Training on VOC Installations (Chapter V (VOC) of IED (Directive 2010/75/EC), Petrol Stage I/II Directives):

Petrol Stage I Directive – Best Techniques

German Country Experience

Directive 1994/63/EC storage of petrol and its distribution from terminals to service stations

EUROPEAN PARLIAMENT AND COUNCIL DIRECTIVE 94/63/EC

of 20 December 1994

on the control of volatile organic compound (VOC) emissions resulting from the storage of petrol and its distribution from terminals to service stations

(OJ L 365, 31.12.1994, p. 24)

Last amended by Regulation (EC) No 1137/2008 of 21.11.2008

Best Techniques and Practices – Europe and especially Germany

► B

Scope of Petrol Stage I: Storage – Distribution of Petrol

"Old" Directive



Part of EU REFIT Programme

- 2015: Start of the evaluation of the effectiveness, efficiency, coherence, relevance and the EU added value
- Several meetings
- Final Report: 2017
- Results under

https://circabc.europa.eu/faces/jsp/extension/wai/navigation/container.jsp?FormPrincipal:_idcl=FormPrincipal I:_id1&FormPrincipal_SUBMIT=1&id=a74500a7-7335-45d3-8867-

78c625e315be&javax.faces.ViewState=BbQJ0%2FmbYPIw5ATd%2Fv5XDYpmXG8NJ2XTXru3pW7UbQc9 yua4umqOWGWEHojpEgMoLHxR4zpzIu4OBu2duk31ul8xpUjUFO2QE0FWNRfDZbSnuB8okOqJnf0500oyj X3zbdf5r7K8yOD6OOsUXIZJS%2BRj1Q4%3D

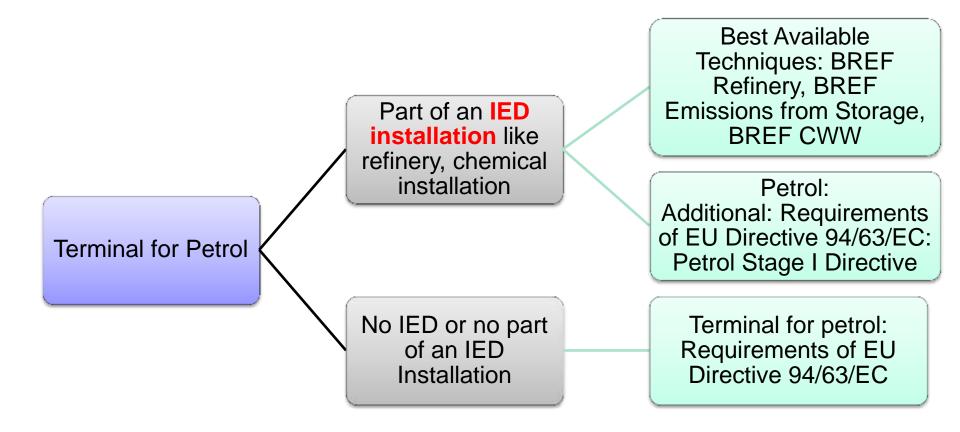
Best Practice for Terminals: Implementation of an environmental permitting duty

EU:

If a terminal is a part of an IED installation (generally refinery):

- -> IED permitting procedure and permit required
- -> Application of BATs
- -> IED Inspection procedures required

EU legal requirements for Petrol Terminals for Air Pollution Control



Germany: Environmental permit requirements for tank farms for the storage of fuels or inflammable substances – here Petrol

- Annex of German 4th BImSchV No 9.2 is the relevant number for the storage of fuels or other inflammable substances.
- Relevant is the maximum possible installed capacity of the site (one operator).

