

**AIR POLLUTION CONTROL DISTRICT  
COUNTY OF SAN DIEGO**

**DRAFT PROPOSED AMENDMENTS TO  
RULE 61.2 – TRANSFER OF ORGANIC COMPOUNDS  
INTO MOBILE TRANSPORT TANKS**

**WORKSHOP REPORT**

The San Diego County Air Pollution Control District (District) held a public webinar on November 19, 2020, to discuss and receive input on the draft proposed amendments to Rule 61.2 – Transfer of Organic Compounds into Mobile Transport Tanks. A meeting notice was mailed to each permit holder that may be subject to the rule and chamber of commerce in the region, as well as the U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB). Additionally, a meeting notice was posted on the District’s website and distributed to interested parties including through the County of San Diego’s electronic mail service.

The workshop was attended by 22 people. A summary of the comments and District responses are provided below:

**1. WORKSHOP COMMENT**

Does the rule also apply to the transfer of diesel into mobile transport tanks?

**DISTRICT RESPONSE**

The rule would apply to the transfer of diesel if diesel is transferred into a mobile transport tank that previously held gasoline or other VOC-containing fuel (a practice known as switch loading) potentially displacing or generating VOC vapors.

**2. WORKSHOP COMMENT**

What type of fuels are classified as VOC and therefore subject to the rule?

**DISTRICT RESPONSE**

Gasoline and/or ethanol fuel are the main types of fuels subject to this rule. Additionally, any fuel that meets the definition of “VOC” as defined in Rule 61.0 – Definitions Pertaining to the Storage and Handling of Organic Compounds would be subject to the rule.

**3. WORKSHOP COMMENT**

What types of permitted facilities may be subject to Rule 61.2?

**DISTRICT RESPONSE**

Examples of permitted facilities that may be subject to this rule include: a) private companies and military installations that load gasoline and/or ethanol into intermediate refuelers to provide fuel to on-site equipment; and b) bulk plant and bulk terminals that load gasoline and/or ethanol into mobile transport tanks for distribution to other facilities or gas stations throughout the county.

**4. WORKSHOP COMMENT**

The proposed amendments to Rule 61.2 lower the applicability of the rule to mobile transport tanks having a capacity of greater than 120 gallons. Does the 120-gallon capacity threshold also apply to the stationary storage tanks?

**DISTRICT RESPONSE**

The proposed 120-gallon capacity threshold applies only to the capacity of the mobile transport tanks.

**5. WORKSHOP COMMENT**

How did the District determine the proposed emission limit of 0.08 pounds of non-methane organic compounds (NMOC) per 1,000 gallons of VOC loaded specified in Subsection (c)(6)(i)?

**DISTRICT RESPONSE**

As described in EPA Comment No. 11 below, EPA determined, based on the limits specified in analogous rules in other California air districts, that the emission limit of 0.08 pounds of NMOC per 1,000 gallons is feasible and should be included in the rule.

**6. WORKSHOP COMMENT**

How did the District determine the requirement for the 95% control efficiency specified in Subsection (c)(9)(i)? Is splash loading allowed?

**DISTRICT RESPONSE**

The proposed 95% control efficiency specified in Subsection (c)(9)(i) is consistent with the control efficiency found in analogous rules in other California air districts. Splash loading is not allowed since existing Subsection (c)(10) requires that all VOC transfers into mobile transport tanks be done by submerged loading.

**7. WORKSHOP COMMENT**

How would compliance with the proposed 95% control efficiency specified in Subsections (c)(9)(i) and (c)(9)(ii) be verified?

**DISTRICT RESPONSE**

Compliance would be determined by verifying that there is a CARB-certified vapor recovery system (certified to control 95% of vapors) installed at the bulk plants or bulk terminals, and that there is a CARB-certified vapor recovery system installed on the mobile transport tank. The control efficiency will not be separately measured or calculated.

**8. CARB COMMENT**

CARB has no official comments at this time.

**9. EPA COMMENT**

The District should remove the exemption from the bottom loading requirements for transfers conducted by the military specified in Subsection (b)(5).

**DISTRICT RESPONSE**

The District agrees and has proposed deleting the military's exemption from the bottom loading requirements as recommended.

**10. EPA COMMENT**

The District should lower the existing 550-gallon applicability threshold for mobile transport tanks.

**DISTRICT RESPONSE**

The District agrees and has proposed lowering the applicability for mobile transport tanks to greater than 120 gallons as recommended, consistent with the definition of "Cargo Tank" as specified in the California Vehicle Code Section 34003.

**11. EPA COMMENT**

The District should lower the emission factor specified in Subsection (c)(6)(i) to 0.08 pounds of NMOC per 1,000 gallons of VOC loaded to be consistent with analogous rules of other California air districts.

**DISTRICT RESPONSE**

The District agrees and has proposed lowering the emission factor as recommended.

AMF:jl  
11/25/20