an opening in the roof with a vertical well and a cover attached to it. Access hatch provides passage for workers and materials through the roof for construction or maintenance.
- (2) AMBIENT TEMPERATURE is the temperature of an organic liquid within a storage tank that has been influenced by atmospheric conditions only and is not elevated by a non-atmospheric means of heating at the tank which includes but is not limited to steam, hot water, heaters, heat exchangers, tank insulation, or tank jacketing.
- (3) CERTIFIED PERSON is a person who has successfully completed the District tank self-inspection program and a District approved fugitive emissions compliance inspection program, and who holds a certificate issued by the Executive Officer evidencing that such person is in good standing in this program.
- (4) CONTINUOUS SEAL is a seal that forms a continuous closure that completely covers the annular space between the wall of the storage vessel and the edge of the floating roof. A continuous seal may be a vapor-mounted, liquid-mounted, or metallic shoe seal. A continuous seal may be constructed of fastened segments so as to form a continuous seal.

- (5) DOMED ROOF is a self-supporting fixed roof attached to the top of an external floating roof tank to reduce evaporative losses.
- (6) EMISSION CONTROL SYSTEM is a combination of capture system(s) and control equipment used to recover, reduce, remove or control the release of VOC to the atmosphere. Such equipment includes, but is not limited to, absorbers, adsorbers, compressors, condensers, incinerators, flares, boilers, and process heaters.
- (7) EMISSION INVENTORY YEAR is the annual emission-reporting period beginning from July 1 of the previous year through June 30 of a given year. For example, emission inventory year 2000 covers the period from July 1, 1999 through June 30, 2000.
- (8) EXTERNAL FLOATING ROOF TANK is a storage tank with a roof consisting of a double deck or pontoon single deck which rests or floats on the liquid being contained.
- (9) EXEMPT COMPOUNDS are as defined in Rule 102.
- (10) FACILITY is any equipment or group of equipment or other VOC-emitting activities, which are located on one or more contiguous properties within the District, in actual physical contact or separated solely by a public roadway or other public right-of-way, and are owned or operated by the same person (or by persons under common control), or an outer continental shelf (OCS) source as determined in 40 CFR Section 55.2. Such above-described groups, if noncontiguous, but connected only by land carrying a pipeline, shall not be considered one facility.
- (11) FIXED ROOF SUPPORT COLUMN AND WELL is a column made of round pipe or of structural shape with an irregular cross section that passes through the floating roof via a peripheral vertical well and is used to support the roof of an internal floating roof tank.
- (12) FIXED ROOF TANK is a storage tank with a permanently affixed roof.
- (13) FUEL GAS SYSTEM is the piping and control system that gathers gaseous stream(s) generated by onsite operations and transports the gaseous stream for sale or for use as fuel gas in combustion devices, or in-process combustion equipment such as furnaces and gas turbines, either singly or in combination.
- (14) GAUGE FLOAT is a device that is used to indicate the level of liquid within the tank. The float rests on the liquid surface and is housed inside a well that is closed by a removable cover.

- (15) GAUGE HATCH/SAMPLE PORT is an opening in the roof that provides access for gauging or sampling. A gauge hatch/sample port is usually equipped with a closing cover or a funnel and slit-fabric seal to cover the opening.
- (16) GUIDEPOLE is an anti-rotation device that is fixed to the top and bottom of the tank, passing through a well that is equipped with a sliding cover. The guidepole is used to prevent adverse movement of the roof and subsequent damage to the roof fittings and rim seals, or as access for level gauging or sampling of the liquid stock. The guidepole can be solid or equipped with slots or holes for gauging purpose.
- (17) INTERNAL FLOATING ROOF TANK is a storage tank equipped with a fixed roof and a floating roof which rests on the liquid being contained.
- (18) LADDER AND WELL is a ladder that passes through a well, and is used to access the tank bottom of an internal floating roof tank.
- (19) LIQUID MOUNTED PRIMARY SEAL is a primary seal that is mounted in full contact with the liquid in the annular space between the tank shell and the floating roof.
- (20) MECHANICAL SHOE PRIMARY SEAL is a metallic band attached to the floating roof sliding in contact with the tank shell. The shoes are supported and held against the tank shell by a mechanical device, and are joined together to form a ring. The vapor space between the shoe and the roof is sealed from the atmosphere by a primary seal of coated or VOC impervious fabric.
- (21) ORGANIC LIQUID is any liquid containing VOC.
- (22) PETROLEUM FACILITY is any facility primarily engaged in the production, refining, storage, transfer or distribution of crude petroleum or petroleum products as defined in the Standard Industrial Classification for crude petroleum and natural gas (SIC code 1311), petroleum refining (SIC code 2911), petroleum bulk stations and terminals (SIC code 5171), or other related industries (e.g., SIC codes 4226, 4612, 4613, 4923 and 5541).
- (23) POLE FLOAT is a device located inside a guidepole that floats on the surface of the stored liquid, and is used to indicate the liquid level inside the tank.