9.2	Installations for the storage of liquids, except for installations that		
	are covered by paragraph 9.3,		
9.2.1	with a capacity of 10 000 tonnes or more, provided that the liquids have	C	
	a flash point of 373.15 Kelvin or less,	G	
9.2.2	5 000 tonnes to less than 10 000 tonnes, provided that the liquids have		
	a flash point below 294.15 Kelvin and their boiling point at atmospheric	V	
	pressure(101.3 kilopascals)over 293.15 Kelvin;		

Germany: Environmental permit requirements for tank farms for the storage of fuels or inflammable substances – here Petrol

Result:

If an installation requires an environmental permit

- Assessment of hazardous impacts has to be carried out
- Emission limit values for benzene will be set for VRUs additionally to TOC
- Best Available Techniques have to be applied this is generally more stricter than Petrol Stage I – Petrol Stage I sets only minimum requirements!
- Other requirements from TA Luft like use of a flare for tank cleaning, prevention of landing of floating roofs and technical requirements for pumps, valves etc. have to be complied, too

"Petrol" referring to Petrol Stage I:

any petroleum derivative, with or without additives, having a reid vapour

pressure of 27,6 kilopascals or more, which is intended for use as a fuel for

motor vehicles, except liquefied petroleum gas (LPG)

"Petrol" in German 20th BlmSchV: -> Reference to international Transport Regulations made in Definition -> +: use of same terminology petroleum derivatives with a share of up to 10 percent by volume of bioethanol, corresponding to UN Number 1203 of the respective Table A in Part 3 Chapter 3.2.1 of Annexes A and B to the ADR, in Part 3 Chapter 3.2 of the RID or in Part 3 Chapter 3.2.1 of the Annex to the ADN and which are intended for use as fuel for

petrol engines

ADR: International Carriage of Dangerous Goods by Road: https://www.unece.org/fileadmin/DAM/trans/danger/publi/adr/adr2015/ADR2015e_WEB.pdf RID = International Carriage of Dangerous Goods by Rail http://otif.org/en/?page_id=174

ADN: International Carriage of Dangerous Goods by Inland Waterways https://www.unece.org/trans/danger/publi/adn/adn2015/15files_e.html

Tank colour for over ground tanks

BAT is to paint the external walls and roofs in a colour with a total radiant reflectance as high as possible (minimum: 70 %)

White – total radiant heat reflectance of 84 %

Colour	Coating factor [1]	Total radiant heat reflectance
white aluminium silver	1,0 1,1	84 % 72 %
light grey mouse grey	1,3 1,6	51 % 13 %

• BREF EFS 5.1.1.1

- EU Petrol Stage I Annex I
- TA Luft 2002 No 5.2.6.7

But: Note "wording" of requirements e.g. Petrol Stage I Annex I and German Ordinance:

- The external wall and roof of tanks above ground must be painted in a colour with a total radiant heat reflectance of 70 % or more.
- These operations may be programmed so as to be carried out as part of the usual maintenance cycles of the tanks within a period of three years. Member States may grant a derogation from this provision where required for the protection of special landscape areas which have been designated by national authority.
- This provision shall not apply to tanks linked to a vapour recovery unit which conforms with the requirements set out in Annex II, point 2.
 20th BlmSchV: The operator shall construct and operate above-ground storage tanks in such a way that the outer wall and the roof are painted in a colour with a total radiant heat reflectance of at least 70 per cent.

Result:

- In Germany every tank must have the heat radiance efficiency permanently
- All tanks independent if connected to a VRU must have the heat radiance efficiency to prevent VOC emissions!
- No derogations -> easier for the enforcement for authorities

German country experience - Petrol Stage Ia

Further measures to prevent the increase of storage temperature and breathing emissions are for example

- improvement of wall isolation,
- application of sun shields in the area of sun exposed tank walls,
- natural cooling of floating roof by evaporation of rain water

Reference BREF ESB

Tanks with external floating roofs:

BREF EFS 5.1.1.2

BAT is to reduce the emissions of a floating-roof tank to 97% and more of the

emissions of a fixed-roof tank without further measures.

