

## **Q & A s on Organic Liquids Distribution ICR**

**Subject:** Information Collection Request (ICR) for the Organic Liquids Distribution Industry mailed to industry on April 29, 1998.

**Purpose:** The purpose of this material is to give all ICR recipients information on the major questions raised by others.

**Background:** Below are answers to major questions identified by participants of a June 3, 1998-workshop on the subject ICR. Participants at the workshop asked that the EPA clarify, reconsider, or develop a response to these questions. These questions also represent the major questions raised in phone calls and E-mail messages addressed to the EPA. Industry representatives have reviewed the questions and draft answers and their comments have been considered and incorporated as appropriate in the answers below. The Q&A also includes a request for SIC codes for the facilities reporting information.

**Additional Information:** EPAs Internet site ([www.epa.gov/ttn/oarpg/t3sp.html](http://www.epa.gov/ttn/oarpg/t3sp.html)) for staff papers on Air Toxics contains the following additional information on this ICR:

- 1) April 29, 1998-letter, enclosures, ICR, and mailing list,
- 2) May 22, 1998-additional instructions,
- 3) June 11, 1998-letter extending the due date for ICR responses, and
- 4) This Q & A.

**Q-1. Unloading and Intra-Site Transfers.** Some respondents found the text and tables of the survey unclear and inconsistent on whether *unloading* equipment (racks, arms, pumps, etc.) used for *incoming* liquids are to be surveyed. Commenters questioned why the corresponding transfer rack should be surveyed, claiming that it is not an emission source. Other questioners asked whether liquid transfers within a plant site boundary should be included.

**Ans:** To fully understand the organic liquids distribution industry the EPA needs to have information on the volumes of liquids entering a facility, as well as on the equipment associated with incoming liquid transfers. The liquid materials entering a distribution facility may generate emissions of organic HAP at loading racks, from transfer equipment

components (equipment leaks), as well as storage tanks. Emission controls on these activities may include vapor balance, storage tank controls (for example, a floating roof or control device), or other measures.

The EPA agrees with the idea to focus and limit the survey responses on unloading and some loading operations where the only reportable information is on potential equipment leak sources as described below. Potential equipment leak components used for loading or unloading do not have to be reported in Tables 1, 2, and 7 for the following three cases:

**Case 1:** Do not report potential equipment leak components (valves, fittings, pumps, etc.) for incoming or outgoing **dedicated** piping that transfers organic liquids to or from, respectively, a storage vessel or process unit *covered by other MACT standards*<sup>1</sup>.

Examples of Case 1 include:

(i) **Pipeline** equipment used to directly transfer organic liquids across plant-site boundaries into or out of storage vessels *covered by other MACT standards* or process unit components that are not storage vessels (ex, distillation columns).

(ii) **Unloading** equipment used to transfer organic liquids **from tank trucks, railcars, or other containers** into a storage vessel *covered by other MACT standards* or process unit components that are not storage vessels (ex, distillation columns).

**Case 2:** If the **only reportable** HAP emission sources for the entire plant site are **potential equipment leak sources** from equipment (valves, fittings, pumps, etc.) used for unloading or loading organic liquids then that plant site will not have to respond to the survey.

**Case 3:** *Intra-site transfers and storage.* Do not report that dedicated equipment used to transfer and store organic liquids between on-site process units.

For all other cases, industry must fill out all applicable tables for loading and unloading equipment.

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<sup>1</sup> Note: For the purposes of this Q&A, “*covered by other MACT standards*” has the same meaning as discussed and limited in the May 22, 1998 *Additions to Instructions*, section K. As discussed in those instructions, *other MACT standards* may include under specified conditions standards that are under development and have not been released as final MACT standards. See those additional instructions for the specified conditions.

- Q-2. **Incoming fuels and other products stored and consumed on the plant site.** Several workshop participants requested clarification on what would have to be reported for incoming fuels and other liquids that are stored and/or consumed on the plant site.

**Response:** All incoming or outgoing HAP-containing organic liquid distribution activities should be reported because these operations are part of the organic liquid distribution industry (unless they are non-surveyed liquids, are *covered by other MACT standards*, or are one of the cases presented in Q-1 above). This includes any fuels (non-gasolines), solvents, or feedstocks. Fill out all tables within the ICR as appropriate to provide the required information.

- Q-3. **Compressed Gases.** Does the survey cover materials that are gases at standard conditions, but are compressed/cooled to be loaded as a liquid?

**Ans:** Gases containing HAP that are compressed to a liquid for storage, shipping, or transfer purposes may have the potential for HAP emissions from equipment leaks. If the liquid is a HAP or contains HAP, and the applicability criteria are satisfied (plant is a large emitter, it is a surveyed liquid, and the activity is not *covered by other MACT standards*), the operation should be reported in the survey.

- Q-4. **Major/Non-Major Sources.** Does the survey cover plant sites that exceed the 5/12.5 tons/year (tpy) criteria (actual emissions), but have previously received a non-major HAP source permit (less than 10/25 tpy of potential to emit (PTE) HAP emissions)?

**Ans:** The survey was shortened originally to focus on major sources of HAP. The criteria of actual emissions instead of PTE emissions was used to determine non-major sources to simplify the survey calculations and side-step many of the PTE issues. In response to the above question, if the plant site has received an enforceable non-major source permit based on PTE of HAP, it does not need to respond to the survey, despite its actual emissions total being between the 5/12.5 tpy criteria for large emitters and the PTE 10/25 tpy criteria for major sources.

- Q-5. **Marine Loading Operations.** Are (a) *unloading operations* or (b) *ballast water* at marine vessel facilities covered in the survey?