- (24) POLE SLEEVE is a device that extends from either the cover or the rim of an opening in a floating roof deck to the outer surface of a pole that passes through the opening.
- (25) POLE WIPER is a seal that extends from either the cover or the rim of an opening in a floating roof deck to the outer surface of a pole that passes through the opening.
- (26) PRESSURE-VACUUM VENT is a vent that is used to minimize tank emissions due to breathing effects.
- (27) PRIMARY SEAL is a seal mounted below a secondary seal of a rim seal system that consists of two seals. A primary seal, which is in contact with the floating roof tank shell, can be either mechanical shoe, resilient filled, or wiper type.
- (28) RESILIENT FILLED PRIMARY SEAL is an envelope filled with resilient foam (non-metallic polyurethane) mounted at the rim of the floating roof that makes contact with the shell. A resilient filled nonmetallic primary seal can be liquid-mounted or vapor-mounted.
- (29) RIM MOUNTED SECONDARY SEAL is a secondary seal mounted on the rim of the floating roof of a storage tank. Rim mounted secondary seals are effective at reducing losses from the primary seal fabric.
- (30) RIM SEAL SYSTEM is a closure device between the shell of the storage tank and the floating roof edge. A rim seal system may consist of two seals, one above the other. The lower seal is referred to as the primary seal and the upper seal is referred to as the secondary seal.
- (31) RIM VENT is a device consisting of a weighted pallet that rests on a valve seat. Rim vents are used to release any excess pressure or vacuum present in the vapor pocket between the seal and the rim area of a floating roof tank.
- (32) ROOF DRAIN is a drain on the roof of a floating roof tank that is used to remove rainwater from the floating roof. There are two types of roof drains. A closed roof drain removes the rainwater from the surface of the roof through a flexible hose through the stored liquid prior to exiting the tank. With a closed roof drain, the rainwater does not come in contact with the liquid stored in the tank. An open roof drain is any drain other than the closed roof drain. An open roof drain is typically used only during an emergency.

- (33) ROOF LEG is a device that holds the floating roof at a predetermined distance from the tank bottom to allow for tank cleaning or repair. There are two types of roof legs, adjustable or fixed. Fixed legs are attached to the floating roof or hangers suspended from the roof, whereas adjustable legs pass through a well or sleeve, and penetrate the roof.
- (34) ROOF OPENING is any opening through a floating roof of a storage tank for any roof fitting including but not limited to access hatch, fixed roof support column and well, gauge float, gauge hatch, sample port, guidepole, ladder and well, rim vent, roof drain, roof leg, and vacuum breaker, and excluding rim seal system.
- (35) SECONDARY SEAL is a seal mounted above the primary seal of a rim seal system that consists of two seals. Secondary seals can be shoe mounted or rim-mounted.
- (36) SHOE MOUNTED SECONDARY SEAL is a secondary seal mounted on the primary mechanical shoe. Shoe mounted secondary seals are effective at reducing vapor losses from the gaps between the shoe and the tank shell.
- (37) SLOTTED GUIDEPOLE is a guidepole that has slots or holes through the wall of the guidepole. The slots or holes allow the stored liquid to flow into the pole at liquid levels above the lowest operating level.
- (38) STORAGE TANK is a stationary aboveground container that has capacity equal to or greater than 75,000 liters (19,815 gallons) and is used to store organic liquids with a true vapor pressure greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions.
- (39) TRUE VAPOR PRESSURE is the vapor pressure of a liquid at actual storage conditions.
- (40) VACUUM BREAKER is a device used to equalize the pressure of the vapor space across the deck as the floating roof is either being landed on or floated off its legs. A vacuum breaker consists of a well with a cover. Attached to the underside of the cover is a guided leg long enough to contact the tank bottom as the floating roof is being landed. When in contact with the tank bottom, the guided leg mechanically lifts the cover off the well.
- (41) VAPOR MOUNTED PRIMARY SEAL is a primary seal that does not come in contact with the liquid in the annular space between the tank shell and the floating roof.

- (42) VAPOR TIGHT CONDITION is a condition that exists when the reading on a portable hydrocarbon analyzer is less than 500 parts per million (ppm), expressed as methane, above background, measured using EPA Reference Method 21.
  - (43) VISIBLE GAP is a gap of more than 1/8 inch between any gasket or seal and the opening that it is intended to seal. Visible gap for primary and secondary seals is a gap that does not meet the requirements specified in subdivision (d).
  - (44) VOLATILE ORGANIC COMPOUNDS (VOC) as defined in Rule 102.
  - (45) WASTE STREAM TANK is a storage tank containing at least 75% water by volume, and some liquid waste stream generated in a manner which contains petroleum liquid, emulsified oil, VOC or other hydrocarbons. For the purpose of this rule, waste stream tanks include waste water tanks and recovered oil (or slop oil) tanks.
  - (46) WIPER PRIMARY SEAL is a continuous annular blade of flexible material (e.g. rubber, urethane, or foam filled) fastened to a mounting bracket on the deck perimeter that spans the annular rim space and contacts the tank shell. A wiper seal system may consist of a single primary seal, or dual (multiple) seals where one seal is mounted above the other.
- (d) Requirements
- (1) External Floating Roof Tanks
    - (A) No later than July 1, 2003, the operator of an external floating roof tank containing organic liquids having true vapor pressure of less than 3 psia at any petroleum facility with annual VOC emissions exceeding 40,000 lbs (20 tons) for emission inventory year 2000 shall:
      - (i) Equip each access hatch and gauge float well with a cover that is gasketed and bolted. The cover shall be closed at all times, with no visible gaps, except when the hatch or well must be opened for access.
      - (ii) Equip each gauge hatch/sample well with a cover that is gasketed. The cover shall be closed at all times, with no visible gaps, except when the hatch or well must be opened for access.