Total efficiencies of the floating roof tank of approx. **99,5%** achievable by:

- A threefold sealing system
- together with a complete guide pole cover and seal
- and with roof leg seals

BREF Ref BAT 49:

BAT is to use **floating roof storage tanks** equipped with high efficiency seals **or** a **fixed roof tank connected to a vapour recovery system**.

BREF EFS 5.1.1.2: A **dome** can be **BAT** for adverse weather conditions, such as high winds, rain or snowfall.

Example: German 20th BImSchV – external floating roof tanks

- Tanks with external floating roofs must be equipped with_annular gap sealings according to the Best Available Techniques.
- The seals should be designed to achieve an overall containment of vapours of 97 % or more as compared to a comparable inoperative fixed-roof tank with no vapour containment controls (that is a fixed-roof tank with only vacuum/pressure relief valve and no turnovers)

Note:

A emission reduction ratio of less than 97 % can be permitted for tanks with a diameter less of 40 m by the competent authority.

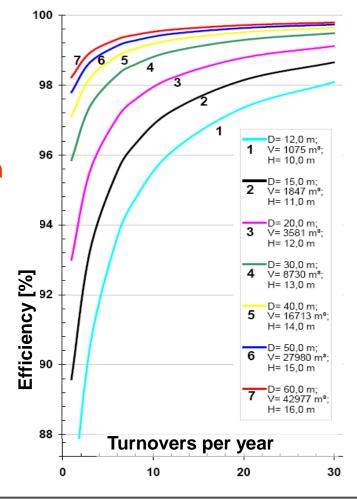


Influence of the number of turn-overs on the calculated efficiency of the seal

More turnovers increase calculated efficiency!

-> To compare technical quality of seals the emission reduction efficiency must be referred to an inoperative comparable fixed-roof tank with no vapour containment controls (that is a fixed-roof tank with only vacuum/pressure relief valve and no turnovers).

Storage of petrol 600 mbar (Reid), average wind speed 3 m/s, daily average temperature 10 °C, all floating roof tanks with the same sealings (rim, pole guide, roof legs)



German 20th BImSchV – Fixed roof tanks

- Fixed-roof tanks must have an internal floating roof equipped with annular gap sealings according to Best Available Techniques
- Overall containment of vapours of ≥ 97 % in relation to a comparable inoperative fixed-roof tank with no vapour controls and no turnovers.

German country experience - Petrol Stage la

For demonstration of emission reduction efficiencies for

- a) external floating roof tanks
- b) fixed roof tanks

calculation of emissions should be applied.

On hand of emission calculation the application of BAT can be shown by the operator

-> See IE Directive Art. 14 1 d) – annual information by operator to demonstrate

compliance to competent authority

Calculation techniques:

- a) US API Standards
- b) VDI 3479

German country experience - Petrol Stage Ia

BREF EFS (Chapter 5.1.1.1.): Monitoring of VOC from Storage

On sites where significant VOC emissions are to be expected,

BAT includes calculating the VOC emissions regularly.

The calculation model may occasionally need to be validated by applying a measurement method.

Split view from 3 Member States, because in their view, on sites where significant VOC emissions are to be expected (e.g. refineries, petrochemical plants and oil terminals), BAT is to calculate the VOC emissions regularly with validated calculation methods, and because of uncertainties in the calculation methods, emissions from the plants should be monitored occasionally in order to quantify the emissions and to give basic data for refining calculation methods. This can be carried out by using DIAL techniques. The necessity and frequency of emission monitoring needs to be decided on a case-by-case basis.

Comparision of reduction efficiencies Imhof Tanktechnik

The expected efficiencies are e.g.:

	External Floating Roof Tank	Internal Floating Roof Tank
Primary seal	eff. ~ 88 %	eff. ~ 95 %
Double seal	eff. ~ 93 %	eff. ~ 98 %
Double seal + guide pole sea	eff. ~ 97,5 %	eff. ~ 99 %
Triple seal + guide pole cove	r eff. ~ 99,5 %	eff. ~ 99,8 %

Fixed roof tanks: Prevention of VOC losses by breathing

BAT is to prevent VOC losses by using pressure and vacuum relief valves.

