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

<table>
<thead>
<tr>
<th></th>
<th>Phase I (lbs/1000 gals)</th>
<th>Phase II (lbs/1000 gals)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Uncontrolled Emissions</td>
<td>8.4</td>
<td>8.3</td>
</tr>
<tr>
<td>Controlled Emissions (EVR)</td>
<td>0.42</td>
<td>0.32</td>
</tr>
<tr>
<td>Emissions Prevented</td>
<td>7.98</td>
<td>7.98</td>
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</tbody>
</table>
EVR & ISD Implementation Dates

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