- (iii) Gasket or cover each adjustable roof leg with a VOC impervious sock at all times when the roof is floating.
- (iv) Gasket each rim vent. Rim vents shall be closed at all times, with no visible gaps, when the roof is floating; and shall be set to open only when the roof is being floated off the roof leg supports or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting.
- (v) Gasket each vacuum breaker. Vacuum breakers shall be closed at all times, with no visible gaps, when the roof is floating; and shall be set to open only when the roof is being floated off or is being landed on the roof leg supports.
- (vi) Equip each open floating roof drain with a slotted membrane fabric cover or other device with an equivalent control efficiency that covers at least 90 percent of the area of the opening.
- (vii) Equip each unslotted guidepole well with a gasketed sliding cover and a flexible fabric sleeve or wiper.
- (viii) Equip each unslotted guidepole with a gasketed cover at the end of the pole. The cover shall be closed at all times, with no visible gaps, except when gauging or sampling.
- (ix) Equip each slotted guidepole with a gasketed cover, a pole wiper and a pole sleeve. The pole sleeve shall be extended into the stored liquid.
- (x) Equip each slotted guidepole having a pole float with a gasketed cover, a pole wiper, and a pole float wiper. The wiper or seal of the pole float shall be at or above the height of the pole wiper.
- (xi) Cover each slotted guidepole opening with a gasketed cover at all times, with no visible gaps, except when the cover must be opened for access.
- (xii) Maintain the pole float in a condition such that it floats within the guidepole at all times except when it must be removed for sampling or when the tank is empty.

- (xiii) Except for vacuum breakers and rim vents, ensure that each opening in the external floating roof shall provide a projection below the liquid surface.
  - (xiv) Except for vacuum breakers, rim vents, roof drains, and leg sleeves, equip all other openings in the roof with a gasketed cover or seal which is closed at all times, with no visible gaps, except when the cover or seal must be opened for access.
- (B) No later than July 1, 2003, the operator of an external floating roof tank containing organic liquids having true vapor pressure of less than 3 psia at any petroleum facility with annual VOC emissions exceeding 40,000 lbs (20 tons) for emission inventory year 2000 shall equip the tank with a rim seal system meeting the following requirements:
- (i) The primary seal shall be a mechanical shoe or liquid mounted.
  - (ii) The secondary seal shall be rim mounted and shall not be attached to the primary seal.
  - (iii) Gaps between the tank shell and the primary seal shall not exceed 1.3 centimeters (1/2 inch) for a cumulative length of 30 percent of the circumference of the tank, and 0.32 centimeter (1/8 inch) for 60 percent of the circumference of the tank. No gap between the tank shell and the primary seal shall exceed 3.8 centimeters (1-1/2 inches). No continuous gap between the tank shell and the primary seal greater than 0.32 centimeter (1/8 inch) shall exceed 10 percent of the circumference of the tank.
  - (iv) Gaps between the tank shell and the secondary seal shall not exceed 0.32 centimeter (1/8 inch) for a cumulative length of 95 percent of the circumference of the tank. No gap between the tank shell and the secondary seal shall exceed 1.3 centimeters (1/2 inch).
  - (v) Mechanical shoe primary seals shall be installed so that one end of the shoe extends into the stored organic liquid and the other end extends a minimum vertical distance of 61



- centimeters (24 inches) above the stored organic liquid surface.
- (vi) The geometry of the shoe shall be such that the maximum gap between the shoe and the tank shell is no greater than double the gap allowed by the seal gap criteria specified in clause (d)(1)(B)(iii) for a length of at least 46 centimeters (18 inches) in the vertical plane above the liquid surface.
  - (vii) The primary seal envelope shall be made available for unobstructed inspection by the Executive Officer along its circumference. In the case of riveted tanks with resilient filled primary seals, at least eight such locations shall be made available; for all other types of seals, at least four such locations shall be made available. If the Executive Officer deems it necessary, further unobstructed inspection of the primary seal may be required to determine the seal's condition along its entire circumference.
  - (viii) The secondary seal shall be installed in a way that permits the Executive Officer to insert probes up to 3.8 centimeters (1-1/2 inches) in width to measure gaps in the primary seal.
  - (ix) There shall be no holes, tears or openings in the secondary seal or in the primary seal envelope surrounding the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal.
  - (x) Except during the preventive maintenance, repair, or inspection periods specified in subdivision (f) and (g) of this rule that do not exceed 72 hours with prior notification to the Executive Officer, both the primary seal and the secondary seal shall cover the annular space between the external floating roof and the wall of the storage tank in a continuous fashion, with no visible gaps.
  - (xi) The operator shall use a rim seal system that is identified on the current list of seals approved by the Executive Officer. The operator requesting the use of an alternative rim seal system shall submit a written application including emission test results and analysis demonstrating that the alternative rim seal system is better in performance and has

a rim seal loss emission factor that is less than or equal to the current design.

- (C) No later than July 1, 2003, in lieu of complying with the requirement of no visible gap in subparagraph (d)(1)(A), the operator of an external floating roof tank shall maintain all roof openings in a vapor tight condition at all times except during preventive maintenance, repair, or inspection periods specified in subdivision (f) and (g) of this rule.
- (2) **Domed External Floating Roof Tanks**
  - (A) **Phase I:** The operator at any petroleum facility with annual VOC emissions exceeding 40,000 lbs (20 tons) for emission inventory year 2000 shall install domed roofs on all external floating roof tanks that contain organic liquids having true vapor pressure greater than or equal to 3 psia as reported in the Annual Emissions Report pursuant to Rule 301 - Permit Fees for the emission inventory year 2000 according to the following schedule:
    - (i) At least 1/3 of the tanks subject to this provision by January 1, 2004;
    - (ii) At least 2/3 of the tanks subject to this provision by January 1, 2006;
    - (iii) All tanks subject to this provision by January 1, 2008.
    - (iv) As an alternative to clauses (i) through (iii) above, an operator may submit a compliance plan demonstrating that 75% of the tanks subject to this provision have domes installed by December 31, 2006, and 100% of such tanks shall have domes installed by December 31, 2008. The Executive Officer shall approve any plan which convincingly demonstrates compliance and may impose conditions of approval necessary to assure compliance. The operator shall comply with all provisions and conditions of an approved plan.
  - (B) **Phase II:** For additional external floating roof tanks that are not identified under Phase I but contain organic liquids having true vapor pressure greater than or equal to 3 psia as reported in the Annual Emissions Report pursuant to Rule 301 - Permit Fees for any emission inventory year after 2000, the operator who is subject