The goal of the application of Vacuum/Pressure Relief Valves (V/P valves) is the reduction of breathing losses during the storage of VOC

Setting of the valves to an overpressure of **+ 0,02 bar and a vacuum of 0,01 bar** (see No 3.3.2.1 of VDI 2440):

valve response pressure: ca. + 0,014/-0,007 bar

-> Until the response pressure the V/P valves are kept close although the tank vapour space volume achieve changes by warming/cooling or air pressure fluctuations.

Summary:

- 1. Set requirements on the seal efficiency for new storage tanks according to BAT for new ones: BAT is currently ≥ 97 %
- 2. Require qualified assessments on the sealing efficiencies by independent experts/expert bodies

Assessment of efficiency of seals – possible procedure:

Verification by calculation with appropriate programme by a specified

company or expert body:

a) new installations: before putting into operation to be submitted to

authority giving license

b) existing installations: three month before deadline for retrofitting ends

to be submitted to authority giving license

Petrol Stage I – Best Practice on Article 4 with Annex II – Loading and unloading of mobile containers

Displacement vapours from the mobile container being loaded must be returned through a vapour-tight connection line to a vapour recovery unit for regeneration at the terminal.

. . ..

Where top-loading of mobile containers is permissible:

the outlet of the loading arm must be kept near the bottom of the mobile container, in order to avoid splash loading

Here: Top-loading of railway wagons

Petrol Stage I – Best Practice on Article 4 with Annex II – Loading and unloading of mobile containers

German 20th BlmSchV – Transfer and handling liquids

Gas (vapour) balancing according to BAT is permitted for:

- Loading of fixed roof storage tanks at terminals
- Loading of mobile containers (vessels, road tankers, railway tank waggons)

if same emission reduction is achieved as by the use of a vapour recovery unit!

Vapour balance systems comply to the Best Available Techniques if

especially

- the petrol flow is unblocked only if the vapour recovery system is connected and
- the vapour recovery system together with connected devices don't release vapours into the atmosphere during operation of vapour recovery (besides emissions caused by reasons of safety)

Petrol Stage I – Best Practice on Article 4 with Annex II – Loading and unloading of mobile containers

German 20th BImSchV – Transfer and handling liquids

Verification of tightness of the gas balance system by an authorized institute:

Total system check including functioning and tightness

First time before putting system into operation and than every 5 years

-> report of expert body has to be submitted to competent authority by operator

Basis for the verification and regularly inspection:

VDI 2291 (June 2016): Emission control: Test criteria for monitoring vapour recovery systems

IC5 13.040.40	VDI-RICHTLINIEN	Juni 2016 June 2016
VEREIN DEUTSCHER INGENIEURE	Emissionsminderung Prüfkriterien für die Überwachung von Gaspendelsystemen	VDI 2291
	Emission control Test criteria for monitoring vapour recovery systems	Ausg. deutsch/englisch Issue German/English

German 20th BImSchV – Transfer and handling liquids

The inspection includes the vapour balancing system from vapour balance coupling at gantry via corresponding lines up to an existing vapour storage tank as well as components of inter-locking device, as far as existing. The check includes following control steps:

- Visual check of connectors and components of vapour recovery as well as interlocking device especially according to correct installation and damages
- Check of compliance of incidental provisions of permits, licences etc.
- As part of inspection before taking into operation check of tightness of lines with an overpressure of 1 bar
- As part of periodical inspections tightness checks of detachably joining lines
- · Check on system according to specification of manufacturer

Petrol Stage I – Best Practice on Article 4 – Loading and unloading of mobile containers

Summary:

- **1.** Implement the possibility for gas balancing at terminals
- 2. Implement an electronic interlock that allows loading/unloading only if the vapour recovery line is connected
- 3. Implement an inspection of the vapour balancing system by an independent expert/expert body use VDI 2290 as a base

Petrol Stage I – Best Practice on Article 4 with Annex II – Vapour Recovery Unit (VRU)

