



Connecticut Department of Energy and Environmental Protection



Control of VOC Emissions from Aboveground Storage Tanks (AST)

Proposed revisions to RCSA §22a-174-20(a)

SIPRAC

May 10, 2012



Connecticut Department of Energy and Environmental Protection

Proposed Changes to §20(a):

- Based on the OTC model rule with focus on measures that make sense for CT's smaller AST inventory
- No new design requirements are proposed
- **Roof Landing Requirements** —
 - use lowest lander height setting
 - rapid and continuous emptying and filling
- **O₃ Season Degassing and Cleaning Controls** —
 - emissions control during degassing
 - low VOC cleaning agent or steam cleaning
 - controlling exhaust from sludge receiving vessels



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- **Un-domed, external floating roof tanks prohibited**
 - **Limit organic vapor concentration above internal floating roof to 30% of its lower explosive limit**
 - **Enhanced enforcement flexibility for facility-wide leaks**
 - Repair leaks within 15 days after detection
 - **Require external surfaces of ASTs containing VOC to be either mill-finished aluminum or painted white**



- **Pre-public notice draft available for comment**

[Draft Revisions to Section 22a-174-20\(a\)](#)

- **Comments due by June 5, 2012**
- **Questions? Contact:**

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