San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING
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# COMPLIANCE ASSISTANCE BULLETIN
## February 2013

### *ENHANCED VAPOR RECOVERY FOR ABOVEGROUND GASOLINE STORAGE TANKS*

Owners and operators of aboveground gasoline tanks (ASTs) should be aware of upcoming deadlines for the completion of mandatory vapor recovery upgrades. In 2008, the California Air Resources Board (CARB) adopted Enhanced Vapor Recovery (EVR) performance standards and specifications for ASTs operated in the State. The following is a summary of EVR requirements for San Joaquin Valley ASTs subject to Phase I gasoline vapor recovery requirements. *Please read this notice carefully to properly determine EVR applicability for a given tank.*

**Exemptions for some ASTs within the San Joaquin Valley Air District**

Gasoline tanks exempt from Phase I vapor recovery are also exempt from EVR requirements.

An AST is Phase I-exempt if it meets one or more of the following criteria found in District rule 4621:

- Tank capacity of 250 gallons or less
- Tank capacity of 2,000-gallons or less with a submerged fill pipe *and* installed prior to July 1, 1975
- Tank capacity of 550 gallons or less used *primarily* for the fueling of *implements of husbandry* (as defined in California Vehicle Code 36000)

In addition to Phase I-exempt tanks, the following AST types are excluded from EVR requirements:

- Tanks used to store diesel and other fuel oils
- Tanks used to store aviation gasoline
- Tanks serving a bulk gasoline loading operation (including those serving both a loading rack and a motor vehicle fueling operation)

***ASTs not meeting an exemption above must meet the EVR standards listed below.***

**Standing Loss Control**

Standing Loss Control (SLC) measures control emissions by reducing temperature and pressure variations in tanks through the application of a reflective coating and the installation of a new pressure/vacuum (P/V) vent valve. By April 1, 2013, ***existing*** ASTs (those installed at their current location prior to April 1, 2009) must be retrofitted to meet SLC standards in accordance with CARB Executive Order (EO) VR-301. Newly-installed ASTs must be of one of five tanks listed in ***EO VR-302***. Retrofitting existing ASTs includes:

- Painting the tank with one of several approved coatings*, *and;*
- Installing a SLC-certified P/V valve (Husky model 5885 currently certified for SLC; additional valve options expected in the near future- check current EO revision at the time of installation for updates)

*A list of the SLC-certified coatings is found in EO VR-301-D, Exhibit 1. Some existing, insulated ("protected") tanks do not have to be painted to meet initial SLC compliance. VR-301 currently lists five tanks of specific make and model certified as SLC-compliant. ***The tanks listed in the table below need only be fitted with a***

***certified P/V valve in order to meet SLC compliance if the existing coating is of a type and condition consistent with maintenance recommendations of the tank manufacturer. If repainted for maintenance or aesthetic purposes, a CARB-approved SLC coating or a coating recommended by the tank manufacturer must be used.***

**Existing Protected Tanks Not Subject to SLC Painting** (*if existing manufacturer finish is in good condition*)

| Make | Model | Serial Number Format |
|---|---|---|
| SuperVault | MH Series | 1XXXXX or 2XXXXX<br>(X = number from 0-9) |
| Steel Tank Institute Fireguard | *Not Applicable* | XXXXXX, (X = number from 0-9) |
| ConVault | *Not Applicable* | Z XXXXXX, Z XXXXX, or XXXXXX<br>(Z = letter and X = number from 0-9) |
| Containment Solutions Hoover Vault | V4AAXXXXVXXXX<br>(X = number from 0-9) | *Varies* |
| Jensen Precast Armor Cast | AST XXXXLP, AST XXXXX<br>(X = number from 0-9) | *Varies* |

**Phase I Enhanced Vapor Recovery**

By July 1, 2014, ***existing*** ASTs must be equipped with new Phase I EVR equipment found in either CARB EO VR-401 *or* VR-402. For the purposes of Phase I EVR, existing ASTs are those installed at their current location prior to July 1, 2010. *New AST installations must include Phase I EVR at the time of installation.*

**Permitting and Installation Requirements in the SJVAPCD**

| Modification | Deadline | Permit ("ATC") Required? | Post-upgrade ("start-up") Testing Required? | Certified Installer Required? |
|---|---|---|---|---|
| Painting for SLC Compliance | April 1, 2013 | No | No | No** |
| P/V valve Replacement for SLC Compliance | April 1, 2013 | No | No | No** |
| Phase I EVR Installation | July 1, 2014 | Yes | Yes | Yes |

*****Coating application and P/V valve installation must be performed in accordance with the specifications listed in the VR-301 Installation, Operation, and Maintenance Manual (IOM). Certification that manufacturer recommendations were followed during SLC upgrades must be documented by the operator or their contractor using a "Standing Loss Control EVR Installation Equipment Check List" form found in VR-301. The operator must maintain completed checklists on file and make them available to District inspectors upon request.***

**Additional Information**

*The above-mentioned CARB Executive Orders, Installation, Operation and Maintenance Manual, and other AST EVR information can be found at:* ***http://www.arb.ca.gov/vapor/eo.htm*****.**

*SJVAPCD Authority to Construct (ATC) application forms for Phase I EVR projects can be obtained at* ***http://www.valleyair.org/busind/pto/ptoforms/1ptoformidx.htm*** *or at a District office below.*

***For further information, please contact Dillon Collins (Modesto), Rob Vinson (Fresno), Angela Frantz (Bakersfield) or a Small Business Assistance representative at one of the offices below.***