**Ans:** (a) The Marine Vessel Loading MACT rule (40 CFR 63, subpart Y) does not regulate liquid unloading (from the marine vessel onto the plant site). Subpart Y also does not affect equipment components associated with liquid transfer operations into or out of a facility. As discussed in section I.D.1 of the original ICR instructions and in case # 2 in Q-1 above, if there are no other reportable HAP emissions at a marine vessel unloading plant site, except potential equipment leak components, then that plant site does not have

to respond to this ICR. However, if there are other emission sources on the plant-site then the equipment leak components should be reported (Table 7 "Equipment Leak Control Data") and the other emission sources on applicable Tables.

(b) In development of Subpart Y standard, it was decided that control of ballasting (the introduction of ballast water into a cargo tank of a tankship or oceangoing barge) was not warranted under the MACT program. Those ballasting operations do not need to be reported in the OLD survey. However, in cases where nonsegregated (contaminated) deballast water (pumped from the tankship or oceangoing barge onto the plant site) is treated on site, it should be included in Table 4 "Wastewater Flow Rates and Drain Controls" and Table 5 "Wastewater Collection and Treatment Control."

- Q-6. **Gas Plants.** One commenter pointed out that the definition of custody transfer states that one point of custody transfer is the point at which natural gas enters a natural gas processing plant. Are such gas plants to be included in the OLD survey because they load products derived from natural gas into tank trucks?

**Ans:** As noted in the instructions to the survey (section I.B.2 of the ICR instructions), this survey does not plan to cover natural gas facilities. Natural gas operations at gas plants fall into that statement and are currently being considered for control under the proposed Oil and Gas MACT; however, if the product is considered a natural gas liquid and is past the point of custody transfer then those distribution activities are not controlled by the Oil and Gas MACT and should be reported in all applicable survey Tables at facilities meeting the large emitting size criteria for this survey (in section I.A of the ICR instructions).

- Q-7. **Asphalt Loading.** Asphalt satisfies the 0.1 psia criterion at conditions of loading (275°F and sometimes with added solvent to facilitate transfer), and so could be considered a surveyed liquid. However, at ambient temperatures, the vapor pressure is well below the cutoff. Is asphalt then a surveyed liquid for this survey?

**Ans:** The EPA believes that true vapor pressure should be determined at the temperature of storage, handling, or processing, and not at standard conditions. Respondents are requested to note temperature or other conditions used to determine the vapor pressure on Table 1. If asphalt loadings emit HAP and meet the survey criteria at loading conditions, they should be included in the reporting.

- Q-8. **Gasoline Additive Tanks.** Gasoline additives are stored at bulk gasoline terminals in relatively small tanks (mostly below 5,000 gallons), and have vapor pressures below about 0.25 psia (but over the 0.1 psia cutoff in the survey). In addition, they are not distributed out of the plant site except as a component of the gasoline. If such additives are included, this would bring in many such terminals that would otherwise not have to report. Given these considerations, does the unloading and storage of these additives need to be

reported?

**Ans:** Similar to other areas of the survey, the EPA agrees to limit and focus the survey responses in this area. Bulk gasoline terminals whose only reportable liquids are gasoline additives that have a true vapor pressure of  $\leq 0.25$  psia are excluded from reporting in the survey.

- Q-9. **Liquid Property Parameters.** Respondents were unclear as to whether annual average values of liquid properties (such as true vapor pressure and HAP content) should be used in deciding what to consider as a surveyed liquid and in filling out Table 1 (Organic Liquids Handled and HAP Content) of the survey. They also stated that some liquids naturally vary in HAP content. One respondent commented that specific products may at different times have noticeably different HAP contents.

**Ans:** The EPA believes that the points advanced by one of the commenters constitute an appropriate answer. The commenter suggested that for products with intentionally different characteristics, consider each as a separate liquid (and report separately the best representative values for each liquid). For specific products whose properties vary unintentionally over time, use annual average values. This approach should avoid the situation of some products jumping “into” and “out of” the survey, depending on which batch is considered. As discussed under Q-7, true vapor pressure should be determined at the temperature of storage, handling, or processing, and not at standard conditions. Also, respondents are requested to note temperature or other conditions used to determine the vapor pressures on Table 1.

10. **Correction/clarification on reporting HON regulated equipment.** Specifically for the HON, on page 5 of the ICR instructions, section I.E.3 the first sentence incorrectly suggests the reporting of HON-regulated equipment and not reporting requested data. The first sentence should read: 3. List in Table 2 all distribution storage vessels not regulated by the HON because they are part of a non-HON regulated process unit. We are requesting full reporting of non-HON regulated storage vessels. HON-regulated storage vessels and transfers are requested to be shown in appropriate circumstances on plot plans, as discussed in the May 22, 1998 additional instructions.

NOTE: This particular section was written specifically for the HON in the original instructions. Since that time, it has been decided per the May 22, 1998 additional instructions that storage vessels, transfer equipment, etc. that are *covered by other MACT standards* could be excluded from the ICR Tables. As discussed in the additional instructions, *other MACT standards* may include under specified conditions standards that are under development and have not been released as final MACT standards. See those additional instructions for the specified conditions.

July 2, 1998

Q-11. **Equipment Leak Data on Table 7.** Many recipients of the ICR have asked the EPA to clarify whether they should report in Table 7 all equipment in organic liquid service at their facility, or just the distribution equipment.

**Ans:** The EPA is requesting that Table 7 be filled out only for equipment in organic liquid distribution service.

12. **SIC Facility description.** The EPA inadvertently did not request the Standard Industrial Classification (SIC) codes for the reporting facilities. We will need the SIC codes for many types of environmental and economic analyses to be performed for developing the MACT standards. The EPA requests that facilities filling out the ICR provide and note their primary and any secondary SIC codes. Recipients of the ICR should report the SIC code in the written description of the distribution facility operations.