

Emission monitoring and NHV sampling for vapor combustion units.	The NESHAP standards contain a monitoring alternative to temperature, which requires the operator to show that the VCU meets an NHVdil “dilution parameter” as would be used for open flares. VCUs have comparable or superior performance to open flares, but, due to their design, the NHVdil monitoring parameter is not appropriate for VCUs. Also, to use this monitoring alternative, the facility must conduct 14 days of gas sampling to determine that the gasoline vapors contain sufficient Net Heating Value (NHV). This sampling exercise requires specialized equipment typically obtained via contractor services, so it is unclear that contractor availability permits hundreds or (as EPA estimates) thousands of VCUs from meeting these rule requirements. Our Petition provides EPA with emission testing information demonstrating that waste vapor dilution does not affect VCU performance.
Prior load information on gasoline cargo tanks.	The 2024 rule revisions now require gasoline loading facilities to base compliance on whether the prior load of each loaded cargo tank contained gasoline. We are deeply concerned because facility operators typically have no accurate means to determine prior tank contents in a third-party-operated vehicle – let alone to certify this information on a Title V compliance report. Maintaining a VCU temperature when not physically loading gasoline requires significant and costly amounts of supplemental fuel gas (see above).
Leak Detection and Repair (LDAR) contractor availability.	EPA estimates over 1,000 affected sources are subject to these NESHAP subparts.[5] The 2024 revisions will for the first time require these facilities to implement instrument-based LDAR programs by May 8, 2027. In the past, EPA has reserved instrument-based LDAR for large, centrally-located facilities such as petroleum refineries and chemical manufacturers. We are concerned that gasoline distribution facilities will face limits on LDAR contractor availability as the 2027 compliance date approaches.
OGI contractor availability.	EPA seems to be relying on OGI as the likely choice for monitoring pressure relief devices at loading racks.[6] While EPA represents that OGI is available, the reality is that EPA’s Appendix K for OGI leak detection requires significant amounts of training for OGI operators. OGI teams may not be available in sufficient number to meet industry demand, considering the number and remoteness of facilities.
LDAR at small remote facilities.	By requiring instrument monitoring at small bulk plants and pumping stations, EPA greatly increases the number of remotely located facilities that must complete initial LDAR compliance by 2027. The number and remoteness of these small facilities further limits contractor availability. Our rule comments and petitions also raised concerns about the cost-effectiveness of LDAR standards for these small facilities.