ADVISORY NOTICE FOR GASOLINE DISPENSING FACILITIES

Enhanced Vapor Recovery for Aboveground Tanks

This advisory notice is intended for all persons who are required to have an Air Pollution Permit to Operate for a retail or non-retail aboveground gasoline storage tanks (GDF) in Placer County. The information in this advisory is intended to augment the California Air Resources Board's (CARB) Advisory 393 for Enhanced Vapor Recovery (EVR) for Aboveground Tanks. Aboveground tanks will be required to begin EVR upgrades with the first deadline on April 1, 2013.

CARB's Advisory 393 explains the three EVR requirements along with their corresponding deadlines for 1: Standing Loss Control, 2: Phase I Vapor Recovery, and 3: Phase II Vapor Recovery. There is a fourth requirement for In Station Diagnostics (ISD), however only those tanks with an annual throughput greater than 600,000 gallons are required to install this equipment.

The first deadline, April 1, 2013 is for Standing Loss Control. An existing aboveground tank will need to be painted white, with a specific paint if that tank is not under current ARB certification, or if certified, is required to be the painted white. Either an existing tank complies because it has been certified by CARB or it will need to be painted with specific white paint outlined in CARB's Executive Order for Standing Loss Control VR-301. All aboveground tanks will be required to install a pressure/vacuum vent valve (PV valve).

At the time the Advisory 393 was written, April 2010, only three aboveground tanks had been certified as for Standing Loss Control; Supervault, Fireguard and Convault. Since then two additional aboveground tanks have been added, Containment Solutions - Hoover Vault, and Jansen Precast – Armor Cast. There may be other manufactured tanks going through the certification process with CARB, however, it is unknown, if there will be additional certifications by the deadline. The Executive Orders for Standing Loss Control can be reviewed at the CARB's website at: http://www.arb.ca.gov/vapor/eo.htm, VR-301 for existing tanks and VR-302 for new tanks.

With the April 2013 deadline, some aboveground tanks, which will require painting, may need to be painted earlier than the deadline due to weather constraints. District staff have begun reviewing permits and inspections to help those with aboveground tanks, comply with the EVR regulations.

Prior to painting, an Authority to Construct from the District must be applied for and obtained: you should apply for a permit as early as possible. District staff will work with applicants on the details of their particular tank.

Detailed information on Enhanced Vapor Recovery can be found at the California Air Resources Board vapor recovery web site at http://www.arb.ca.gov/vapor/vapor.htm or by contacting the ARB Engineering and Certification Branch at (916) 327-0900. For information on permitting and installation in Placer County please contact Don Duffy at (530) 745-2336.

ANNUAL SOURCE TESTING AND OBSERVATION FEES

Placer County Air Pollution Control District (District) continues to look to improving compliance with the District's requirement for the annual testing of vapor recovery systems. The requirement for annual testing is a condition of the permit to operate. We have appreciated the high level of compliance with the testing requirement that has resulted in improved vapor recovery system performance. All facilities must conduct this mandated annual testing. As outlined in both Authority to Construct and Permit to Operate Conditions.

Results must be submitted no later than 30 days following the test(s). Those systems that have failed to conduct their annual testing or submit the results for 2007 will be fined. Additionally those facilities that fail any tests and do not tag out of order the equipment that has failed may be subject to monetary penalties.

In order to assure that these tests are done properly, District staff may randomly observe to verify that the tests are conducted in accordance with the California Air Resources Board approved testing protocols. When District staff observe the annual source testing, the permit holder will be charged a source test observation fee at the District's general labor rate. The observation of testing associated with a new or upgraded facility is covered under the Authority to Construct fees and is therefore not subject to the general labor rate.