to Phase I shall comply with the requirements specified in subparagraph (d)(2)(A) no later than two years after becoming subject to the rule. In those cases where the two-year period falls within Phase I, the operator shall complete the installation of the domes on all Phase II tanks by no later than January 1, 2010, or December 31, 2010 if choosing to comply with the alternative in clause (d)(2)(A)(iv). The applicability and compliance verification of waste stream tanks and recovered oil tanks shall be based on a monthly average true vapor pressure greater than or equal to 3 psia. The monthly average true vapor pressure of waste stream shall be determined based on at least one representative sample or multiple samples collected from the top surface layer that is no deeper than 6 inches at a frequency committed to in writing by the affected facility no later than January 1, 2003. The facility shall monitor and keep records of sampling results and monthly average true vapor pressures on site and make them available to the Executive Officer upon request.

- (C) In lieu of complying with the requirements in subparagraph (d)(2)(B), the operator who is subject to Phase I shall accept permit conditions to limit the true vapor pressure of the organic liquids stored in the tanks to lower than 3 psia by the end of Phase I.
- (D) The operator of a domed external floating roof tank shall equip and maintain all roof openings in accordance with the specifications listed in subparagraph (d)(1)(A) by the applicable compliance date in subparagraph (d)(2)(A) and (d)(2)(B).
- (E) The operator of a domed external floating roof tank shall equip the tank with a rim seal system consisting of a primary and a secondary seal meeting the specifications listed in subparagraph (d)(1)(B) by the applicable compliance date in subparagraphs (d)(2)(A) and (d)(2)(B).
- (F) The operator shall ensure that the concentration of organic vapor in the vapor space above a domed external floating roof shall not exceed 30 percent of its lower explosive limit (LEL) by the applicable compliance date in subparagraph (d)(2)(A) and (d)(2)(B).

- (G) The operator shall submit to the Executive Officer an annual status report including at a minimum all of the following:
- (i) A list of all external floating roof tanks subject to the requirement in subparagraphs (d)(2)(A) and (d)(2)(B);
  - (ii) A general description of each tank including information such as tank identification, District permit number or District device identification, tank type, tank capacity, type of liquid stored, and if applicable, number of representative samples, frequency of sampling, averaging method used to determine the monthly average true vapor pressure of waste stream or recovered oil tanks, and the results.
  - (iii) A compliance status for each tank; and
  - (iv) An estimated compliance date for each external floating roof tank that is not yet in compliance with the requirement in subparagraph (d)(2)(A) and (d)(2)(B).
- (3) Internal Floating Roof Tanks
- When an internal floating roof tank is scheduled for emptying and degassing, but no later than January 1, 2007, the operator of an internal floating roof tank at any petroleum facility with annual VOC emissions exceeding 40,000 lbs (20 tons) for emission inventory year 2000 shall:
- (A) Equip each fixed roof support column and well with a sliding cover that is gasketed or with flexible fabric sleeves;
  - (B) Equip each ladder well with a gasketed cover. The cover shall be closed at all times, with no visible gaps, except when the well must be opened for access;
  - (C) Equip and maintain other roof openings according to the specifications listed in subparagraph (d)(1)(A) or (d)(1)(C);
  - (D) Equip the tank with a rim seal system consisting of either a primary seal, or a primary and a secondary seal meeting the specifications listed in subparagraph (d)(1)(B), with the exception of a mechanical shoe primary seal which shall have one end extend a minimum vertical distance of 15 centimeters (6 inches) above the liquid surface and the other end extend into the liquid a minimum of 10 centimeters (4 inches); and
  - (E) Ensure that the concentration of organic vapor in the vapor space above the internal floating roof shall not exceed 50 percent of its

lower explosive limit (LEL) for those installed prior to June 1, 1984 and 30 percent of its LEL for those installed after June 1, 1984.

(4) Fixed Roof Tanks

(A) No later than January 1, 2007, the operator of a fixed roof tank at any petroleum facility with annual VOC emissions exceeding 40,000 lbs (20 tons) for emission inventory year 2000 shall equip each fixed roof tank containing organic liquids with true vapor pressure greater than 0.1 psia with an emission control system meeting the following requirements:

- (i) The tank emissions are vented to an emission control system with an overall control efficiency of at least 95% by weight or the tank emissions are vented to a fuel gas system.
- (ii) Any tank gauging or sampling device on a tank shall be equipped with a vapor tight cover which shall be closed at all times, with no visible gaps, except during gauging or sampling. The roof of such tank shall be properly maintained in a vapor tight condition with no holes, tears or uncovered opening.
- (iii) All openings on the roof shall be properly installed and maintained in a vapor tight condition at all times.
- (iv) The operator shall equip each fixed roof tank with pressure-vacuum vents that shall be set to the lesser of 10% below the maximum allowable working pressure of the roof or 0.5 psig.
- (v) The operator shall maintain pressure-vacuum vents in a vapor tight condition at all times except when the operating pressure of the fixed roof tank exceeds the manufacturer's recommended setting.

