

NEW STATE AND FEDERAL AIR REGULATIONS FOR GASOLINE DISPENSING FACILITIES (GDFs)

(REFER TO CHAPTER 62-252, F.A.C. (STATE) and 40 CFR PART 63, SUBPART CCCCC (FEDERAL) FOR DETAILS)

MONTHLY THROUGHPUT RATE AND STATE/FEDERAL FACILITY CLASSIFICATION	OPERATIONAL REQUIREMENTS (S) – State (F) – Federal	FEDERAL (ONLY) NOTIFICATION REQUIREMENTS	FEDERAL (ONLY) TESTING REQUIREMENTS
<p>< 10,000 gallons</p> <ul style="list-style-type: none"> • Existing and New Federal (State rule not applicable) 	<ol style="list-style-type: none"> 1. Minimize gasoline spills. (F) 2. Clean up spills expeditiously. (F) 3. Cover gasoline containers and tank fill pipes with gasketed seal. (F) 4. Minimize gasoline sent to open collection systems. (F) 	<p>None, but you must keep, and make available upon request, records to document your throughput rates.</p>	<p>None</p>
<p>≥ 10,000 gallons</p> <ul style="list-style-type: none"> • Existing State • Existing Federal 	<ol style="list-style-type: none"> 1. If your GDF is currently required to use submerged fill and operate a vapor balance system, continue to comply with such requirements. (S) 2. If your GDF is not covered by 1. above, and you upgrade its storage tanks prior to 1-1-10, use submerged fill and operate a vapor balance system* upon resuming dispensing operations. (S) 3. If your GDF is not covered by 1. or 2. above, use submerged fill and operate a vapor balance system by 1-1-10. (S) 4. Comply with all requirements for GDFs < 10,000 gallons throughput. (F) 	<ol style="list-style-type: none"> 1. Submit Initial Notification by 5-9-08. 2. Submit Notification of Compliance Status by 1-10-11. <p>>>>No notifications are required if facility used submerged fill by 1-10-08 and is not subject to testing requirements.</p>	<p>If your gasoline throughput rate is equal to or greater than 100,000 gal./mo. and you have not operated a vapor balance system prior to 1-10-08 under state rules, you are required to demonstrate through testing that your vapor balance system complies with federal performance specifications. Test requirements are as follows:</p> <ol style="list-style-type: none"> 1. Conduct system testing using CARB test procedures TP-201.1E, Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves, and TP-201.3, Static Pressure Performance of Vapor Recovery Systems, or EPA-approved alternative test procedures.
<p>≥ 10,000 gallons</p> <ul style="list-style-type: none"> • Existing State • New Federal 	<ol style="list-style-type: none"> 1. If your GDF is currently required to use submerged fill and operate a vapor balance system, continue to comply with such requirements. (S) 2. If your GDF is not covered by 1. above, and its monthly throughput is equal to or greater than 100,000 gallons, use submerged fill and operate a vapor balance system* by the later of 1-10-08 or facility start-up date. (F) 3. If your GDF is not covered by 1. or 2. above, and you upgrade its storage tanks prior to 1-1-10, use submerged fill and operate a vapor balance system* upon resuming operations. (S) 4. If your GDF is not covered by 1., 2. or 3., above, use submerged fill by the later of 1-10-08 or facility start-up date (F), and operate a vapor balance system by 1-1-10. (S) 5. Comply with all requirements for GDFs < 10,000 gallons throughput. (F) 	<ol style="list-style-type: none"> 1. Submit Initial Notification by the later of 5-9-08 or facility start-up date. 2. Submit Notification of Compliance Status by the later of 1-10-08 or facility start-up date. 	<p>Test requirements are as follows:</p> <ol style="list-style-type: none"> 1. Conduct system testing using CARB test procedures TP-201.1E, Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves, and TP-201.3, Static Pressure Performance of Vapor Recovery Systems, or EPA-approved alternative test procedures.
<p>≥ 10,000 gallons</p> <ul style="list-style-type: none"> • New State • Existing Federal 	<ol style="list-style-type: none"> 1. Use submerged fill and operate a vapor balance system* by the later of 8-1-07 or facility start-up date. (S) 2. Comply with all requirements for GDFs < 10,000 gallons throughput. (F) 	<ol style="list-style-type: none"> 1. Submit Initial Notification by 5-9-08. 2. Submit Notification of Compliance Status by 1-10-11. <p>>>>No notifications are required if facility uses submerged fill by 1-10-08 and is not subject to testing requirements.</p>	<ol style="list-style-type: none"> 2. Conduct required tests within 180 days after beginning operation of the vapor balance system and every three years thereafter. 3. Keep, and make available for inspection, records of all tests performed within the previous 5 years.
<p>≥ 10,000 gallons</p> <ul style="list-style-type: none"> • New State • New Federal 	<ol style="list-style-type: none"> 1. Use submerged fill and operate a vapor balance system* by the later of 8-1-07 or facility start-up date. (S) 2. Comply with all requirements for GDFs < 10,000 gallons throughput. (F) 	<ol style="list-style-type: none"> 1. Submit Initial Notification by the later of 5-9-08 or facility start-up date. 2. Submit Notification of Compliance Status by the later of 1-10-08 or facility start-up date. 	<ol style="list-style-type: none"> 4. Give EPA 60 days prior notification of any testing to be performed.

