

VRU averaging period.	Some terminals reduce gasoline loading emissions using a vapor recovery unit (VRU), a system that collects gasoline vapors by adsorption or refrigeration and returns them to bulk storage. These units are typically equipped with continuous emission monitoring systems (CEMS) to determine emissions. The 2024 rule revisions reduce the averaging period of VRU emission standards from 6 to 3 hours. Facilities may be subject to an implicit requirement to replace equipment. We are concerned about equipment availability and the turnaround time to replace VRUs if needed.
Truck vapor tightness.	We are assessing the attainability of the 2027 rule's more stringent standards for vapor tightness of gasoline cargo compartments. We are concerned that in some locations, the third-party gasoline carriers may not be capable of meeting these more stringent requirements. They are subject to an even earlier compliance date of May 8, 2026.

[1] The date, May 8, 2027, appears in several compliance date paragraphs of Subpart R and Subpart BBBBBB, though the date May 10, 2027 appears in the Federal Register preamble as May 8 is a Saturday.

[2] *Petition for Reconsideration and Rulemaking, NESHAP for Gasoline Distribution Facilities and the Standards of Performance for Bulk Gasoline Terminals*, ILTA, EPA-HQ-OAR-2020-0371-0160. ("Petition") See also *ILTA Petition for reconsideration of LDAR modification - Subpart XXa*, ILTA, EPA-HQ-OAR-2020-0371-0161.

[3] EPA, *NESHAP and NSPS for Bulk Gasoline Terminals - Background Information for Final Amendments - Summary of Public Comments and Responses*, p. 24, EPA-HQ-OAR-2020-0371-0150. <https://downloads.regulations.gov/EPA-HQ-OAR-2020-0371-0150/content.pdf> ("Response to Comments.")

[4] Petition, Exhibit C.

[5] *Gasoline Distribution Equipment Leaks Control Options Workbook*, EPA-HQ-OAR-2020-0371-0010.

[6] "Generally, if the PRDs are elevated, OGI monitoring can be used without the need to use a lift to confirm that the PRD is correctly rescated. Therefore, we are finalizing the 5-day monitoring requirement as proposed." EPA, Response to Comments, p. 42.

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