(B) In lieu of complying with the requirement in subparagraph (d)(4)(A), the operator may choose to convert the fixed roof tank to an external floating roof tank or an internal floating roof tank meeting the requirements specified in paragraph (d)(1) or (d)(3).

- (5) The operator of any petroleum facility with annual VOC emissions exceeding 40,000 lbs (20 tons) for any emission inventory year subsequent to 2000 reporting pursuant to Rule 301 – Permit Fees shall:
    - (A) Comply with the requirements for external floating roof tanks specified in paragraph (d)(1) no later than one year after becoming subject to this rule.
    - (B) Comply with the requirements for domed external floating roof tanks specified in paragraph (d)(2) no later than six years after becoming subject to this rule. Any external floating roof tank that later becomes subject to this requirement based on any subsequent emission inventory year, shall comply with the requirements in paragraph (d)(2) no later than two years after becoming subject to this rule.
    - (C) Comply with the requirements for internal floating roof tanks specified in paragraph (d)(3) when the tanks are scheduled for emptying and degassing, but no later than five years after becoming subject to this rule.
    - (D) Comply with the requirements for fixed roof tanks specified in paragraph (d)(4) no later than five years after becoming subject to this rule.
  - (6) The operator of all tanks for which a permit to construct and operate has been issued by the Executive Officer on and after January 1, 2002 for new construction shall comply with the requirements of subdivision (d).
- (e) Identification Requirements
- (1) The operator shall permanently identify all tanks subject to the requirements of this rule by a visible sign that includes the tank number, on the outside wall of the tank for inventory, inspection and record keeping purposes.
  - (2) The operator shall notify the Executive Officer of any change(s) in tank identification.
- (f) Monitoring Requirements
- (1) External Floating Roof Tanks

To demonstrate compliance with paragraph (d)(1), the operator shall have a certified person conduct the following in accordance with the procedures and guidelines specified in Attachment A:

- (A) Conduct an EPA Method 21 inspection or measure gaps of all roof openings on a semiannual basis and each time the tank is emptied and degassed.
- (B) Perform complete gap measurements of the rim seal system on a semiannual basis and each time the tank is emptied and degassed.

(2) Domed External Floating Roof Tanks and Internal Floating Roof Tanks

To demonstrate compliance with paragraph (d)(2) and (d)(3), the operator shall have a certified person conduct the following in accordance with the procedures and guidelines specified in Attachment A:

- (A) Visually inspect the rim seal system and roof openings and use an explosimeter to measure the lower explosive limit (LEL) on a semiannual basis.
- (B) Perform complete gap measurements of the rim seal system each time the tank is emptied and degassed but no less than once every ten years.
- (C) Perform complete gap measurements of all roof openings each time the tank is emptied and degassed but no less than once every ten years.

(3) Fixed Roof Tanks

- (A) No later than 180 days after the effective date of the requirements, the operator of a facility who elects to install an emission control system to comply with the requirements in clause (d)(4)(A)(i) shall conduct an initial performance testing to determine the overall efficiency of the emission control system and submit a complete test report to the Executive Officer. The performance testing of the emission control system shall be repeated when the system is modified or an operating parameter is changed in a manner that affects the capture or control efficiency. In such case, the performance test shall be conducted and the test report submitted to the Executive Officer within 180 days after the modification. Subsequent to the initial performance test, the operator shall conduct annual performance tests, and shall monitor and record applicable operating parameters on a weekly basis to ensure that

the emission control system is achieving 95% overall control efficiency.

- (B) To demonstrate compliance with clause (d)(4)(A)(ii), (d)(4)(A)(iii) and (d)(4)(A)(v), the operator shall have a certified person conduct EPA Method 21 measurements on a quarterly basis.
- (C) To demonstrate compliance with clause (d)(4)(A)(iv), the operator shall keep engineering data sheet for pressure-vacuum vents installed after January 1, 2002.

(g) **Maintenance Requirements**

The operator shall repair, or replace any piping, valves, vents, seals, gaskets, or covers of roof openings that are found to have defects or visible gaps, or are not vapor tight, and do not meet all the requirements of this rule before filling or refilling an emptied and degassed storage tank, or within 72 hours after any operator inspection specified in subdivision (f).

(h) **Record Keeping and Reporting Requirements**

- (1) During the inspections specified subdivision (f), the operator shall keep records of all findings, including but not limited to the readings measured according to EPA Reference Test Method 21.
- (2) The operator shall record all inspections of primary, secondary seals, and roof openings on compliance inspection report forms approved by the Executive Officer as described in Attachment A.
- (3) The operator shall submit all inspection reports and documents to the Executive Officer semiannually within five working days of completion of the inspections specified in paragraph (f)(1) and (f)(2); and within thirty working days of completion of two consecutive quarterly inspections specified in paragraph (f)(3).
- (4) If the operator determines that a tank is in violation of the requirements of this rule during the inspections specified subdivision (f), the operator shall submit a written report to the Executive Officer within 120 hours of the determination of non-compliance, indicating corrective actions taken to achieve compliance.
- (5) The operator who elects to install or modify an emission control system to comply with the requirement in clause (d)(4)(A)(i) shall conduct an initial performance test as described in clause (f)(3)(A) and submit a complete



test report to the Executive Officer no later than 180 days after the effective date of the requirement for new installation; or 180 days after the modification. Subsequent annual performance test and test report shall be submitted annually within 60 days after the end of each emission inventory year.

- (6) The operator shall keep all monitoring, inspection, maintenance, and repair records at the facility for a period of five years and shall make the records available to the Executive Officer upon request.

(i) Test Methods and Procedures

The following test methods and procedures shall be used to determine compliance with this rule. Alternative test methods may be used if they are determined to be equivalent and approved in writing by the Executive Officer, the California Air Resources Board, and the U.S. Environmental Protection Agency.

