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# Working Group Meeting #4

## Proposed Rule 1188 – Vacuum Truck Operations

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South Coast Air Quality Management District

Kennard Ellis

November 20, 2014

# Agenda

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- Introductions
- Continuation of Draft Survey Discussions
- POTW Related Activities
- Other Discussion Points
- Preliminary Rule Development Schedule



# Continuation Draft Survey Discussions

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- Survey Distributed Electronically
- Survey Forms to Address Input From:
  - Affected Facilities
  - Vacuum Truck Operators
- Characterization of Vacuum Truck Industry
  - Types of Material Transferred
  - Volume of Materials Transferred by Type
  - Control Equipment Usage Frequency and Type
  - Truck Inventory
  - Typical Operations vs. Situational / Emergency Activities
  - SCAQMD Permit Status



# Continuation Draft Survey Discussions

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- Feedback
  - Met Separately With:
    - Southern California Association of POTWs (SCAP)
    - Western States Petroleum Association (WSPA)
  - Initial Discussions to Highlight and Address Concerns



# Continuation of Draft Survey Discussions

Issue	Concerns
Pre-work safety and hazard assessment	Confidentiality
Checklists, procedures or other criteria used to minimize truck emissions or nuisance potential	Facilities being responsible for contracted operations and hence resulting in duplication of efforts
Information and data reporting period of 12 months	Historical information and data not easily accessible due to lack of requirements to maintain records
(Form 1); footnote: “Other Material” Amend to maintain consistency with rule language and read “other material with water content of <90% and total v.p. >25.8mmHg (0.5 psia)”	Unwarranted level of specificity given that emissions data have not been collected for all the different materials transferred
Exemption	Establish Exemption Threshold



# Continuation of Draft Survey Discussions

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- Final Survey Document to be Distributed
- Submittal Date - January 6, 2015
- Individual Meetings to be Scheduled Leading up to Submittal Date



# Other Discussion Points

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- Schedule Site Visits
  - Observe Vacuum Truck Operations
  - Become Familiar with Vacuum Tanks
- Conduct Comparison Tests to Evaluate VOC Emissions Associated with Vacuum Truck Transfers Utilizing:
  - Positive Displacement (PD) Pump and
  - Blower
- Continue to Evaluate Crude Oil
  - Evaluate Survey Data to Estimate
    - Crude Oil Transferred by Vacuum Trucks
    - VOC Emissions Associated with (Vacuum Truck) Transfers



# Preliminary Rule Development Schedule

Item	Action	Target
Vacuum Truck Activities at Affected Facilities	Form Working Group to: <ul style="list-style-type: none"> <li>▪ Study Vacuum Truck Activities</li> <li>▪ Conduct Source Testing</li> </ul>	May 2014 thru January 2015
Control Technology Application		
Field Visits		
Milestones	Collect Data and Use to Estimate VOC Emissions	January 6, 2015
	Public Workshop	1Q 2015
	Set Hearing	2Q 2015
	Final Hearing	2Q 2015
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