



# Enhanced Vapor Recovery

Burbank  
August 28, 2008

# Agenda

- Introduction
- New Rule Requirements
- Compliance Plan
- Upgrade Issues
- Questions

# Introduction

Danny Luong  
Senior Enforcement Manager

# Background

- Tenth year of Enhanced Vapor Recovery (EVR)  
(First introduced in 1998)
- Past phases have been rough upon due dates
- Started outreach efforts in June 2007
- In March 2008, AQMD Governing Board amended Rule 461 to require early planning

# South Coast Air Basin

➤ Basin Population	17 Million
➤ Number of Vehicles	12 Million
➤ Retail GDF	3,400
➤ Non-Retail GDF	1,100

*Approximately 7 Billion Gallons of Gasoline  
Dispensed Annually into Motor Vehicles*

# Emissions from Gasoline Dispensing

Total emission controlled by EVR when fully implemented:

55,860 tons/year or 153 tons/day

> 47,000 gallons/day when condensed

	Phase I (lbs/1000 gals)	Phase II (lbs/1000 gals)
Uncontrolled Emissions	8.4	8.3
<b>Controlled Emissions (EVR)</b>	0.42	0.32
Emissions Prevented	7.98	7.98

# EVR & ISD Implementation Dates

	<b>New or Major Modifications</b>	<b>Existing Facilities</b>
Phase II EVR	April 2005	April 2009
ISD <b>&gt; 1.8 million gal/year</b> ~38% of Retail GDFs	September 1, 2005	September 1, 2009
<b>&gt; 600,000 gal/year</b> ~56% of Retail GDFs	September 1, 2006	September 1, 2010

**•By September 2010, 94% of Retail GDFs will be required to have ISD**

# EVR Installation Status

Gasoline Dispensing Facilities (GDFs) – August 5, 2008

Total 4,500

✓ Permitted 2,226

✓ Completed Phase II 623 ✓

Stations to permit 2,274

Stations to upgrade 3,877





# Early AQMD Actions

- Started outreach effort early (June 2007)
  - ✓ 3 Public Meetings
  - ✓ 2 Advisories
  - ✓ Meetings with major gasoline dealers
- CUPA
  - ✓ Maintain close coordination
  - ✓ Developed application template
- Local city departments
  - ✓ 4 meetings in different locales
- Amended Rule 461

# Sources of Information

- Information related to Gasoline Dispensing:

<http://www.aqmd.gov/comply/Rule461/EVR-Update.htm>

- AQMD Website:

<http://www.aqmd.gov>

# New Rule Requirements

Bobby Mendoza  
Supervising A.Q. Inspector

# Rule Amendment

- Plan for Phase II EVR upgrade if not installed by October 1, 2008
- Performance and reverification testing schedule
- Testing contractor requirements
- Certification for contractors and operators
- Delay EVR implementation on E85 and ORVR fleets

# Equipment Testing

- More flexible test scheduling
  - ✓ Deadline based on month instead of day of month
  - ✓ Late or missing test will not change schedule
- Conduct Performance Tests within 10 days of transferring fuel to vehicle
- Contractor Sanctions for failing to properly conduct tests

# Contractor Qualification

- Contractors who repair or install equipment need to be certified by:
  - ✓ Equipment Manufacturer
  - ✓ International Code Council (ICC) – Vapor Recovery
- Persons conducting tests of EVR equipment need to be certified by:
  - ✓ AQMD
  - ✓ Equipment Manufacturer
  - ✓ ICC – certification for tester when available

# Delays in EVR Implementation

- Delay EVR requirements for non-retail ORVR fleets until April 1, 2012, provided all are met:
  - ✓ Use dripless and spitless nozzles
  - ✓ Monitor and record storage tank pressure
  - ✓ Dispense only to ORVR equipped vehicles
  - ✓ Maintain fueling records for each vehicle
- Delay EVR requirements for E85 fueling until April 1, 2012 to allow for equipment certification

# Compliance Plan



# Early Planning for EVR

- Increments of Progress within permit application or compliance plan
  - ✓ Application submittal
  - ✓ Equipment order
  - ✓ Installation contract
  - ✓ Testing contract
  - ✓ Equipment installation
  - ✓ Equipment testing
  - ✓ Declaration

# Plan Submittal

Two Options:

- Incorporate Increment of Progress within permit (due 9/1/2008)
- Submit Compliance Plan separate from permit (due 10/1/2008)

Not needed if upgrade completed by 10/1/08

# Option 1

Complete application package to include:

- Form 400-A
- Form 400-CEQA
- Form 400-E-11
- Form 461-CP
- Filing fee of \$1,287.22

Due by 9/1/2008

## Option 2

File Compliance Plan separate from application, package to include:

- Form 400-A
- Form 461-CP
- Filing fee of \$224.60\*

Due by 10/1/2008

\*If ceasing operation after 4-1-09, file Form 461-CP without filing fee

# Form 461-CP

<http://www.aqmd.gov/comply/Forms/R461CP.pdf>

# Plan Approval Criteria

- Must demonstrate ability to comply by April 1, 2009
- Dates must meet:
  - ✓ Application dates must be at least 2 months prior to the planned start of construction
  - ✓ Equipment must be ordered no later than 7 days after all permits are received
  - ✓ Date for signing of contracts for installation and testing must be no less than one month prior to the planned construction start date
  - ✓ Date for starting installation must be on or before March 1, 2009
  - ✓ Date for starting equipment testing must be on or before March 21, 2009

# Compliance FAQs

- What next after plan submittal
  - ✓ District issue an approved compliance plan
  - ✓ Monitor and assure due dates are met
- If the plan was denied
  - ✓ Submit an approvable plan within 30 days
- If missing a deadline
  - ✓ Submit plan alteration to change dates if there is still time
  - ✓ Apply for variance if circumstances are beyond reasonable control
  - ✳ Violation is subject to penalty
- If permit did not include IOP and not complete by 10/1/08
  - ✓ Submit a separate compliance plan by 10/1/08
- Equipment availability issues:
  - ✓ Notify AQMD and ARB

# Upgrade Issues

Danny Luong



# Reported Issues

- Delay in permitting from local jurisdictions
- Equipment reconfigurations
- Waiting for another certified system
- Financing options
- ✳ There is no reported shortage of contractors, equipment supply or testers

# Contact Information

# AQMD Permitting

## ➤ Any Questions Regarding Permitting Issues

✓ Randy Matsuyama (909) 396-2551

✓ Maria Vibal (909) 396-2422

# Contact Information

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# Questions?

