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Attachment – Table of Availability Concern

Requirement	Availability Concern
Assist gas and temperature monitoring for vapor combustion units.	Many gasoline terminals rely on vapor combustion units (VCUs), a type of enclosed combustion system, to destroy gasoline vapors collected from cargo compartment loading racks. While the Subpart BBBBBB standard of 35 mg Total Organic Compounds (TOC) per liter of gasoline loaded (35 mg/L) is reasonable, the NESHAP applies the same stringent monitoring provisions as it uses for more stringent standards of 10 or 1 mg/L. These stringent monitoring standards require establishing a temperature during a period of high gasoline loading (§ 60.503a(c)(1)), then maintaining this high temperature even when loading other, less volatile fuels. (§ 60.502a(c)(1)(ii)) EPA acknowledges that a typical facility will need to use supplemental fuel gas to achieve high VCU temperatures set during § 60.503a(c) performance tests.[3] Supplemental fuel gas is not broadly available in remote locations where many gasoline distribution facilities are located. Supplemental fuel gas would typically consist of natural gas or LPG. LPG availability and pipeline right-of-way concerns can limit where supplemental gas can be used. Also, temperature monitoring is not suitable for some VCU designs. For those VCU designs, the rule currently provides no workable monitoring option. Our Petition provides EPA with emission testing information demonstrating that VCUs meet the rule's emission standards at temperatures near 400 °F. [4]