

Timothy Friday

Thank you for the opportunity to comment. Please see the attached comments submitted on behalf of Stolthaven Houston, Inc. We operate a large bulk liquids storage terminal in Harris County with over 200 AGSVs. Please let me know if you have any questions or require clarification - we are happy to assist.

Public Comment on Draft ASVS Guidance Document

June 2025 Version

Comment 1

Stolthaven Houston suggests clarifying the exemption for storage tanks that are operating or designed to operate above 0.5-psig. Reference Pages 18 & 19 of the June 2025 draft guidance document. The draft guidance indicates that a vessel designed to operate in excess of 0.5-psig is exempt from the rule (Page 18). However, the guidance also indicates that a low-pressure storage tank with nitrogen blanketing at or below 0.5-psig is not exempt (Page 18).

Low-Pressure Storage Tanks constructed to API standards can be designed to operate well above 0.5-psig. Such storage tanks can also be operated with a nitrogen blanketing system below 0.5-psig. A low-pressure storage tank may operate a nitrogen blanketing system below 0.5-psig, for example, to reduce nitrogen consumption. However, during tank filling or due to daily diurnal temperature changes, the tank will also operate above 0.5-psig.

If a tank designed to operate in excess of 0.5-psig is always exempt from the rule, regardless of how the tank is operated or blanketed, Stolthaven Houston suggests clarifying this rule exemption. If this is not the case, further clarification would be appreciated.

Comment 2

Stolthaven Houston suggests clarifying the exemption for heated tanks. Reference Pages 19 and 20 of the June 2025 draft guidance document.

The guidance indicates that a tank specifically designed with integrated steam heating is exempt from the rule (Page 19). The draft guidance also indicates that a tank that does not maintain an elevated temperature is not exempt (Page 19).

At a third-party storage terminal, a tank may be constructed with permanent heating capabilities, but on occasion store a cargo that does not require heating, and is therefore maintained at ambient conditions with the heating system turned off or disconnected. Some tanks may only require heating during the cooler winter months, but can be maintained at ambient temperatures without heating during summer. Stolthaven Houston requests clarification on how such tanks and cargos are addressed by the rule. Is a tank equipped with integrated heating always exempt, regardless of if the heating system is operating? Is the tank only exempt when storing heated cargo and the integrated the heating system is turned on?

Comment 3

Stolthaven Houston requests additional clarity for transient or temporary storage vessels. The guidance specifically references vessels with a capacity less than 10,000 gallons, and containers designed for transport or mobility. Totes and plastic IBCs are specifically referenced in the draft as exempt vessels; however, tank trucks and rail cars are not mentioned.

Rail cars will generally have a storage capacity greater than 21,000 gallons. If loaded rail cars and trailers are exempt from the rule, Stolthaven Houston suggests clarifying that exemption. If rail cars are not exempt, further clarification would be appreciated in the guidance document.