- (1) Measurements of gaseous volatile organic compound leaks shall be conducted according to EPA Reference Method 21 using an appropriate analyzer calibrated with methane.
- (2) Organic liquids that are stored at ambient temperatures with a true vapor pressure of greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions shall be determined as those with a flash point of less than 100 °F as determined by ASTM Method D-93.
- (3) Organic liquids that are stored at above ambient temperatures with a true vapor pressure greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions shall be determined as those whose volume percent evaporated is greater than ten percent at an adjusted temperature  $T_{Adj}$  as determined by ASTM Method D-86 of:

$$T_{Adj} = 300 \text{ }^{\circ}\text{F} + T_1 - T_a$$

Where:

$T_1$  = Liquid Storage Temperature (°F)

$T_a$  = Ambient Temperature (°F) = 70 °F

- (4) Organic liquids with a true vapor pressure of greater than or equal to 3 psia shall be determined by ASTM Method D-323 for Reid vapor pressure and converted to true vapor pressure using applicable nomographs in EPA AP-42 or District and EPA approved nomographs. The actual storage

temperature used for determining true vapor pressure shall be 70 degrees Fahrenheit for organic liquids that are stored at ambient temperatures, and actual storage temperature for organic liquids that are stored at above ambient temperatures.

- (5) Control efficiency of an emission control system, on a mass emissions basis, and the VOC concentrations in the exhaust gases shall be determined by U.S. EPA Test Methods 25, 25A; District Method 25.1 - Determination of Total Gaseous Non-Methane Organic Emissions as Carbon; or District Method 25.3 – Determination of Low Concentration Non-Methane Non-Ethane Organic Compound Emissions from Clean Fueled Combustion Sources, as applicable.
- (6) When more than one test method or set of test methods are specified for any testing, the application of these methods to a specific set of test conditions is subject to approval by the Executive Officer. In addition, a violation of any requirement of this rule established by any one of the specified test methods or set of test methods shall constitute a violation of the rule.
- (7) The sampling, analysis, and reporting shall be conducted by a laboratory that has been approved under the District Laboratory Approval Program (LAP) for the cited District reference test methods, where LAP approval is available. For District reference test methods for which no LAP program is available, the LAP approval requirement shall become effective one year after the date that the LAP program becomes available for that District reference test method.
- (8) Tests to determine emission factors for an alternative control device for rim seal or deck opening shall accurately simulate conditions under which the device will operate, such as wind, temperature, and barometric pressure. Test methods that can be used to perform the testing required in this paragraph include, but are not limited to, the following methods, which shall be performed by a laboratory certified by American Petroleum Institute (API):
  - (A) API Manual of Petroleum Measurement Standards, Chapter 19, Section 3, Part A, Wind Tunnel Test Method for the Measurement of Deck-Fitting Loss Factors for External Floating-Roof Tanks;

- (B) API Manual of Petroleum Measurement Standards, Chapter 19, Section 3, Part B, Air Concentration Test Method for the Measurement of Rim Seal Loss Factors for Floating-Roof Tanks.
  - (C) API Manual of Petroleum Measurement Standards, Chapter 19, Section 3, Part E; Weight Loss Test Method for the Measurement of Deck-Fitting Loss Factors for Internal Floating-Roof Tanks.
- (j) Exemptions
- (1) The provisions of this rule shall not apply to pressurized storage tanks designed to operate in excess of 15 pounds per square inch gauge (psig) without any emissions to the atmosphere except under emergency conditions.
  - (2) Domed external floating roof tanks installed prior to January 1, 2002 shall be exempt from the requirements of subparagraph (d)(2)(D) and (d)(2)(E) for secondary seals.
  - (3) Any facility with a facility emission cap equal to or less than 40,000 pounds (20 tons) per year of VOC shall be exempt from the requirements of this rule.
  - (4) Portable Baker tanks containing organic liquids having true vapor pressures from 0.1 psia to 0.5 psia equipped with carbon canisters to reduce the emissions from the storage tanks to less than 500 ppm outlet concentration shall be exempt from the performance testing requirements specified in clause (d)(4)(A)(i) and subparagraph (f)(3)(A) provided that the operator conducts EPA Reference Method 21 measurement weekly to ensure that the system achieves the emission standard of 500 ppm.
  - (5) External floating roof tanks having permit conditions that limit the true vapor pressure of the organic liquids stored in the tanks to lower than 3 psia shall be exempt from the requirements of paragraph (d)(2).
  - (6) External floating roof tanks subject to clause (d)(1)(A)(i) shall be exempt from this requirement until the next time the tank is emptied and degassed, provided that the operator has demonstrated to the satisfaction of the Executive Officer that in order to properly bolt, the covers for access hatches and gauge float wells must be welded. The operator shall use equivalent means, such as clamping, to secure the covers during the interim period.

- (7) External floating roof tanks permitted to contain more than 97% by volume crude oil shall be exempt from the doming requirements of paragraph (d)(2)(A) and (d)(2)(B) but shall comply with other remaining applicable requirements of this rule.

## ATTACHMENT A

## INSPECTION PROCEDURES AND COMPLIANCE REPORT FORMS

Equipment Needed:

Organic Vapor Analyzer (OVA) calibrated with methane in accordance with EPA Test Method 21, explosimeter calibrated with methane (for internal floating roof tanks), liquid resistant measuring tape or device, tank probe (to measure gaps in tank seals - 1/8 inch, 1/2 inch, 1-1/2 inch), flashlight.

