

# **Georgia Department of Natural Resources**

Environmental Protection Division, Air Protection Branch  
4244 International Parkway, Suite 136, Atlanta, Georgia 30354

Lonice C. Barrett, Commissioner  
Carol A. Couch, Ph.D., Director  
404-363-7028

**MEMORANDUM:**

May 6, 2004

ATTN: Gasoline Supply and Transporter Stakeholders

SUBJECT: Gasoline Marketing / Transport / Stage I Vapor Recovery Rule Reminder

Dear Stakeholder:

The Georgia Environmental Protection Division (EPD) would like to take this opportunity to remind you of several Georgia Rules for Air Quality that are applicable to your firm and/or facility during the 2004 ozone season and beyond. Please find attached Question & Answer Documents regarding three current rules. These three rules include the Georgia Gasoline Marketing Rule, the Gasoline Transport Rule, and the Stage I Vapor Recovery Rule.


The Gasoline Marketing Rule requires that seasonal Reid Vapor Pressure (RVP) and sulfur limits be met for gasoline sold in the 45-county fuel-control area. Gasoline in the fuel-control area must have and demonstrate a RVP no greater than 7.0 psi. To help ensure compliance, EPD is advising transport companies and jobbers to track and anticipate the actual needs of low-turnover locations to avoid the unwanted random testing failures as well as the enforcement actions resulting from these failures. Bills of Lading (BOL), as provided by the terminal of origin, must be appropriately labeled to reflect the composition of the gasoline being delivered. For gasoline delivered into the 45-county fuel-control area for use during the seasonal control period, June 1 – September 15, **GA-LS-A/RVP** or similar labeling is required. For gasoline delivered into the 45-county fuel-control area for use outside the seasonal control period, **GA-LS-A** or similar labeling is required. **EPA-CONVENTIONAL gasoline is prohibited from being sold to an ultimate consumer in the 45-county fuel-control area.** Copies of the BOL reflecting fuels delivered to end retail locations should be left with facilities as well. A map of the 45-covered counties can be found on the attached Gasoline Marketing Rule Q&A.

The Gasoline Transport Rule requires that gasoline transport companies that operate in the 13 counties register with EPD and submit passing results of annual vapor tightness test required to be performed on the transport vehicles. These 13 counties are indicated on the attached map. Please also see the attached memorandum regarding the Gasoline Transport Rule regarding how to register and what forms to file.

EPD is also reminding any transport companies, jobbers, as well as retail stations and industry associations of the Gasoline Stage I Vapor Recovery Rule requirements. Vapor Recovery hoses should be connected before connecting gasoline delivery hoses at facilities located within the same 13 counties covered by the Gasoline Transport Rule. Please see the attached Gasoline Stage I Vapor Recovery Q&A for additional information.

