

Vapor Recovery Rule Updates in the St. Louis Area

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Air Pollution Control Program

Overview

- 10 CSR 10-5.220 Rule Amendment
- 10 CSR 10-5.220 Enhanced Vapor Recovery Implementation
- Hazardous Waste Program Testing Overlap with 10 CSR 10-5.220

Vapor Recovery Rule Amendment Overview

- Proposed amendment to 10 CSR 10-5.220 “*Control of Emissions During Petroleum Liquid Storage, Loading, and Transfer*”
- The Missouri Air Conservation Commission voted to adopt the amendment on 11/29/2018
- The amendment will become effective on **03/30/2019**
- Affects gasoline dispensing facilities and gasoline distribution facilities in St. Louis City, and Jefferson, St. Charles, Franklin, and St. Louis Counties

Vapor Recovery Rule Amendment*

Definitions

- Gasoline Dispensing Facility (GDF) – Any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle and is not-
 - A gasoline distribution facility; or
 - A manufacturer of new motor vehicles performing initial fueling operations dispensing gasoline into newly assembled motor vehicles equipped with onboard refueling vapor recovery (ORVR) at an automobile assembly plant while the vehicle is still being assembled on the assembly line.

***Effective March 30, 2019**

Vapor Recovery Rule Amendment*

Definitions

- Gasoline Distribution Facility – Any facility that receives gasoline by pipeline, ship or barge, or cargo tank and subsequently loads the gasoline into gasoline delivery vessels for transport to gasoline dispensing facilities.

***Effective March 30, 2019**

Vapor Recovery Rule Amendment*

Gasoline Distribution Facilities

- The low throughput exemption (monthly throughput $\leq 120,000$ gallons on an annual average) will be met by maintaining records instead of providing an annual notification
- Facilities that have had monthly throughputs $> 120,000$ gallons on an annual average are no longer permanently affected (i.e. facilities could claim the exemption going forward)

***Effective March 30, 2019**

Vapor Recovery Rule Amendment*

Gasoline Dispensing Facilities

- No construction permits issued
- No operating permits issued
 - A pressure decay test and test of the pressure/vacuum valves will still be required every three years for GDFs with stage I vapor recovery systems in St. Louis area. 7-day notification to the Department is still required
- No permit/notification fees

***Effective March 30, 2019**

Vapor Recovery Rule Amendment*

Gasoline Dispensing Facilities

- Construction notifications will be required for new installations and complete replacements of stage I vapor recovery systems
 - 14-day notice
 - Construction must be complete in 180-days
 - Pressure decay and pressure/vacuum valve testing required within 30-days of construction completion
 - 7-day notification to the Department is still required for post construction testing

***Effective March 30, 2019**

Vapor Recovery Rule Amendment*

Gasoline Dispensing Facilities

- Construction notifications will be required for partial modifications to existing stage I vapor recovery systems prior to installation
 - Construction must be complete in 180-days
 - No test required after construction completion

***Effective March 30, 2019**

Vapor Recovery Rule Amendment*

Gasoline Dispensing Facilities

- Where to send construction permit applications, construction notifications, testing notifications, and test results
 - In St. Louis City, and Jefferson, St. Charles, Franklin Counties send to the Gasoline Vapor Recovery Unit at the St. Louis Regional Office
linda.wegrzyn@dnr.mo.gov
 - In St. Louis County, send to St. Louis

***Effective March 30, 2019**

Enhanced Vapor Recovery Implementation Background

- GDFs in the St. Louis area subject to 10 CSR 10-5.220 *Control of Petroleum Liquid Storage, Loading and Transfer* must install 98% efficient enhanced vapor recovery (EVR) equipment on all gasoline storage tanks between 1,000 gallons and 40,000 gallons
- In 2016, the Missouri Department of Natural Resources started an implementation schedule for installation of 98% efficient Stage I gasoline vapor recovery equipment that would coincide with the upcoming changes to the Hazardous Waste Program's rules

Enhanced Vapor Recovery Implementation Language Revision

- Starting January 2, 2019, all stage I vapor recovery components must be compliant with the rule for any GDF that that modifies a stage I vapor recovery system or performs a required pressure decay test. A GDF must replace all non-EVR components prior to completing the construction project or required testing
- By December 31, 2020, all stage I vapor recovery equipment in place at GDFs must be compliant with 10 CSR 10-5.220

Hazardous Waste Program Testing Overlap With 10 CSR 10-5.220

- Hazardous Waste Program requires testing of spill buckets and drop-tube overfill prevention devices
- The Hazardous Waste Program testing in itself does not require notification to the Gasoline Vapor Recovery Unit
- A construction notification/permit will be required if replacement of a stage I vapor recovery system component or components occurs as a result of the Hazardous Waste Program testing

Hazardous Waste Program Testing Overlap With 10 CSR 10-5.220

- The stage I vapor recovery system replacement component must be on the list of approved equipment located at <https://dnr.mo.gov/env/apcp/vaporrecovery/index.html>
- The form must be submitted to the Gasoline Vapor Recovery Unit or to St. Louis County
- After March 30, 2019, partial modifications to stage I vapor recovery systems will only require a notification form. The construction notification can be submitted by e-mail on the same day as the test/replacement is done.

Questions???

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