

Ohio EPA

Division of Air Pollution Control

Engineering Guide #35

**Question:**

Should external and internal floating roofs be considered as control equipment for the purpose of calculating emissions to determine whether or not a storage tank for petroleum liquids is eligible for registration status under the provisions of paragraph (B)(2) of OAC rule 3745-31-08?

(This question was submitted by William Garber of the Toledo Environmental Services Agency on September 16, 1981.)

**Answer:**

Since an external floating roof is always installed as an essential part of the tank itself and always includes some type of primary seal, such roof and its associated primary seal should not be considered as control equipment. However, secondary seals should be considered as control equipment because they are added for the purpose of further controlling or reducing emissions of organic compounds.

Internal floating roofs within fixed roof storage tanks should be considered as control equipment since they are installed to reduce emissions of organic compounds and are not an essential part of the tank. Many internal floating roofs have been installed in fixed roof tanks pursuant to the requirements of the Ohio EPA for the control of organic compound emissions.

It is recommended that external floating roof tanks that are not exempt from the requirements of OAC rules 3745-21-09(Z) and 3745-21-21 continue to be issued operating permits (provided the tank is in compliance with all applicable air pollution control requirements) regardless of their maximum potential yearly emissions. The primary purpose of maintaining these tanks in active permit status is to ensure periodic checks by the field office personnel concerning compliance with the requirements of OAC rules 3745-21-09(Z) and 3745-21-21. The external floating roof tanks that are exempt from OAC rules 3745-21-09(Z) and 3745-21-21 and that may remain on registration status, if registration status is applicable and appropriate, are identified in OAC rules 3745-21-09(Z)(3) and 3745-21-21(D)(2).

JL/JB

(Issued March 29, 1982; revised and updated December 11, 2009)