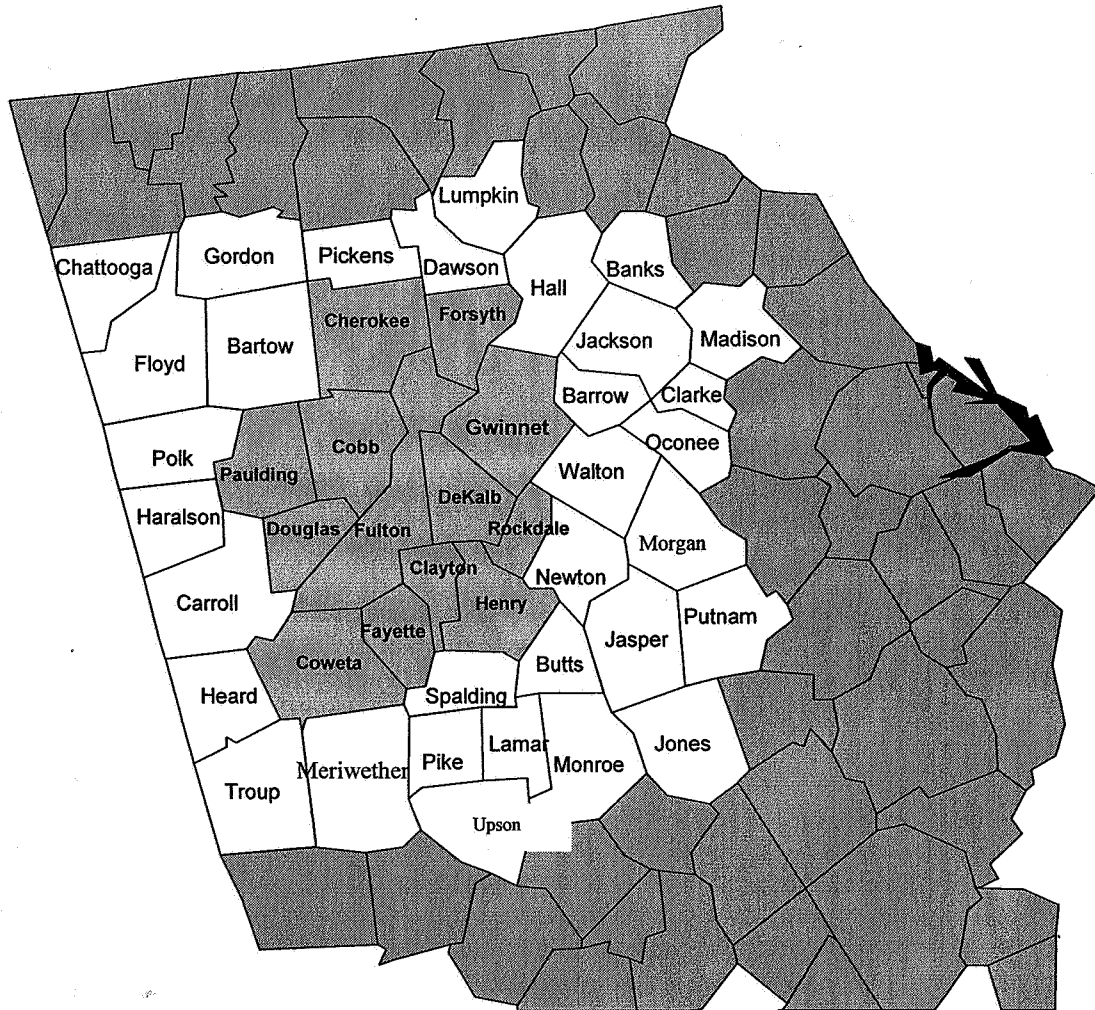
Compliance with the Rules for Air Quality Control help to ensure cleaner air in metro Atlanta, especially during the summer ozone season. We appreciate everyone's help in reaching the goal of clean air. If you have any questions or need any further information, please contact a member of the Fuels unit staff at (404) 363-7028.

Sincerely,



Tim Smith  
Fuels Unit Manager

## Low RVP/Low Sulfur Gasoline Vapor Recovery Area



☐ The total 45 counties will need to comply with the Gasoline Marketing Rule. See Gasoline Marketing Question and Answer Document.

☒ Represents the current 13 counties designated as nonattainment for the one-hour ozone standard. Requirements in these counties include STAGE I Vapor Recovery hookup, Gasoline Transport Vehicle Inspection Reporting, as well as Gasoline Marketing Rule adherence.

☒ As of May 2004, the Georgia Gasoline Marketing, GA Gasoline Transport Vehicle Reporting and Stage I Vapor Recovery rules are not applicable outside the 45-counties.

