Enhanced Vapor Recovery

Anaheim
August 27, 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
Controlled Emissions (EVR)	0.42	0.32
Emissions Prevented	7.98	7.98

EVR & ISD Implementation Dates

	New or Major Modifications	Existing Facilities
Phase II EVR	April 2005	April 2009
ISD > 1.8 million gal/year ~38% of Retail GDFs	September 1, 2005	September 1, 2009
> 600,000 gal/year ~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

George Kasper

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 – cetification for tester when available

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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?