



**Compliance and Enforcement Division**  
**June 26, 2008**  
**Compliance Advisory**

*This Advisory is provided to inform you about activities of the Air District which may affect your operation. It is intended to assist you in your effort to achieve and maintain compliance with applicable air pollution regulations.*

**ATTENTION: OWNER/OPERATORS OF NON-RETAIL GASOLINE STATIONS WITH UNDERGROUND STORAGE TANKS**

**SUBJECT: ENHANCED VAPOR RECOVERY (EVR) PHASE II UPGRADE REQUIRED**

**TAKE ACTION NOW!**

**Deadline: April 1, 2009**

State regulations require GDF owners and operators to upgrade their vapor recovery systems to help reduce air pollution. The upgrade must be an EVR Phase II certified system that will include new nozzles and a new vapor processor. Note: These equipment upgrades are in addition to those you may have already completed (e.g. Phase I and/or Onboard Refueling Vapor Recovery (ORVR) compatibility upgrades).

**TO MEET THIS DEADLINE YOU WILL NEED TO:**

- Determine the Phase II EVR requirements for your facility;\*
- Obtain Air District and other necessary permits (e.g., City Building and Planning, Fire, and/or Certified Unified Program Agency (CUPA) permits);
- Purchase EVR Phase II equipment; and
- Install and test equipment using a certified contractor by the deadline.

This process takes several months or more! Delaying can result in difficulty obtaining the necessary equipment and a certified contractor. Start now to avoid unnecessary delays and to meet the deadline. An EVR Phase II system GDF upgrade checklist is attached to help you plan and monitor your work.

**YOU BENEFIT BY ACTING NOW BECAUSE YOU:**

- Save money – Costs are expected to rise as the deadline approaches.
- Help keep gasoline in your tanks, which saves dollars and helps reduce air pollution.
- Avoid scheduling conflicts and a shortage of available certified contractors.
- Assure adequate time to obtain necessary permits and to install and test the new equipment.
- Prevent Notices of Violation and potential loss of use for being late (uncertified equipment may be tagged out-of-order to prevent use of non-complying equipment).

\* PHASE II EXEMPTION: If 90% or more of the gasoline fueling facility's fleet are composed of vehicles that have internal or "on-board" vapor recovery systems, then Phase II vapor recovery may not be required. On-board Refueling Vapor Recovery (ORVR) equipped vehicles are late model vehicles but the manufacture date can vary by vehicle type. This exemption has been granted for exclusively fueling newer fleets such as those found at car rental agencies, some private companies, and some city and county public agencies. Call Dennis Baker, Air Quality Technician, at (415) 749-4717 for details.

**OVER**

**CURRENTLY CERTIFIED EVR PHASE II SYSTEMS**

To help you determine which State-certified EVR Phase II system is appropriate for your GDF, view the latest list of State-certified EVR Phase II systems at the California Air Resources Board (ARB) webpage at <http://www.arb.ca.gov/vapor/eo-evrphasell.htm>.

VR-201	<a href="#">Healy Phase II EVR System</a>
VR-202	<a href="#">Healy Phase II EVR System Including ISD System</a>
VR-203	<a href="#">VST Phase II EVR System</a>
VR-204	<a href="#">VST Phase II EVR System Including ISD System</a>

Call ARB at (916) 327-0900 if you are unable to view the webpage or need further information.

**IN-STATION DIAGNOSTICS (ISD)**

You must also install an ISD system if your station has a gasoline throughput of 600,000 gallons or greater per year. ISD systems monitor the performance of the vapor recovery system and provide warnings when there are problems. An ISD system will turn off fueling operations if no corrective action is taken to fix the problem.






You may save money when you install an ISD system as part of the Phase II EVR upgrade. The deadlines to install ISD system upgrades are as follows:

ISD Deadline	Gasoline Throughput (Gallons per year)
September 1, 2009	> 1.8 million
September 1, 2010	≥ 600,000 and ≤ 1.8 million

**CONTRACTOR TRAINING/CERTIFICATION REQUIREMENTS**

You must have a certified contractor install the EVR Phase II system in order to comply with the State requirements. Contractors must be trained and certified by the equipment manufacturer. Be sure to verify that your chosen contractor is certified to install and test the system you plan to install.