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Environmental Protection Division, Air Protection Branch

Mobile and Area Sources Program – Fuels Unit

4244 International Parkway, Suite 136, Atlanta, Georgia 30354

Lonice C. Barrett, Commissioner

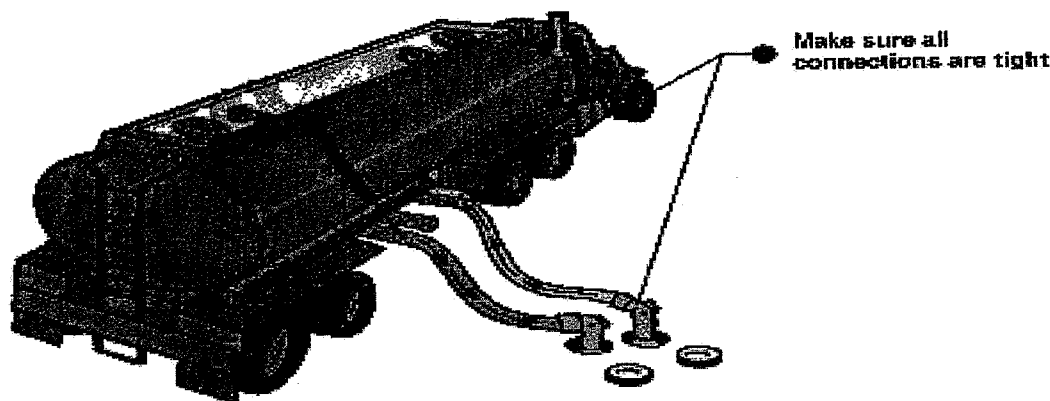
Carol A. Couch, Ph.D., Director

(404) 363-7028

## **Stage I Gasoline Transporters Frequently Asked Questions**

**Q: What must I do when I deliver gasoline to a gas station?**

**A:** You must ensure that your Stage I vapor recovery hose hookups are in place **prior** to unloading your delivery of gasoline. See the picture below.



## **Unloading Your Cargo Tank**

**Q: In which counties am I required to connect my Stage I hookups?**

**A:** The Georgia Rules for Air Quality Control require the use of Stage I vapor recovery hose hookups during loading or unloading operations in the following 13 counties: Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding, and Rockdale. See 13-county map on the back of this page. If you are delivering to a gas station located in a county inside of the 13-county area and it has Stage I equipment installed, you **must** connect your Stage I vapor recovery hose. If you are delivering to a gas station located in a county **outside** of the 13-county area, EPD encourages the use of your Stage I vapor recovery hose for your safety and the benefit of the environment.

**Q: What might happen if my Stage I hookups aren't in place or my transport truck form hasn't been filed with the EPD?<sup>1</sup>**

**A:** Depending on several factors, your company may be cited for the regulatory violation, subjected to a financial penalty, and required to develop a plan to prevent future occurrences.

**Q: Who do I contact if I have further questions?**

**A:** EPD Fuels Unit staff can be reached at 404-363-7028. For general vapor recovery questions, please contact our Petroleum Industry Regulatory Team (PIRT) under Shaheer Muhanna's supervision at 404-362-2697.

<sup>1</sup> EPD has established a team to inspect deliveries made in the 13 counties.

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Carol A. Couch, Ph.D., Director

404-363-7028

May 6, 2004

TO: Gasoline Transport Vehicle Stakeholders

SUBJECT: Gasoline Transport Vehicles Rule

Dear Gasoline Transport Company Manager,

The Georgia Environmental Protection Division (EPD) would like to remind you that you might now be covered under the Gasoline Transport Vehicle rule. As a result of the Gasoline Marketing Program, many additional gasoline transport companies are now operating in the 13-county metro Atlanta area covered under the Gasoline Transport Vehicle Reporting Rule. Gasoline transport companies that operate in the 13 covered counties (as shown on the attached maps) must register with EPD and submit their required annual gasoline tanker vapor tightness testing reports directly to EPD.