* Note: If the monthly throughput of your GDF is equal to or greater than 100,000 gallons, and you are either a “New Federal” facility or an “Existing Federal” facility that is replacing its storage tanks, federal rules require that you employ a “dual-point” vapor balance system and not a “coaxial” system.

State & Federal Regulations Compared

The main differences between the new state and federal regulations involve the throughput rate at which use of a vapor balance system is required; compliance deadlines; notifications; and testing requirements. To understand how these different requirements may apply to your facility, refer to the information below and to the chart on the reverse. Where the state rule is more stringent than the federal rule in terms of operational requirements or compliance deadlines, only the state requirements are shown on the chart.

1. Requirements Related to Throughput Rate:

If your GDF has a monthly gasoline throughput of 10,000 gallons or more, you are required to use submerged fill under both sets of rules, and, under the state rules, you are also required to operate a vapor balance system. Under the federal rules, you are only required to operate a vapor balance system if your GDF has a monthly gasoline throughput of 100,000 gallons or more.

2. Compliance Deadlines: To determine when you must comply with any new requirements, you must first determine whether your GDF would be classified as a “new” or “existing” facility under each set of rules. On the chart, we use the following classifications:

- **“New State”** – A GDF that began, or will begin, operation on or after August 1, 2007.
- **“Existing State”** - A GDF that began operation before August 1, 2007. (Note, most “existing state” facilities in Duval, Orange, Hillsborough, Pinellas, Palm Beach, Broward, and Miami-Dade counties have long been required to use submerged fill and operate vapor balance systems. These facilities are not subject to any new state requirements)

- **“New Federal”** – A GDF on which construction (or “reconstruction” as defined in EPA rules) commenced, or will commence, after November 9, 2006.
- **“Existing Federal”** – A GDF on which construction commenced on or before November 9, 2006.

3. Notifications: The federal rules may require submittal of an “Initial Notification” and a “Notification of Compliance Status” to EPA. The state rules do not require submittal of any notifications. EPA is expected to post example notification forms at the following website: <http://www.epa.gov/ttn/atw/area/arearules.html>. You should mail any notifications required under the federal regulations to:

U.S. Environmental Protection Agency, Region 4
Air Toxics & Monitoring Branch
61 Forsyth Street SW
Atlanta, Georgia 30303-8960

4. Testing: If your GDF has a monthly gasoline throughput of 100,000 gallons or more, and you begin operating a vapor balance system after January 10, 2008, the federal rules require you to periodically conduct certain tests to check for proper operation of the vapor balance system. The state rules do not require this testing.

For Further Assistance:

If you have questions on the state rules, you may call the DEP’s Small Business Environmental Assistance Program at 1-800-722-7457.

If you have questions on the federal regulations, you may call EPA Region 4 in Atlanta at 404-562-9131.



NEW AIR REGULATIONS FOR GASOLINE DISPENSING FACILITIES

The Florida Department of Environmental Protection (DEP) adopted new, statewide air pollution control regulations for gasoline dispensing facilities (GDFs) in 2007. We enclosed an informational flyer about these new rules in last year’s DEP Tank Registration notification.

In January 2008, the U.S. Environmental Protection Agency (EPA) adopted new federal regulations for gasoline dispensing facilities. The new federal regulations are similar to the state rules, but contain some important differences.

We have prepared this flyer to give you a basic understanding of the new federal requirements and also to serve as a reminder of the DEP rules which went into effect last year. You must comply with both sets of regulations.

The chart on the reverse side summarizes the requirements of both rules. Note: in describing the system for returning gasoline vapors displaced during loading of a GDF storage tank to the tanker truck, the state rules use the term “Stage I vapor recovery system,” while the federal regulations use the term “vapor balance system.” For simplicity, we use the single term “vapor balance system” throughout this flyer.

Caution: this flyer does not include all rule details and should not be relied on to ensure full compliance of your operations with the applicable regulations.

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