Important Note: The following text is excerpted directly from the New York State Department of Environmental Conservation's publication, *Environmental Compliance, Pollution Prevention, and Self Assessment Guide for the Marina Industry.* New York State Department of Environmental Conservation Pollution Prevention Unit. March 2003. The only changes that have been made are the addition of links to pertinent resources or regulations and Editor's Notes, where appropriate.

## **Air Regulations**

## PART 230 - GAS DISPENSING FACILITIES

Air emissions from refueling operations are addressed in 6 NYCRR Part 230,

http://www.dec.state.ny.us/website/regs/part 230.html#top and EPA's AP-42 Section 5.2.2.2 emission factors for service stations, click here.

http://www.epa.gov/ttn/chief/ap42/ch05/final /c05s02.pdf. The factors in Table 5.2-7 [Eds Note: Table 5.2-7 was not included in the DEC's original document, so it could not be reproduced here. However, it can be found in file associated the link above for EPA's AP-42 Section 5.2.2.2. ] can be used to calculate emissions from the filling of the marina's tank as well as the emissions from boat refueling. A storage tank without a drop tube would use the 11.5 lb/1000 gallon throughput factor shown for "Splash filling". A storage tank with a drop tube would use the lower 7.3 lb/1000 gallon throughput factor shown for "Submerged filling". If a station had a Stage I connection on the tank, which allows the vapors to return to the tank truck during delivery rather than blowing out the vents, the 0.3 lb/1000 gallon throughput factor would be appropriate. Since Stage II is a vehicle refueling control strategy that is not used for marinas, the "uncontrolled displacement losses" factor of 11.0 lb/1000 gallons throughput would be the refueling factor. We could also add in the 1.0 lb/1000 gallons throughput "breathing and emptying factor" and the .7 lb/1000 gallon throughput "spillage" factor. We would end up with a

total emission factor of 7.3 + 11.0 + 1.0 + 0. 7 = 20.0 pounds of VOC emitted for each multiple of 1000 gallons of gasoline pumped at a typical marina. The larger facilities may find that their gasoline refueling emissions are significant in comparison to their painting operations.

## Does My Marina Need A Part 230 Permit?

Part 230 does not apply as long as no vehicles are refueled from the marina gasoline pumps. This means that the drop tube would not be required in the storage tank under the air regulation, but most new tanks would be equipped with them as a pollution prevention and fuel conservation measure. In addition, neither Stage I or II would be required if no vehicles are refueled at the facility.