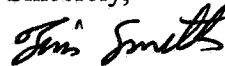
Before the 2001 rules, only the tag numbers of the registered vehicles were required when submitting the annual reports. In order to track these vehicles and process the information more effectively, the rules for Gasoline Transport Vehicles were updated in 2001 as follows:

According to the Georgia Rules for Air Quality Control, Chapter 391-3-1-.02(2)(ss)1.(iv), the owner or operator of the gasoline transport vehicle must submit to the Division within 30 days of the test date a data sheet in the format specified by the Division containing at a minimum the following information: name of person(s) or company that conducted the test, date of test, test results including a list of any repairs made to the transport vehicle to bring it into compliance and the **manufacturer's vehicle identification number (VIN) of the tank truck or frame number of a trailer-mounted tank.**

Please be advised that these rule changes became effective December 26, 2001. There are three forms that you will be required to use - one form for the straight trucks requiring the VIN, one form for the trailer-mounted tank using the frame number, and the repair form (on the back of each of the others) are available in Excel on the EPD website at [http://www.ganet.org/dnr/environ/forms\\_files/epdforms.htm](http://www.ganet.org/dnr/environ/forms_files/epdforms.htm). You may submit the completed Excel form electronically to [Tom\\_Atkinson@mail.dnr.state.ga.us](mailto:Tom_Atkinson@mail.dnr.state.ga.us). Please also fax the **signed** form to (404) 362-2534.

If you have any questions, need a hard copy of the reporting forms, or any further information, please contact Tom Atkinson or my staff at (404) 363-7028.

Sincerely,



Tim Smith

Fuels Unit Manager

Mobile and Area Sources Program

cc: Industry Associations, Gasoline Transport

FILE: Gasoline Transport Vehicle Reporting May 2004 Memo

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Mobile and Area Sources Program – Fuels Unit

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## Georgia 45-County Fuel Control Area Q & A

**Q: I am a retail station owner, what are the rules for my gasoline station?**

A: Effective April 1, 2003, the Gasoline Marketing rule, Chapter 391-3-1-.02(2)(bbb), of the Rules for Air Quality Control, states that a retail station in the 45-county fuel control area must sell/supply gasoline that meets the specifications required by the rule.<sup>1</sup>

**Q: What are those requirements?**

A: *First*, effective April 1, 2003, the Gasoline Marketing rule (bbb) applies to 45 counties in Georgia: Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Hall, Haralson, Henry, Jackson, Newton, Paulding, Pickens, Rockdale, Spalding, Walton, **Banks, Chattooga, Clarke, Floyd, Gordon, Heard, Jasper, Jones, Lamar, Lumpkin, Madison, Meriwether, Monroe, Morgan, Oconee, Pike, Polk, Putnam, Troup, and Upson.**<sup>2</sup>

*Second*, gasoline shipped/sold at retail within those 45 counties must meet both Reid vapor pressure (RVP) and sulfur limits as stated in the Gasoline Marketing rule (bbb).

**Q: What are the RVP limits for retail stations?**

A: RVP is a seasonal control. From June 1<sup>st</sup> – Sept. 15<sup>th</sup>, the RVP must be 7.0 psi or less. However, you will need time to turnover your standard winter gasoline and have the low RVP/low sulfur gasoline in place at retail no later than June 1<sup>st</sup>. Sample testing by the Georgia Department of Agriculture will begin on June 1<sup>st</sup>. Stations with low monthly throughput volumes and premium tanks need earlier deliveries of compliant gas to ensure compliance.

**Q: What are the sulfur limits for retail stations?**

A: Effective January 1, 2004, the sulfur cap will be 150 ppm (by weight). Effective June 1<sup>st</sup> – Sept. 15<sup>th</sup>, 2004, the seasonal sulfur per gallon cap will be 80 ppm (by weight). Unlike RVP, sulfur is being tested at retail stations by the Department of Agriculture year-round since June 1, 2003.

