

## Rule Interpretation Memos for 30 TAC 115, Loading and Unloading of Volatile Organic Compounds

- ! [Determination of applicability of Title 30 TAC §115.214\(a\)\(3\) when claiming the exemption in §115.217\(a\)\(3\) -Retired](#) [July 21, 1999]  
Modified due to amendments to the regulation changing §115.217(a)(5) to §115.217(a)(3).
- ! [Revision - Appropriateness of Test Method 27 for Tank Trucks operating above atmospheric pressures](#) [August 31, 1999 ]
- ! [Determination of whether transfer of liquid cargo from one marine vessel to another is subject to any requirements in §§115.211-219 - Retired](#) [July 21, 1999]
- ! [Determination if exempt from §115.212, are loading operations required to stop when emissions occur from open vent and gauge lines -Retired](#) [July 21, 1999]
- ! [Revision - Determination for "shore based equipment" in §115.214\(a\)\(4\)\(E\) when transferring product directly from pipeline to ship](#) [August 31, 1999]
- ! [Revision - Determination of applicable requirements for pigging operations at marine transfer facilities](#) [August 31, 1999]
- ! [Definition of liquified petroleum gas \(LPG\) - Retired](#) [March 5. 2002]

Last Modified: March 5, 2002

**Determination of applicability of Title 30 TAC §115.2214(a)(3) when claiming the exemption in §115.217(a)(3) [Code R5-211.001]**

Retired as a result of revisions to 30 Texas Administrative Code Chapter 115 adopted on June 30, 1999 and effective July 21, 1999 (Rule Log No. 98028-115-A1)

Last Modified: July 21, 1999

## Air Rule Interpretation Summary Form

Code Number	R5-211.003
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Appropriateness of Test Method 27 for tank trucks operating above atmospheric pressure	August 31, 1999
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Rule/Regulation Citation(s):	Federal Rule: <u>  </u> State Regulation: <u>  X  </u>
30 Tex. Admin. Code Chapter 115, § 115.214(a)(3)	Description: Subchapter C: Volatile Organic Compound Transfer Operations, Division 1: Loading and Unloading of Volatile Organic Compounds
Interpretation Request:	
Determine if Title 40 Code of Federal Regulations Part 60 (40 C.F.R. Part 60), Appendix A, Method 27-Determination of Vapor Tightness of Gasoline Delivery Tank Using Pressure-Vacuum Test is appropriate for tank-trucks operating above atmospheric pressures (e.g., 30 + pounds per square inch or greater) and propose rule language as necessary.	
Determination:	
The Air Rule Interpretation Team (RIT) has reviewed the leak testing requirements of Title 30 Texas Administrative Code § 115.214(a)(1)(C) [30 Tex. Admin. Code § 115.214(a)(1)(C)] and the test methods referenced in 30 Tex. Admin. Code § 115.235- <i>Approved Test Methods</i> and believes that Method 27 is not appropriate for tank-trucks operating in liquified petroleum gas (LPG) service. Under 30 Tex. Admin. Code § 115.235(a)(4), a reference is made to 49 C.F.R. Part 180.407(h) as approved test methods, and the Air RIT believes the methods are appropriate for ensuring the vapor tightness of these tank trucks.	

Bibliography:

Title 30 Tex. Admin. Code, Chapter 115(1999). (Effective: 7/21/99)

Title 49 C.F.R. §180.407(h).

Title 40 C.F.R. 60, Appendix A, Method 27.

**Determination of whether transfer of liquid cargo from one marine vessel to another is subject to any requirements in §§115.211-219 [Code # R5-211.004]**

Retired as a result of revisions to 30 Texas Administrative Code Chapter 115 adopted on June 30, 1999 and effective July 21, 1999 (Rule Log No. 98028-115-A1)

Last Modified: July 21, 1999

**Determination if exempt from §115.212, are loading operations required to stop when emissions occur from open vent and gauge lines. [Code # R5-211.005]**

Retired as a result of revisions to 30 Texas Administrative Code Chapter 115 adopted on June 30, 1999 and effective July 21, 1999 (Rule Log No. 98028-115-A1)