Transfer and handling of liquids – Vapour Recovery Units VRU

BREF REF No 52 / BATC 10/2014 BAT 52:

BAT is in order to prevent or reduce VOC emissions to air from loading and unloading operations,

to use one or a combination of techniques

to reach a **recovery rate of at least 95 %.**

German country experience - Petrol Stage la

Petrol Stage I – Best Practice on Article 4 with Annex II – Vapour Recovery Unit (VRU) BREF Ref – see Table 4.104

Plant type	Recovery (¹) rates (%)	Average values attainable in continuous operation ⁽²⁾ ⁽³⁾	
		NMVOC(⁴)(g/Nm ³)	Benzene (mg/Nm⁵)
Single-stage condensation plant	80 - 95	50	1
Single-stage absorption plant	90 – 97	35	50
Single-stage adsorption and membrane separation plants	90 - 99.5	<10 (5)	1
Single-stage adsorption plants with supplementary blower	99.98	0.15	1
Compression, absorption and membrane separation (⁶)	90 — 95	NA	NA
Two-stage plants	99.98	0.15	1

⁽¹⁾ As an indicator of performance level.

²) Expressed as an hourly average in continuous operation for consistency with 94/63/EC (Annex II).

(³) These values are given for a HC concentration in the uncleaned gas of approx. 1 000 g/Nm³.

(⁴) NMVOC: Non-methane volatile organic compounds. The methane contents in the vapours of the substances to be loaded can vary considerably. Absorption and adsorption processes cannot notably reduce methane emissions.

(⁵) If single-stage plants are used as a preliminary stage for gas engines, a concentration of approx. 60 g/m³ is necessary for operation of the gas engine.

(⁶) Compression followed by a two-stage recovery section: reabsorption of the VOCs into a fraction of the condensate being loaded followed by a membrane separation stage.

Source: Updated TWG 2010 ([36, CONCAWE 4/09 2009]), TWG- NO

BREF Ref – see BAT No 52

Technique	Description	Applicability (¹)		
Vapour recovery by: i. Condensation ii. Absorption iii. Adsorption iv. Membrane separation v. Hybrid systems	See Section 5.20.6	Generally applicable to loading/unloading operations where annual throughput is >5 000 m ³ /yr. Not applicable to loading/unloading operations for sea-going vessels with an annual throughput <1 million m ³ /yr		
(1) A vapour destruction unit (e.g. by incineration) may be substituted for a vapour recovery unit, if vapour				
recovery is unsafe or technically impossible because of the volume of return vapour.				

Table 5.16: BAT-associated emission levels for non-methane VOC and benzene emissions to air from loading and unloading operations of volatile liquid hydrocarbon compounds

Parameter	BAT-AEL (hourly average) (¹)			
NMVOC	$0.15 - 10 \text{ g/Nm}^3 (^2) (^3)$			
Benzene (³) <1 mg/Nm ³				
(¹) Hourly values in continuous operation expressed and measured according to European Parliament and Council Directive 94/63/EC (OJ L 365, 31.12.1994, p. 24).				
(²) Lower value achievable with two-stage hybrid systems. Upper value achievable with single-stage adsorption or membrane system.				
(3) Benzene monitoring may not be necessary where emissions of NMVOC are at the lower end of the range.				

German 20th BlmSchV – Emission limit values VRU

- 1. Installations not requiring an environmental permit:
- Waste gas abatement unit with an emission reduction efficiency ≥ 97 % and emission mass concentration of organic substances without methane, expressed as total carbon,

 \leq 1.7 g C/m³ if mass flow of installation \geq 0.50 kg C/h (without methane).