**Q: What happens if I don't have the low RVP/low sulfur gasoline in place by June 1?**

A: Once the test results are returned to the Environmental Protection Division by the Georgia Department of Agriculture, a Notice of Violation (NOV) is issued to the owner of the retail location requiring documentation to the Division. You will have no more than 30 days to return the required documentation. After the department reviews all documents, you will be issued a Final Disposition – either a Warning Letter or a Consent Order. A Consent Order includes administrative action or settlement. Additionally, you must provide proof that all facilities subject to the Gasoline Marketing rule have been notified and that an implementation plan exists that prevents future violations.

**Q: How will I know if the correct gasoline is being shipped to my retail store?**

A: Request the required gasoline and make sure your jobber is bringing in the correct fuel specifications. One way to ensure that you are getting the correct fuel is to check the Bill of Lading. Each Bill of Lading is required to be labeled properly. Please note that EPA-CONV is **no longer acceptable** in the 45-county fuel control area after 5/31/03.

<sup>1</sup> See the Official Gasoline Marketing rule (bbb) under General Requirements

<sup>2</sup> Counties listed in **Bold** were added to the fuel-control area effective April 1, 2003

## RETAIL-LEVEL EXPECTATIONS

Control Periods	Labels <sup>1</sup> Anticipated on Bills of Lading	Delivered Fuel Specifications
04/01/03 – 05/31/03	EPA-CONV <sup>2</sup> GA-LS-Q GA-LS-Q/RVP	<b>Transition Period</b> - fuel specs vary dependent on origin date at the refinery: RVP – Applicable EPA specs → 7.0 psi Sulfur – Applicable EPA specs → 90 ppm pool avg. Sulfur – Per gallon cap 200 ppm <b>Seasonal Control Period</b> - seasonal fuel specs are: RVP – 7.0 psi Sulfur – Quarterly 90 ppm pool avg. Sulfur – Per gallon cap 200 ppm
06/01/03 – 09/15/03	GA-LS-Q/RVP	<b>Transition Period</b> - fuel specs vary dependent on origin date at the refinery: RVP – Applicable EPA specs Sulfur – Quarterly 90 ppm pool avg. → Annual 30 ppm pool avg. Sulfur – Per gallon cap 200 ppm → 150 ppm <b>Annual Control Period</b> - fuel specs vary from <u>annual</u> “shipping date” control to <u>seasonal</u> “consumption date” control: RVP – Applicable EPA specs → 7.0 psi Sulfur – Annual 30 ppm pool avg. Sulfur – Per gallon cap 150 ppm → 80 ppm <b>Seasonal Control Period</b> - seasonal fuel specs are: RVP – 7.0 psi Sulfur – Annual 30 ppm avg. Sulfur – Per gallon cap 80 ppm
