



ADVISORY

**SUBJECT: SMAQMD Rule 448
Phase I EVR Requirements**

ADVISORY #04-03

August 2004

**IMPORTANT INFORMATION FOR OWNERS AND OPERATORS OF GASOLINE
DISPENSING FACILITIES**

Purpose of this advisory	The purpose of this advisory is to alert all gasoline dispensing facility (GDF) owners and operators of California Air Resources Board (CARB) Phase I Enhanced Vapor Recovery (EVR) requirements.
What is Phase I EVR?	Phase I refers to transfer of gasoline into underground storage tanks (UST). Components associated with Phase I include connecting couplers from UST to fuel transport trucks, drop tubes, spill buckets, overfill prevention devices, vent piping and pressure vacuum valves. Phase I EVR refers to CARB's EVR requirements for Phase I equipment.
Who needs this information?	This information is important for facilities that have not upgraded Phase I components to EVR standards. Other parties that will find this information useful include GDF owners, GDF operators, facility attendants, construction contractors, performance testing contractors, and environmental professionals.
Background	<p>GDFs are a major source of Reactive Organic Gases (ROG). In an effort to control ROG, and to assist air districts in meeting Federal and State air quality standards, GDFs are required to utilize CARB certified vapor recovery equipment. It is anticipated that ROG emissions will be reduced by 25 tons per day statewide with the full implementation of EVR equipments.</p> <p>In April of 2001, CARB's EVR regulations became effective. The regulations enacted a series of requirements for equipment at GDFs . The various requirements were to be phased in starting April 2001 through April 2009. This advisory focuses on the specific requirement for Phase I EVR systems that were promulgated in July of 2001 and must be completed by April 1, 2005. For a complete list of all EVR Requirements and their implementation dates see page two.</p>
When Was Phase I EVR required?	As with all EVR upgrades, the CARB implementation date starts a four year clock during which existing stations have until the date specified at the end of the clock to make the required modifications. Regarding Phase I EVR upgrades, existing GDFs have had four years to make the necessary upgrades. New GDF installations have been required to install EVR Phase I equipment at the time of construction since July 2001. Existing GDFs that were subject to a Major Modification (for a definition of Major Modification see the notes on page two below the EVR Timeline Table) have been required to upgrade at the time the modifications occurred.
Implications of April 1, 2005 deadline	The deadline for existing GDFs to install CARB Certified Phase I EVR components is April 1, 2005. GDFs operating after this date with non certified Phase I components will be in violation of SMAQMD Rules and subject to monetary penalties. Prior to any modification that will affect the vapor recovery system a Permit to Operate Modification must be submitted to and approved by the Sacramento Air Quality Management District (SMAQMD).

EVR Timeline

EVR Element	Effective Date for New Facilities & Facilities that Undergo a Major Modification*	Installation Due Dates for Existing Facilities
Phase I EVR.	July 2001	April 2005
Phase II Standards & Specifications.	October 2004	October 2008
Unhorse Dispenser. **	April 2003	April 2009
On Road Vapor Recovery Compatible Phase II Equipment.***	April 2003	April 2005
Nozzles Required to Meet Liquid Retention Standards (350 ml per 1000 gallons dispensed gasoline, as determined in CARB Testing Procedure 201.2E).	April 2001	April 2005
Nozzle Liquid Retention Standard lowered to 100 ml/1000 g dispensed gasoline (as determined in CARB Testing Procedure 201.2E).***	October 2004	October 2008
Nozzle Spitting < 1ml per nozzle test (as specified in CARB Testing Procedure 201.2E).***	October 2004	October 2008
Spillage (as specified in CARB Testing Procedure 201.2C).***	October 2004	October 2008
Drip less Nozzles (average three drop per fueling event, as specified in CARB Testing Procedure 201.2D). ***	October 2004	October 2008
In Station Diagnostic (for stations with an annual throughput greater than 1.8 million gallons).***	October 2004	October 2008
In Station Diagnostic (for stations with an annual throughput LESS than 1.8 million gallons and GREATER than 600,000 gallons).***	April 2005	April 2009

* A Major Modification to Phase I components is defined as modification that causes the tank top to be unburied. A Major Modification to Phase II components is defined as the replacement of dispensers or the addition, replacement or removal of 50% or more of buried vapor piping.

** Not required for equipment installed prior to April 1, 2003 UNLESS the facility undergoes a Major modification.

*** These dates are subject to change due to CARB determinations and findings concerning the reliability and efficiency of EVR Certified components. For a listing of currently certified components, systems and updated implementation timelines please contact the Compliance Assistance Program or visit the Compliance Assistance web site at <http://www.airquality.org/compliance/cap.shtml>

Other regulatory requirements and agencies

The SMAQMD is only one agency involved in regulating GDFs. The County of Sacramento Environmental Management Department (EMD) enforces State Water Resources Control Board Underground Storage Tank (UST) regulations such as enhanced leak detection, unerdispenser containment, and secondary containment testing. It may be possible to perform UST upgrades simultaneously with EVR upgrades thereby reducing overall construction costs. For UST information and requirements please contact the EMD at (916) 875-8550.

For more information & technical assistance

For permit application assistance, copies of applicable rules or for further information please call the SMAQMD Compliance Assistance Program at (916) 874-4884. You also may visit our web site at www.airquality.org to obtain permit applications, copies of rules, and information on the SMAQMD.