- 2. Installations requiring an environmental permit:
- a) if mass flow organic substances without methane ≥ 0.50 kg C/h: emission limit mass concentration for organic substances without methane: 50 mg C/m³
- b) if mass flow organic substances without methane < 0.50 kg C/h: emission limit mass concentration for organic substances without methane:
 1.7 g C/m³

<u>German 20th BlmSchV – Emission limit values VRU</u>

Constructions	Degree of Purification at least:	Max. emission mass concentration of organic matter without Methane
For storage < 5.000 t	97%	12 g C/m _N ³ (hourly average)
For storage \geq 5.000 t		
With emission mass flow < 0,50 kg organic matter/h:	-	1.7 g C/m _N ³
With emission mass flow > 0,50 kg organic matter/h:	-	50 <u>mg</u> C/m _N ³

Petrol Stage I – Best Practice on Article 4 with Annex II – Vapour Recovery Unit (VRU)

Goal of the Vapour Recovery:

Liquefaction of hydrocarbons from vapour phase

2 Processes take place:

- a) Separation of the hydrocarbons from air
- b) Liquefaction of the separated hydrocarbon vapours

German country experience - Petrol Stage Ia

Petrol Stage I – Best Practice on Article 4 with Annex II – Vapour Recovery Unit (VRU)

Examples of separation processes:

- Pressure swing adsorption on activated carbon
- Absorption by washing in a low volatility absorbent fluid
- Selective membrane separation
- Condensation by cooling or compression (separation and liquefaction are combined in a single process)

Examples of liquefaction processes:

- Absorption, normally into their own product
- Condensation
- Compression.

Petrol Stage I – Best Practice on Article 4 with Annex II – Vapour Recovery Unit (VRU)

Applied VRU systems:

- Absorption in a cold lean oil stream
- Adsorption in twin bed pressure swing operation
- Indirect liquid condensation in a refrigerant heat exchanger
- Membrane separation by passage through a hydrocarbon selective surface

Petrol Stage I – Best Practice on Article 4 – Vapour Recovery Unit (VRU)

Liquefaction of hydrocarbons from vapour phase

a) Condensation

Cooling in a heat exchanger

Problem:

Air humidity leads to a freezing of heat exchanger -> design in 2 stages and/or alternating operation

b) Absorption

Washing out of vapours in counter-flow

BAT is

to use a dry vacuum compressor instead of a liquid ring vacuum pump!

Example:

DryVAC[™] VRS by Symex Americas

http://www.symextech.com/technical-papers/ http://www.buschusa.com/products/product-portfolio/cobra/downloads/

Examples of manufacturers of VRUs

John Zink

https://www.johnzink.com/wp-content/uploads/carbon-adsorption-vapor.pdf

Borsig Membrane VRU

http://mt.borsig.de/en/products/membrane-units-for-emission-control/borsig-vapourrecovery-unit.html

http://mt.borsig.de/en/products/membrane-units-for-emission-control/borsig-carbon-retrofit-unit.html

ZEECO VRU

http://www.zeeco.com/vapor/vapor-recovery.php

<u>Symex</u> <u>http://www.symextech.com/wp-</u> <u>content/uploads/2015/03/DRYVacUS_Presentation1.pdf</u> <u>https://www.youtube.com/watch?v=wvYqAPMUjUc</u>

Aereon

http://www.aereon.com/gas-vapor-recovery-systems

Carbovac http://www.carbovac.com/

Summary: Recommendations

- ELV for Benzene should be set ("1 mg/Nm³_{dry}") additionally for VRU emissions
- 2. For emission monitoring:

The use of a flame ionisation detector should be applied for the determination of Total Organic Carbon. The method should be DIN EN 12619

Requirements for sampling should be referred on DIN EN 15259

3. Stack height: Minimum requirements according to VDI 2280

Petrol Stage I – Best Practice on Annex IV – Bottom Loading of Road Tankers at Terminals

Loading of road tankers BAT is

to apply **bottom loading** for road tankers



BREF Refineries No 4.21.17

- The loading/unloading pipe is flange-connected to a nozzle situated at the lowest point of the tank.
- A vent pipe on the tank can be connected to a gas balancing line, VRU
- The flange connection in the filling line has a special design ('dry connection') which enables it to be disconnected with minimum spillage/emissions.