09/16/03 – 12/31/03	GA-LS-Q <sup>2</sup> GA-LS-A	<b>Transition Period</b> - fuel specs vary dependent on origin date at the refinery: RVP – Applicable EPA specs Sulfur – Quarterly 90 ppm pool avg. → Annual 30 ppm pool avg. Sulfur – Per gallon cap 200 ppm → 150 ppm <b>Annual Control Period</b> - fuel specs vary from <u>annual</u> “shipping date” control to <u>seasonal</u> “consumption date” control: RVP – Applicable EPA specs → 7.0 psi Sulfur – Annual 30 ppm pool avg. Sulfur – Per gallon cap 150 ppm → 80 ppm <b>Seasonal Control Period</b> - seasonal fuel specs are: RVP – 7.0 psi Sulfur – Annual 30 ppm avg. Sulfur – Per gallon cap 80 ppm
01/01/04 – 05/31/04	GA-LS-A GA-LS-A/RVP	<b>Transition Period</b> - fuel specs vary dependent on origin date at the refinery: RVP – Applicable EPA specs Sulfur – Quarterly 90 ppm pool avg. → Annual 30 ppm pool avg. Sulfur – Per gallon cap 200 ppm → 150 ppm <b>Annual Control Period</b> - fuel specs vary from <u>annual</u> “shipping date” control to <u>seasonal</u> “consumption date” control: RVP – Applicable EPA specs → 7.0 psi Sulfur – Annual 30 ppm pool avg. Sulfur – Per gallon cap 150 ppm → 80 ppm <b>Seasonal Control Period</b> - seasonal fuel specs are: RVP – 7.0 psi Sulfur – Annual 30 ppm avg. Sulfur – Per gallon cap 80 ppm
06/01/04 – 09/15/04	GA-LS-A/RVP	<b>Transition Period</b> - fuel specs vary dependent on origin date at the refinery: RVP – Applicable EPA specs Sulfur – Quarterly 90 ppm pool avg. → Annual 30 ppm pool avg. Sulfur – Per gallon cap 200 ppm → 150 ppm <b>Annual Control Period</b> - fuel specs vary from <u>annual</u> “shipping date” control to <u>seasonal</u> “consumption date” control: RVP – Applicable EPA specs → 7.0 psi Sulfur – Annual 30 ppm pool avg. Sulfur – Per gallon cap 150 ppm → 80 ppm <b>Seasonal Control Period</b> - seasonal fuel specs are: RVP – 7.0 psi Sulfur – Annual 30 ppm avg. Sulfur – Per gallon cap 80 ppm
09/16/04 – 12/31/04	GA-LS-A	<b>Transition Period</b> - fuel specs vary dependent on origin date at the refinery: RVP – Applicable EPA specs Sulfur – Quarterly 90 ppm pool avg. → Annual 30 ppm pool avg. Sulfur – Per gallon cap 200 ppm → 150 ppm <b>Annual Control Period</b> - fuel specs vary from <u>annual</u> “shipping date” control to <u>seasonal</u> “consumption date” control: RVP – Applicable EPA specs → 7.0 psi Sulfur – Annual 30 ppm pool avg. Sulfur – Per gallon cap 150 ppm → 80 ppm <b>Seasonal Control Period</b> - seasonal fuel specs are: RVP – 7.0 psi Sulfur – Annual 30 ppm avg. Sulfur – Per gallon cap 80 ppm

