

**Contact Report  
Gasoline Area Source Study**

**From:** Julia Cavalier, MACTEC Federal Programs  
**Date:** November 11, 2003  
**Contact:** Mr. Ray Schaffer  
**Organization:** Weld-It, Los Angeles, CA  
**Telephone Number:** (323) 263-7524, x17

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**Contact Summary:**

We contacted Mr. Schaffer to obtain information on the cost of the California tank truck vapor tightness standards. Mr. Schaffer conducts servicing and inspections of gasoline tank trucks in Los Angeles. He confirmed that the California vapor tightness standards were twice as stringent as those mandated by the federal gasoline distribution NESHAP. He estimated the cost of maintenance and the time required to conduct maintenance as follows (costs do not include the opportunity cost of the time the tanker truck must be taken out of service).

For a standard 4-compartment 9,200 gal semi:

	<u>New truck (&lt; 5 years old)</u>	<u>Older truck (5+ years old)</u>
Time of maintenance and test	3-4 hours	8-10 hours
Days out of service	1	2
Cost to degas the tank <sup>1</sup>	\$100	\$100
Cost of maintenance	~ \$ 400	Can be \$1,000 +
Cost for 10-12 year old trailer		Often \$1,500 +

Mr. Schaffer informed me that the California Air Resources Board (CARB) requires 48 hours notice before an annual tank truck vapor certification was conducted. When conducting tests, his shop normally informs CARB two days before performing the test. Depending on the

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<sup>1</sup>All gasoline-powered tank trucks must be degassed before the test can be performed. Although not required by state regulations, some air quality districts and certain insurance carriers also require that diesel trucks be degassed before performance of the test.

age of the truck (and the apparent performance of vents and seals based on a visual inspection), the shop will begin maintenance either on the day it communicates with CARB or the following day. All routine maintenance will be performed before the test.

The vapor tightness certification was in Mr. Schaffer's words "not a difficult test". The majority of the cost associated with the test is that of maintenance and of taking the truck out of service. Performance is directly related to the age of the truck; largely due to improvements in valve design and accumulated wear and tear. Trucks less than five years old have newer valves that perform better. Older trucks have also accumulated more wear and tear over their operational lives. Valves do not perform as well, and some trucks begin to accumulate cracks in the tank itself.

I asked Mr. Shaffer how many times per year tank trucks typically undergo maintenance. He informed me that there are two tests required by the federal Department of Transportation (DOT) and performed each year. An external visual test must be performed on tank trucks. Annually, DOT also requires that all tank trucks undergo a one lb leak tight test. Up to this point, DOT has allowed EPA Method 27 to substitute for the test. He said that tank trucks less than ten years old were typically serviced once per year. Every five years, DOT also requires that two additional tests be conducted, leading to a total of four tests in the fifth year. Older tank trucks—and he pointed out that many older tank trucks remain in operation—were often serviced 2-4 times per year.