South Coast
Air Quality Management District
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ADVISORY # 02-13 to Operators of Gasoline Aboveground Storage Tanks

March 21, 2013

Dear Gasoline Dispensing Facility Operators,

The South Coast Air Quality Management District (AQMD) is issuing this Advisory to alert all operators of upcoming requirements applicable to gasoline aboveground storage tanks (AST), such as yours, to help better plan for compliance in the next 18 months. Under the California Air Resources Board (CARB) Enhanced Vapor Recovery (EVR) program, the following two requirements applicable to existing facilities equipped with gasoline AST such as yours will soon become effective:

1. **Standing Loss Control by April 1, 2013, and**
2. **Phase I EVR by July 1, 2014**.

Both of these programs included a four year compliance period from the effective date, which for Standing Loss Control started on April 1, 2009 and for AST Phase I EVR systems started on July 1, 2010. New installations after these dates have been required to meet these requirements. The final compliance deadlines for existing installations are April 1, 2013 for Standing Loss Control and July 1, 2014 for Phase I EVR. Since the two deadlines are fast approaching for existing installations, this Advisory is issued to remind you of these deadlines and provide you with sources of information that can help clarify the requirements. .

Standing Loss Control

Aboveground storage tanks are more susceptible than underground storage tanks to changes in atmospheric temperature which cause the tanks and their contents to expand and contract. These actions cause more evaporation of the stored gasoline and loss of gasoline vapors through the tank vents. Standing Loss Control (SLC) has been set up by the CARB to reduce the creation and release of gasoline vapors from ASTs due to daily atmospheric temperature changes by:

- minimizing temperature changes of gasoline stored within AST, and
- using a better pressure/vacuum (P/V) vent valve to minimize gasoline vapor escaping from an AST.

If you already have an insulated tank that is certified under CARB Executive Order VR-301 or VR-302[1], you need only to ensure the tank is equipped with a CARB certified P/V vent valve. Otherwise, you will need to apply a CARB certified coating listed in VR-301 to the existing tank and also install a certified P/V vent valve.

Phase I EVR

Phase I gasoline transfer refers to the transfer of gasoline from a delivery truck into storage tanks. Gasoline vapors are emitted to the atmosphere during these transfers. CARB adopted the EVR program in 2000 to improve the effectiveness of existing control equipment for Phase I operations. Currently, there are two AST Phase I EVR systems certified by CARB[2].

Please refer to the list of frequently asked questions on the back of this page for further information regarding meeting these requirements.

[1] These Executive Orders are available at http://www.arb.ca.gov/vapor/eo-astslc.htm
[2] Phase I EVR Executive Orders are available at http://www.arb.ca.gov/vapor/eo-astphasei.htm

Frequently Asked Questions

Please consult the web page (http://www.arb.ca.gov/vapor/faq.htm) offered by the California Air Resources Board (ARB) for general information regarding Standing Loss Control (SLC) and Phase I Enhanced Vapor Recovery (EVR) requirements. The following questions and answers provide information specifically related to implementation of SLC and Phase I EVR within the jurisdiction of South Coast Air Quality Management District (SCAQMD):

1. Are all gasoline Aboveground Storage Tanks (AST) subject to SLC and Phase I EVR within the jurisdiction of the SCAQMD?
   All gasoline AST with a capacity of 251 gallons or more are subject to SLC and Phase I EVR requirements. Smaller capacity AST are exempt from these requirements.

2. Is there a need for applying for permit to comply with SLC requirements?
   No, in order to streamline the implementation of SLC, there is no need for a new permit to make changes to existing AST. A permit is required for installation of a new gasoline AST.

3. In a case where an AST is required to be painted, can any of the four ARB certified coatings be used?
   There are requirements limiting volatile organic compound content in a coating in SCAQMD. Of the four coatings certified by ARB to meet SLC, only two coatings meet the applicable limit of the SCAQMD rules and regulations and can be applied within SCAQMD. These two compliant coatings are manufactured by Jones-Blair Paint Company and Ponderosa Paint Company, Inc. Please make sure that you specify either of these two coatings.

4. Do I need to hire contractors with special type of certification to do the modifications?
   Yes, the painting contractor must meet the specifications provided in the ARB Executive Order VR-301 for the coating system you choose to apply and the contractor installing the pressure/vacuum relief valve must possess a valid VI certificate from the International Code Council (ICC).

5. How do I prove that the tank has been properly retrofitted to meet SLC requirements?
   Records must be kept at the AST location in accordance with specifications in the ARB Executive Order VR-301. Generally, these include, but not limited to, the type of coatings applied, date of application, invoices for the coatings and pressure/vacuum relief valve.

6. Is there any test required after installing the P/V valve?
   No test is required for meeting SLC. However, normal periodic testing of the existing tank is still required.

7. What if I want to replace my existing AST with new ones?
   A permit will be required for new installation. New AST vendors must provide you with a new AST that meet both SLC and Phase 1 EVR requirements if the tank capacity is 251 gallons or higher. Please make sure that these requirements are adhered to when ordering a new AST. Testing to demonstrate proper installation is also required.

8. Is there a need for applying for permit to comply with Phase I EVR requirements?
   Yes, a permit is required to modify an existing AST to meet Phase I EVR requirements. In addition, the modification will require evaluation to determine the proper equipment to fit the existing tank configuration. Testing to demonstrate proper installation is also required. Therefore, you are urged to start plan now to meet the July 1 2014 deadline for AST Phase I EVR.