



May 14, 2010

Enhanced Vapor Recovery Systems for New and Existing Aboveground Storage Tanks

The California Air Resources Board (CARB) recently issued Advisory 393, Enhanced Vapor Recovery Systems (EVR) for Aboveground Storage Tanks (attached). The advisory specifies three new requirements for new and existing aboveground storage tanks (ASTs) for standing loss control, Phase I and Phase II. The advisory can be found at ARB's website using the following link: <http://www.arb.ca.gov/vapor/advisories/advisories.htm>.

Standing Loss Control

Standing loss control is a new requirement intended to reduce gasoline temperatures inside ASTs to minimize evaporation. Standing loss control is required for both retail and non-retail ASTs with a capacity of 250 gallons or greater, regardless of throughput.

Phase I

Phase I EVR is required for ASTs at retail GDFs with a capacity of 260 gallons or greater, or at non-retail GDFs with a capacity greater than 550 gallons.

Phase II

Phase II EVR is required for ASTs at retail GDFs with a capacity of 250 gallons or greater, and where more than 2,000 gallons are transferred into motor vehicle tanks in any calendar month. Phase II EVR is required at non-retail GDFs with a capacity greater than 550 gallons and where more than 2,000 gallons are transferred into motor vehicle tanks in any calendar month.

The following table is a summary of compliance deadlines as listed in the advisory:

REQUIREMENTS	New AST	Existing AST
Standing Loss	January 1, 2009	April 1, 2013
Phase I EVR	July 1, 2010	July 1, 2014
Phase II EVR	January 1, 2012	January 1, 2016

Existing AST Balance GDFs with Phase II

If you currently operate a balance AST which has Phase II vapor recovery and need to replace hanging hardware (nozzles, breakaways, hoses, swivels, etc.), you must install components which are certified. ARB issued Advisory 408 which specifies components certified for replacement. This advisory is also attached and can be found at the following link: <http://www.arb.ca.gov/vapor/advisories/adv408.pdf>.

OVER

Prior to upgrading your AST to meet any of these new requirements, you must submit an application to the District and obtain an Authority to Construct. For information regarding applications and/or permitting requirements for ASTs, please contact Mahiany Luther at (858) 586-2725. If you would like information regarding compliance requirements and/or timelines, please contact Randy Smith at (858) 586-2677.

TW:jlh