**More Information can be obtained from the following sources:**

-  For further questions regarding this Advisory, contact Dennis Baker, Air Quality Technician, at (415) 749-4717.
-  For a copy of District Rules, visit <http://www.baaqmd.gov/dst/regulations/index.htm>.
-  For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline.
-  For permit assistance or Authority to Construct application forms, visit <http://www.baaqmd.gov/pmt/index.htm> or call (415) 749-4990, Engineering.
-  For information about EVR requirements from the California Air Resources Board, visit <http://www.arb.ca.gov/vapor/vapor.htm> or <http://www.evrhome.org>, or contact the ARB Engineering and Certification Branch at (916) 327-0900.

Kelly J. Wee  
 Director of Enforcement

Attachment

KJW:JMM:cwb



**PHASE II ENHANCED VAPOR RECOVERY  
GUIDANCE CHECKLIST (DEADLINE: APRIL 1, 2009)**

Phase	Action Items	√	Date Completed
<b>CHOOSE SYSTEM:</b> <ul style="list-style-type: none"> <li>• PHASE II EVR SYSTEM</li> <li>• ISD SYSTEM</li> </ul>	EVALUATE OPTIONS AND SELECT: <ul style="list-style-type: none"> <li>• HEALY PHASE II               <ul style="list-style-type: none"> <li>i. Without ISD</li> <li>ii. With FFS INCON ISD</li> <li>iii. With Veeder-Root ISD</li> </ul> </li> <li>• VST               <ul style="list-style-type: none"> <li>i. Without ISD</li> <li>ii. With Veeder-Root ISD</li> </ul> </li> </ul>		
<b>SELECT CERTIFIED CONTRACTOR(S):</b> <ul style="list-style-type: none"> <li>• CONTRACTORS               <ul style="list-style-type: none"> <li>➤ PERMITTING</li> <li>➤ INSTALLING</li> <li>➤ TESTING</li> </ul> </li> </ul>	CONFIRM EACH CONTRACTOR'S CERTIFICATION: <ol style="list-style-type: none"> <li>1. PHASE II EVR MANUFACTURER CERTIFICATION</li> <li>2. ISD SYSTEM MANUFACTURER CERTIFICATION</li> </ol> SELECT ALL NECESSARY CONTRACTORS		
<b>OBTAIN PERMITS:</b>  SUBMIT PERMIT APPLICATION(S); OBTAIN PERMITS	BAAQMD <ul style="list-style-type: none"> <li>➤ SUBMIT PERMIT APPLICATION</li> <li>➤ OBTAIN AUTHORITY TO CONSTRUCT</li> </ul> OTHER APPROVAL AGENCIES: <ul style="list-style-type: none"> <li>➤ IDENTIFY ALL REQUIRED PERMITS               <ol style="list-style-type: none"> <li>1. CUPA/FIRE/ENVN.HEALTH</li> <li>2. CITY BUILDING</li> <li>3. CITY PLANNING</li> </ol> </li> <li>➤ SUBMIT APPLICATIONS</li> <li>➤ OBTAIN PERMITS/APPROVALS</li> </ul>		
<b>EXPLORE FINANCING: ALTERNATIVES</b>	<ol style="list-style-type: none"> <li>1. RUST program</li> <li>2. _____</li> <li>3. _____</li> </ol>		
<b>SUBMIT NOTIFICATIONS (I):</b> <ul style="list-style-type: none"> <li>• START-UP AND PERFORMANCE TESTS</li> <li>• CONDUCT PERFORMANCE TESTING</li> <li>• SUBMIT RESULTS</li> </ul>	BAAQMD		
<b>SUBMIT NOTIFICATIONS (II):</b> <ul style="list-style-type: none"> <li>• MEET OTHER AGENCY REQUIREMENTS</li> <li>• OBTAIN FINAL SIGN-OFFS</li> </ul>	<ol style="list-style-type: none"> <li>1. CUPA/FIRE/ENVN.HEALTH</li> <li>2. CITY BUILDING</li> <li>3. CITY PLANNING</li> <li>4. OTHER AGENCIES</li> </ol>		
<b>INSTALLATION COMPLETE</b>	SET UP BAAQMD-REQUIRED ANNUAL PERFORMANCE TESTING		

Disclaimer: The Bay Area Air Quality Management District (BAAQMD) provides this checklist as a tool to assist you plan for and install your Phase II EVR equipment. The District assumes no legal liability or responsibility for the completeness or adequacy of this checklist in helping you satisfy or achieve compliance with all Phase II EVR requirements, including identification of all necessary permits and approvals. You are responsible for meeting the Phase II EVR requirements and deadlines. Please consult with a qualified contractor before starting EVR upgrades.