Inspection Procedures:

1. The findings of all tank self-inspections, whether completed or not, shall be recorded on the Rule 1178 Compliance Report forms prescribed by the Executive Officer and submitted to the District's Refinery Section in accordance with the rule's requirements. If an inspection is stopped before completion, indicate the reason for this action in the Comments section of the compliance report form.
2. During the compliance inspection, the person(s) conducting the inspection must have a copy of the Permit to Operate or Permit to Construct pertinent to the tank being inspected. Any discrepancies between the permit equipment description and the existing tank or the permit conditions and the actual operating conditions of the tank as verified during inspection must be recorded in the Comments section of the compliance report form.
3. Inspect the ground level periphery of each tank for possible leaks in the tank shell. Complete the tank information section (D) on the report.
4. For external floating roof tanks:
  - o From the platform, conduct an overall visual inspection of the roof and check for obvious permit or rule violations. Record the information as shown under section F of the compliance report form.
  - o During visual inspection of the roof, check for unsealed roof legs, open hatches, open emergency roof drains or vacuum breakers and record the findings on the report accordingly. Indicate presence of any tears in the fabric of both seals.
  - o Conduct an inspection of the roof fittings for vapor tight condition and record any leaks above 500 ppm in the fugitive emissions tank report OR conduct an inspection of the roof fittings using the 1/8" probes.

- o Conduct an inspection of the entire secondary seal using the 1/8" and 1/2" probes. Record the gap data in section F(4) of the report.
  - o Conduct an inspection of the entire primary seal using the 1/8", 1/2", and 1-1/2" probes. Inspect the primary seal by holding back the secondary seal. Record the gap data in section F(5) of the report.
  - o Record all cumulative gaps between 1/8 inch and 1/2 inch; between 1/2 inch and 1-1/2 inch; and in excess of 1-1/2 inches, for both primary and secondary seals in section G of the report. Secondary seal gaps greater than 1/2 inch should be measured for length and width, and recorded in Comments under section (J) of the report.
5. For internal floating roof and domed tanks:
- o Using an explosimeter, measure the concentration of the vapor space above the internal floating roof in terms of lower explosive limit (LEL), and record the reading in section (E) of the report.
  - o Conduct a visual inspection of the roof openings and the secondary seal, if applicable, and record findings on the report .
  - o Conduct gap measurements of the rim seal system and roof openings each time the tank is emptied and degassed but no less than once every ten years.
6. For fixed roof tanks:
- o Conduct an inspection of the pressure relief valves, piping, valves and fittings located on the roof for vapor tight condition and record any readings in excess of 500 ppm in the fugitive emissions tank report.
7. Complete all necessary calculations and record all required data accordingly on the report.

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
RULE 1178 COMPLIANCE REPORT**

*\*\*PLEASE COMPLETE FORM LEGIBLY IN BLACK INK\*\**

Tank No. \_\_\_\_\_ SCAQMD Permit No. \_\_\_\_\_ Inspection Date \_\_\_\_\_ Time \_\_\_\_\_  
Is This a Follow-up Inspection? No  Yes  If yes, Date of Previous Inspection \_\_\_\_\_

**A. COMPANY INFORMATION:**

Company Name \_\_\_\_\_  
Location Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_  
Mailing Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_  
Contact Person \_\_\_\_\_ Title \_\_\_\_\_  
Phone \_\_\_\_\_

**B. INSPECTION CONDUCTED BY:**

Name \_\_\_\_\_ Title \_\_\_\_\_  
Company Name \_\_\_\_\_ Phone \_\_\_\_\_  
Mailing Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

**C. TANK INFORMATION:**

Capacity \_\_\_\_\_ (bbls) Installation Date \_\_\_\_\_ Tank Diameter \_\_\_\_\_ (ft) Tank Height \_\_\_\_\_ (ft)  
Product Type \_\_\_\_\_ Product RVP \_\_\_\_\_  
Type of Tank: Riveted  Welded  Other  (describe) \_\_\_\_\_  
Color of Shell \_\_\_\_\_ Color of Roof \_\_\_\_\_  
Roof Type: Pontoon  Double Deck  Other(describe) \_\_\_\_\_  
External floating roof  Internal floating roof or domed tank

**D. GROUND LEVEL INSPECTION:**

- 1) Product Temperature \_\_\_\_\_ ° F      2) Product level \_\_\_\_\_ (ft)
- 3) List type and location of leaks found in tank shell.  
\_\_\_\_\_
- 4) List any discrepancies between the existing equipment and the equipment description on the Permit.  
\_\_\_\_\_
- 5) Is tank in compliance with Permit conditions? No  Yes  If no, explain \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**E. INTERNAL FLOATING ROOF OR DOMED TANK:**

- 1) Check vapor space between floating roof and fixed roof with explosimeter. \_\_\_\_\_ % LEL
- 2) Conduct visual inspection of roofs and secondary seals, if applicable.
- 3) Are all roof openings covered? No  Yes  If no, explain in Comments section (J) and proceed to part (H)(6).

