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Petroleum Storage Tank Insurance Fund PO Box 104116 Jefferson City, MO 65110



ST. LOUIS CITY AND JEFFERSON, ST. CHARLES, FRANKLIN, AND ST. LOUIS COUNTY OWNERS & EQUIPMENT COMPANIES

INPORTANT NOTICE FOR GASOLINE DISPENSING FACILITIES



The Missouri Department of Natural Resources (MoDNR)

is proposing changes to its air pollution rule for "gasoline dispensing facilities" (GDFs) in St. Louis City and Jefferson, St. Charles, Franklin, and St. Louis Counties. We believe most of the proposed changes will be welcomed by PSTIF-insured tank owners. Items of particular interest are:

- The requirement for existing GDFs to obtain and maintain an operating permit for Stage I vapor recovery equipment would be eliminated, as would the \$100 fee. Recurring three-year testing would still be required.
- For new USTs or complete replacements of Stage I vapor recovery systems
 - o The requirement to obtain a construction permit would be eliminated, as would the \$100 fee;
 - o The timeframe for advance notice of installation would be reduced from 30 to 14 days, (which would match MoDNR's UST rule); and
 - o Pressure decay and pressure/vacuum valve tests would still be required.
- When making a minor modification to a UST system, (such as replacing a spill bucket), the requirement to pay a \$100 fee would be eliminated. Advance notice of the modification would still be required.
- The requirement to conduct a pressure decay test and a pressure/vacuum valve test after a minor modification, (such as replacing a spill bucket), would be eliminated.
- A broader array of pressure/vacuum valves would be allowed. (The current rule requires pressure/vacuum valves be certified at 3" water column pressure and 8" water column vacuum. The proposed rule would require pressure/vacuum valves have a positive pressure setting of 2.5-6.0" of water and negative pressure setting of 6.0-10.0" of water.)
- USTs between 500 and 550 gallons would be exempt from the rule. (Submerged fill pipe, vapor tight caps and fittings, and CARB-approved p/v valve would not be required.)
- A bulk plant with average monthly gasoline throughput ≤120,000 gallons in a given year would no longer be required to submit an annual report to maintain its exemption from certain requirements; records of throughput would still have to be maintained and made available upon request. Also, if throughput shrinks below this threshold, the bulk plant would no longer be subject to the requirements applicable to larger volume facilities. (These facilities would still be required to have submerged fill pipes.)

Public Hearing — September 27, 2018

If you wish to comment on these proposed changes, you may do so at a public hearing scheduled for 9:00 a.m. on *September 27, 2018,* at the Elm Street Conference Center, 1730 East Elm Street, Jefferson City, Missouri, or by sending written comments to <u>apcprulespn@dnr.mo.gov</u> or MoDNR, PO Box 176, Jefferson City, MO 65102, *no later than October 4, 2018*. This summary is for information only and is not an official statement nor intended to contain all information in the proposed rules. For more information on the proposed changes to the rule, see www.dnr.mo.gov/proposed-rules.