Last Modified: July 21, 1999

## Air Rule Interpretation Summary Form

Code Number	R5-211.006
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Revision - Determination for “shore based equipment” 115.214(a)(4)(E) when transferring product directly from pipeline to ship.	August 31, 1999
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Rule/Regulation Citation(s):	Federal Rule: <u>  </u> State Regulation: <u>  X  </u>
30 Tex. Admin. Code Chapter 115, § 115.214(a)(3)(F)	Description: Subchapter C: Volatile Organic Compound Transfer Operations, Division 1: Loading and Unloading of Volatile Organic Compounds
Interpretation Request:	
Title 30 Texas Administrative Code § 115.214(a)(3)(F) [30 Tex. Admin. Code § 115.214(a)(3)(F)] requires fugitive emissions monitoring for all “shore based equipment” at marine terminals in the Houston/Galveston area. A determination is needed on how “shore based equipment” is defined, if product is unloaded or loaded directly to or from pipelines onto or off of ships or barges.	
Determination:	
For situations in which product is unloaded or loaded directly to or from pipelines onto or off of ships or barges, “shore based equipment” is determined to be <u>all</u> piping and equipment located between the ship or barge and the pipeline. In the situation where liquefied petroleum gas (LPG) is “tightlined” ( <i>i.e.</i> , unloaded or loaded directly to or from pipelines), shore based equipment would include such units as dehydration and refrigeration systems that are located between the ship/barge and the pipeline.	

Bibliography:

Title 30 Tex. Admin. Code Chapter 115 (1999). (Effective: 7/21/99)

**Retired as a result of revisions to 30 Texas Administrative Code  
Chapter 115 adopted on December 6, 2000 and effective on  
January 18, 2001 (Rule Log No. 2000-011i-115-A1)**

Last Modified; March 5 2002

## Air Rule Interpretation Summary Form

Code Number	R5-211.008
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Revision - Determination of applicable requirements for pigging operations at marine transfer facilities.	August 31, 1999
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Rule/Regulation Citation(s):	Federal Rule: <u>  </u> State Regulation: <u>  X  </u>
30 Tex. Admin. Code Chapter 115, §§ 115.211 - 219	Description: Subchapter C: Volatile Organic Compound Transfer Operations, Division 1: Loading and Unloading of Volatile Organic Compounds
Interpretation Request:	
Determination of applicability of the loading and unloading of volatile organic compounds (VOC) rules (Title 30 Texas Administrative Code §§ 115.211 - 217, and § 115.219 [30 Tex. Admin. Code §§ 115.211 - 217, and § 115.219]) to pigging activities conducted at marine terminals in which a pig is used to transfer remaining product in a transfer line to a marine vessel or a land-based storage tank.	
Determination:	
<p>Pigging activities that are conducted to move remaining product from transfer lines at marine terminals into marine vessels are considered to be part of the marine loading operation and thus are subject to the loading and unloading of VOC rules (30 Tex. Admin. Code §§ 115.211 - 217, and § 115.219) under 30 Tex. Admin. Code, Chapter 115.</p> <p>Please note that due to the exemptions given in 30 Tex. Admin. Code § 115.217(a)(5)(A)(i), the marine loading requirements of 30 Tex. Admin. Code § 115.212(a) only apply to facilities that are <u>loading into</u> marine vessels located in the Houston/Galveston ozone non-attainment area. Unloading from a marine vessel is exempt from the requirements of § 30 Tex. Admin. Code 115.212(a). Also, for periods in which pigging is being conducted for maintenance reasons (e.g., cleaning, dewatering gas pipelines, hydro testing, etc.), loading operations are not being conducted. The rules for loading and unloading of VOC (30 Tex. Admin. Code §§ 115.211-217, and §115.219) do not apply to pigging for maintenance.</p>	

**Bibliography:**

Title 30 Tex. Admin. Code Chapter 115 (1999). [Effective: 7/21/99]

Evaluation of Testimony for Public Hearing [January 24, 25, 26, and 27, 1994] Regarding Chapter 115 Control of Air Pollution From VOC, Volume 1-6. [Effective: May 27, 1994].

Please note, in the event that an external customer feels that this rule interpretation is in error or a source of information has been overlooked which would change the determination, a request for reconsideration may be submitted. Requests must be submitted on a Reconsideration Process Form which is available at the TNRCC's homepage: <http://www.tnrcc.state.tx.us/air/opd/rmhmpg.htm>, or from any of the air rule interpretation team members.



Rule Interpretation Code Number R5-121.007.

Title 33 Code of Federal Regulations Part 154.

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