Petrol Stage I – Best Practice on Annex IV – Bottom Loading of Road Tankers at Terminals

Requirements in Annex IV FOR BOTTOM-LOADING, VAPOUR COLLECTION AND OVERFILL PROTECTION OF EUROPEAN ROAD TANKERS

Couplings for liquid throughput and vapour recovery have to comply to certain API norms

Equipment for couplings, connection of vehicle earth/overfill detection and safety

interlocks are nowadays standard

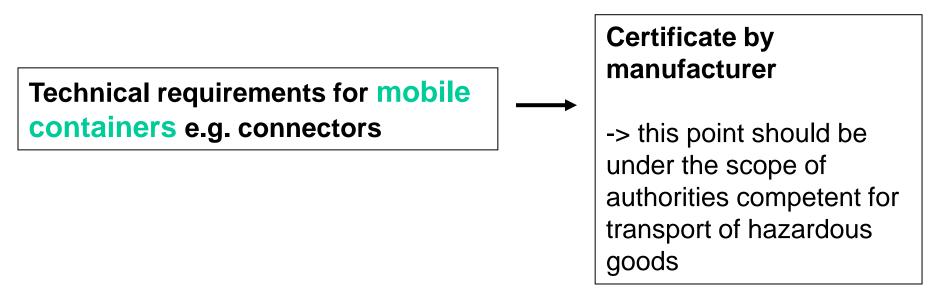
-> many suppliers available

Example for API Dry Coupling: <u>EMCO Wheaton</u> http://www.emcowheaton.com/api-couplings/

Example of the equipment of a road tanker with bottom loading:

FMC Technologies http://www.fmctechnologies.com/en/MeasurementSolutions/Technologies/LiquidProducts/Tru ckMeterPkgs/SeningHandbook.aspx?LibFolder=%7b28FD765C-AA2E-4487-A981-D7D7AE7DC3D8%7d Petrol Stage I – Best Practice on Annex IV – Bottom Loading of Road Tankers – here: Requirements for Road Tankers

Verification of requirements of Annex IV referring to the mobile containers



Petrol Stage I – Best Practice on Article 5 Mobile Containers

- After unloading of petrol all vapours shall be retained in the mobile container
- Mobile containers shall accept and retain displaced vapours from service station during loading of the storage tank

See German 20th BImSchV:

"Operator shall ensure that the mandatory inspections according to legislation

on transport of dangerous goods = ADR are taken regularly:

- 1. the overpressure/vacuum valves of mobile containers and
- 2. the vapour tightness with a pressure test at road tankers."

Emissions during Inspections or Tank Cleaning

BREF REF No 50 / BATC 10/2014 BAT 50:

BAT is to use one or a combination of the techniques given below:

Technique	Description	Applicability
i. Manual crude oil tank cleaning	Oil tank cleaning is performed by workers entering the tank and removing sludge manually	Generally applicable
ii. Use of a closed-loop system	For internal inspections, tanks have to be periodically emptied, cleaned and rendered gas-free. This cleaning includes dissolving the tank bottom. Closed-loop systems that can be combined with end-of-pipe mobile abatement techniques prevent or reduce VOC emissions	The applicability may be limited by e.g. the type of residues, tank roof construction or tank materials

Petrol Stage I – Best Practice – other topics

Emissions during Inspections or Tank Cleaning German TA Luft and amended 20th BlmSchV

Waste gases occurring during
 inspection or while the storage tanks
 are cleaned shall be fed to a post combustion system or similar
 measures shall be applied to reduce
 emissions.

Petrol Stage I – Best Practice in Terminals – other topics

Summary:

- **1. Set requirements for tank cleaning**
- 2. Set requirements for avoiding of tank landing for floating roof tanks
- Set requirements for technical tightness of pumps, flanges, sealing of flange joints etc. – use TA Luft

Special thanks to the companies Imhof and Scherzer by supporting this work with technical information



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German country experience - Petrol Stage la