**F. EXTERNAL FLOATING ROOF TANK (or DOMED TANK AND INTERNAL FLOATING ROOF TANK when needed)**

- 1) On the diagram (below) indicate the location of the ladder, roof drain(s), anti-rotation device(s), platform, gauge well, and vents or other appurtenances. *Note information in relation to North (to the top of the worksheet).*
- 2) Describe any uncovered openings found on the roof in the Comments section (J). (Refer to Rule 463(a)(1)(F)):
- 3) Identify any tears in the seal fabric. Describe and indicate on diagram (below):
- 4) Secondary Seal Inspection

- a) Type of Secondary Seal: \_\_\_\_\_
- b) Does 1/2" probe drop past seal? No  Yes  if yes, measure length(s) and show on diagram
- c) Does 1/8" probe drop past seal? No  Yes  if yes, measure length(s) and show on diagram.
- d) Record dimensions of gap for gaps > 1/8" \_\_\_\_\_ >1/2" \_\_\_\_\_

*NOTE: Record the actual width and cumulative length of gaps in feet and inches.  
(Do not include gaps > 1/2" in 1/8" measurements)*

5) Primary Seal Inspection

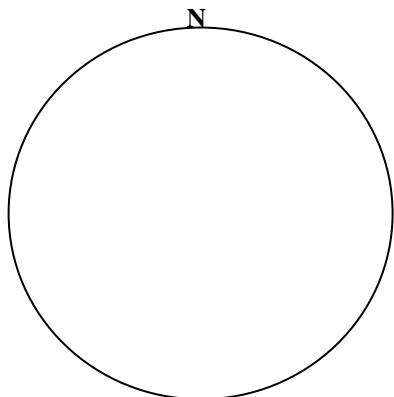
- a) Type of Primary Seal:  Shoe;  Tube;  Other \_\_\_\_\_
- b) (shoe seal) does 1-1/2" probe drop past seal? No  Yes ; if yes, measure length(s) and show on diagram.
- c) (shoe seal) does 1/2" probe drop past seal? No ; Yes ; if yes, measure length(s) and show on diagram.
- d) (tube seal) does 1/2" probe drop past seal? No  Yes  if yes, measure length(s) and show on diagram.
- e) (all seal types) does 1/8" probe drop past seal? No  Yes  if yes, measure (length(s) and show on diagram.
- f) Record dimensions of gaps for gaps >1/8" \_\_\_\_\_ > 1/2" \_\_\_\_\_

>1-1/2" \_\_\_\_\_ *NOTE: Record the actual width and cumulative length of gaps in feet and inches.  
(Do not include gaps > 1/2" in 1/8" measurements, or gaps > 1-1/2" in 1/2" measurements)*

6) Deck Fitting Inspection

- (circle one) does 1/8" probe drop past gasket seal or pass Method 21? No  Yes  if yes, identify

NOTE: Show defects using symbols. Show seal gaps and lengths.



- LEGEND:**
- Equipment:
- ⊥ Antirotational device
  - Gauge well
  - ⊥ Leg stand
  - ⊥ Roof drain
  - \* Emergency roof drain
  - ∞ Vacuum breaker
  - ▲ Vent
  - Platform & ladder
- Defects:
- ⊥ Leg top
  - ⊥ Leg pin
  - ⊥ Open hatch
  - ∖ Torn seal
  - |-P-| Primary seal gap
  - |-S-| Secondary seal gap



Tank No. \_\_\_\_\_ SCAQMD Permit No. \_\_\_\_\_

**IF INTERNAL FLOATING ROOF OR DOMED TANK, PROCEED TO PART H(6) WHEN APPROPRIATE:**

**G. CALCULATIONS - complete all applicable portions of the following:**

Record dimensions of indicated gaps [from F(4)(d), F(5)(b), and F(5)(f)]. Record in feet and inches.

- Gaps in primary seal between 1/8 and 1/2 inch: \_\_\_\_\_
- Gaps in primary seal between 1/2 and 1-1/2 inch: \_\_\_\_\_
- Gaps in primary seal greater than 1-1/2 inches: \_\_\_\_\_
- Gaps in secondary seal between 1/8 and 1/2 inch: \_\_\_\_\_
- Gaps in secondary seal greater than 1/2 inch: \_\_\_\_\_

Multiply diameter (ft) of tank to determine appropriate gap limits:

- 5% circumference = diameter X 0.157 = \_\_\_\_\_ 60% circ. = diam. X 1.88 = \_\_\_\_\_
- 10% circumference = diameter X 0.314 = \_\_\_\_\_ 90% circ. = diam. X 2.83 = \_\_\_\_\_
- 30% circumference = diameter X 0.942 = \_\_\_\_\_ 95% circ. = diam. X 2.98 = \_\_\_\_\_

**H. DETERMINE COMPLIANCE STATUS OF TANK:**

- 1) Were any openings found on the roof? No  Yes
- 2) Were any tears in the seals found? No  Yes
- 3) Is the product level lower than the level at which the roof would be floating? No  Yes
- 4) Secondary Seal:
  - Did 1/2" probe drop between shell and seal? No  Yes
  - Did cumulative 1/8" - 1/2" gap exceed 95% circumference length? No  Yes
- 5) Primary Seal
  - Shoe
    - Did 1-1/2" probe drop between shell and seal? No  Yes
    - Did cumulative 1/2" - 1-1/2" gap exceed 30% circumference length, and
      - Did cumulative 1/8 - 1/2" gap exceed 60% circumference length? No  Yes
      - Did any single continuous 1/8" - 1-1/2" gap exceed 10% circ. length? No  Yes
  - Tube
    - Did 1/2" probe drop between shell and seal? No  Yes
    - Did cumulative 1/8" - 1/2" gap exceed 95% circumference length? No  Yes
- 6) Internal floating roof (installed before 6/1/84) did LEL exceed 50% No  Yes 
  - (installed after 6/1/84) or domed tank did LEL exceed 30%? No  Yes
- 7) Does tank have permit conditions? No  Yes 
  - Does tank comply with these conditions? No  Yes

**I. IF INSPECTION WAS TERMINATED PRIOR TO COMPLETION FOR ANY REASON, PLEASE EXPLAIN:**

\_\_\_\_\_  
\_\_\_\_\_