<sup>1</sup>See Product Labeling, page 2 of May 5, 2003, Gasoline Marketing Rule Guidance documents

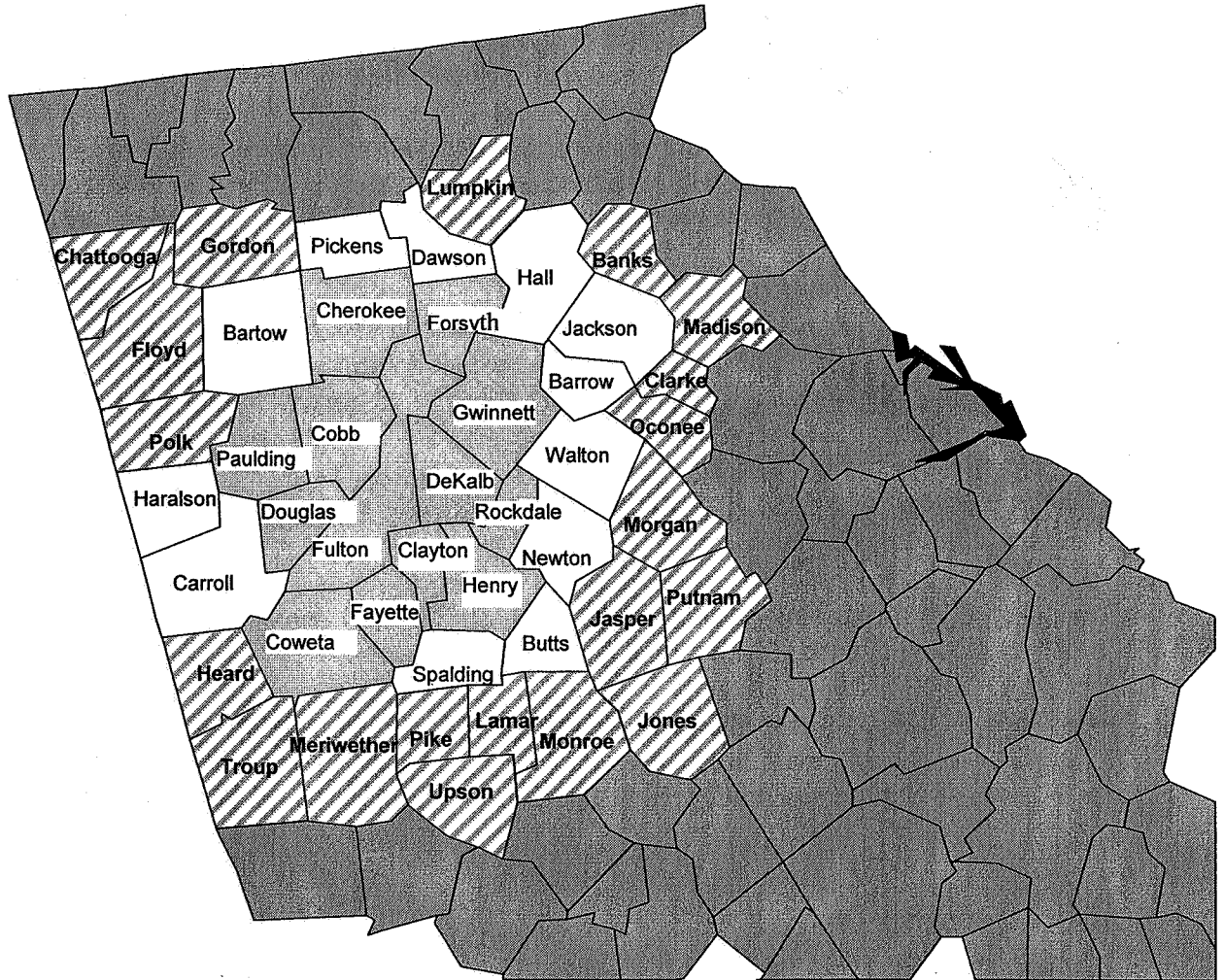
<sup>2</sup>Existing supply shipped from refinery prior to control period. EPA-CONV, is NOT ACCEPTABLE in the 45-county fuel control area

## PRODUCT LABELING

The 45-county area will see a variety of products over the 2003 calendar year, and a limited number from 2004 forward, each of which will require specific documentation and labeling under the Gasoline Marketing rule. For the benefit of both terminal operators and their customers, the Division has developed the following generic product description labels for use in properly completing each required shipping manifest or Bill of Lading for use from the loading rack to the retailer. Each Bill of Lading must properly document the nature of the gasoline as follows (Note – use only the product description label, for example: GA-LS-A/RVP):

- EPA-CONV means this gasoline was **not** produced to meet the low sulfur or low RVP fuel specifications for the 45-county Atlanta fuel control area after May 31, 2003. EPA-CONV is **NO LONGER ACCEPTABLE** in the 45-county fuel control area, and will incur full enforcement penalties.
- GA-LS-Q and GA-LS-Q/RVP are **NO LONGER UTILIZED** in the 45-county fuel control area.
- GA-LS-A means this gasoline meets only the 30 ppm annual low sulfur average fuel specifications for the 45-county Atlanta fuel control area.
- GA-LS-A/RVP means this gasoline meets the 30 ppm annual low sulfur average, as well as the seasonal 80 ppm low sulfur and 7.0 psi low RVP per gallon cap fuel specifications for the 45-county Atlanta fuel control area.

# 45-COUNTY ATLANTA FUEL-CONTROL AREA



Represents the **13-county Nonattainment area** and part of the 25-county fuel-control area



Represents the additional 12 counties to the 25-county in the fuel-control area from **1999-2002**



Represents the 20 additional counties in the fuel-control area as of **April 1, 2003**



Not Applicable