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Subject:	Gasoline Dispensing Area Rule Subpart 6 Cs - Poppet Valves
Date:	Wednesday, September 08, 2010 9:07:43 AM

I have received phone calls regarding the gasoline dispensing area source regulations (Subpart 6 Cs). The consultants and regulated community in Region 7 have been getting a conflicting interpretation of the regulations. The issue involves coaxial systems and the type of connection that is required on the end of the system when it is disconnected from the storage tank. The two options are 1) a "poppet valve" (or equivalent device which seals upon disconnect), and 2) a cap which fits on the end of the coaxial system. As a result, I obtained an interpretation from both OAQPS and OECA so that we are implementing the regulations consistently on a national basis. EPA Headquarter's response was that a "poppet valve" (or equivalent device which seals upon disconnect) is required by the regulations. A cap placed on the end of the coaxial system would not meet the requirements.

The poppet valve is spring loaded so that when it is disconnected from the tank, it immediately closes and prevents gasoline vapors from escaping at the end of the coaxial system. Alternatively, a cap placed on the end will prevent vapors from escaping but there is a very brief period of time that elapses once the coaxial system is disconnected from the tank and when the cap can be installed. During this brief time period, vapors escape from the end of the system into the atmosphere because the pressure in the tank is usually a little above atmospheric pressure.

In Table-1 of Subpart CCCCCC, under letters (a) and (b), it states:

a) All vapor connections and lines on the storage tank shall be equipped with closures that seal upon disconnect.

b) The vapor line from the gasoline storage tank to the gasoline cargo tank shall be vapor-tight, as defined in § 63.11132.

Therefore, a poppet valve (or equivalent device which seals upon disconnect) is required the regulations. A a cap placed on the end of the coaxial system would not meet the regulatory requirements. It is my understanding that this issue only arises with coaxial system as opposed to tanks equipped with dual point systems.

If you have any question or would like to discuss this, please give me a call.

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