

Small Storage Tanks

Federal Air Quality Record-keeping Requirement

Status of Permit-by-Rule & Department Approach - 3/10/98

Small Storage tanks built after July 3, 1984 may require a permit.

Alaska Statutes require an operating permit for facilities containing a source subject to a federal standard. One such federal standard requires only keeping records for certain small storage tanks. The department decided that the full permit application procedures were not appropriate for storage tanks that only require a permit because of a federal record-keeping requirement.

ADEC adopts rule to make it easier - But rule is not yet effective

On December 2, 1997, the Department adopted a "Permit-by-Rule" regulation. This regulation satisfies the permit requirement using a simple registration. That permit-by-rule regulation is **NOT YET EFFECTIVE**. The Department does not expect the rule to be effective for several months while the Department of Law completes their review.

What should tank owners do until the rule is effective?

The department recommends the following 5 steps:

1. Verify that the only reason your facility needs a permit is because it contains a tank subject to the federal record-keeping requirement. (Contact ADEC Anchorage Air Quality Maintenance office at (907) 269-7577 for more information)
2. Verify that each of the tanks in question were built or modified after July 3, 1984 and fall within the following table:

| Tank Capacity | | Product stored in tank |
|----------------|-------------------|---|
| At least | But not more than | |
| 10,600 gallons | 19,800 gallons | Any volatile organic liquid |
| 19,800 gallons | 39,900 gallons | Volatile organic liquid with a max. true vapor pressure less than 2.18 psia |
| 39,900 | --- | Volatile organic liquid with a max. true vapor pressure less than 0.50 psia |

3. Prepare a written notice to the department explaining how you determined that the tanks met the above requirements. The notice must also include the name and address of the facility, a brief description of the facility, and the statement "Based on information and belief formed after reasonable inquiry, I certify that the information in this notification is true accurate, and complete."

4. Sign and notarize this statement, and send the entire notice to:

ADEC Air Quality Maintenance
Kb Record-keeping Tank
555 Cordova St.
Anchorage, AK 99501

5. Keep at your facility a copy of the notice you sent, a record of the dimensions of each storage tank, and a calculation of the capacity of the tank.

The department will notify you when the "permit-by-rule" is effective and send you a copy. The permit-by-rule requires you to keep the records under (5) above for the life of the storage tank. You should be able to uniquely identify each tank for which you are keeping records.

If your storage tanks are built before 1984 or don't meet the criteria above

If your storage tank was built before July 3, 1984, you may need a permit if:

- the tank is built after May 18, 1978, has a capacity of 40,000 gallons or more, and stores petroleum liquids other than #2 - #6 diesel or fuel oil

OR

- The tank is located in the Port of Anchorage.

OR

- Your facility needs a permit for some other reason.

If you think you might need a permit or to get more information, please contact ADEC Anchorage Air Quality Maintenance office at (907) 269-7577 for more information.