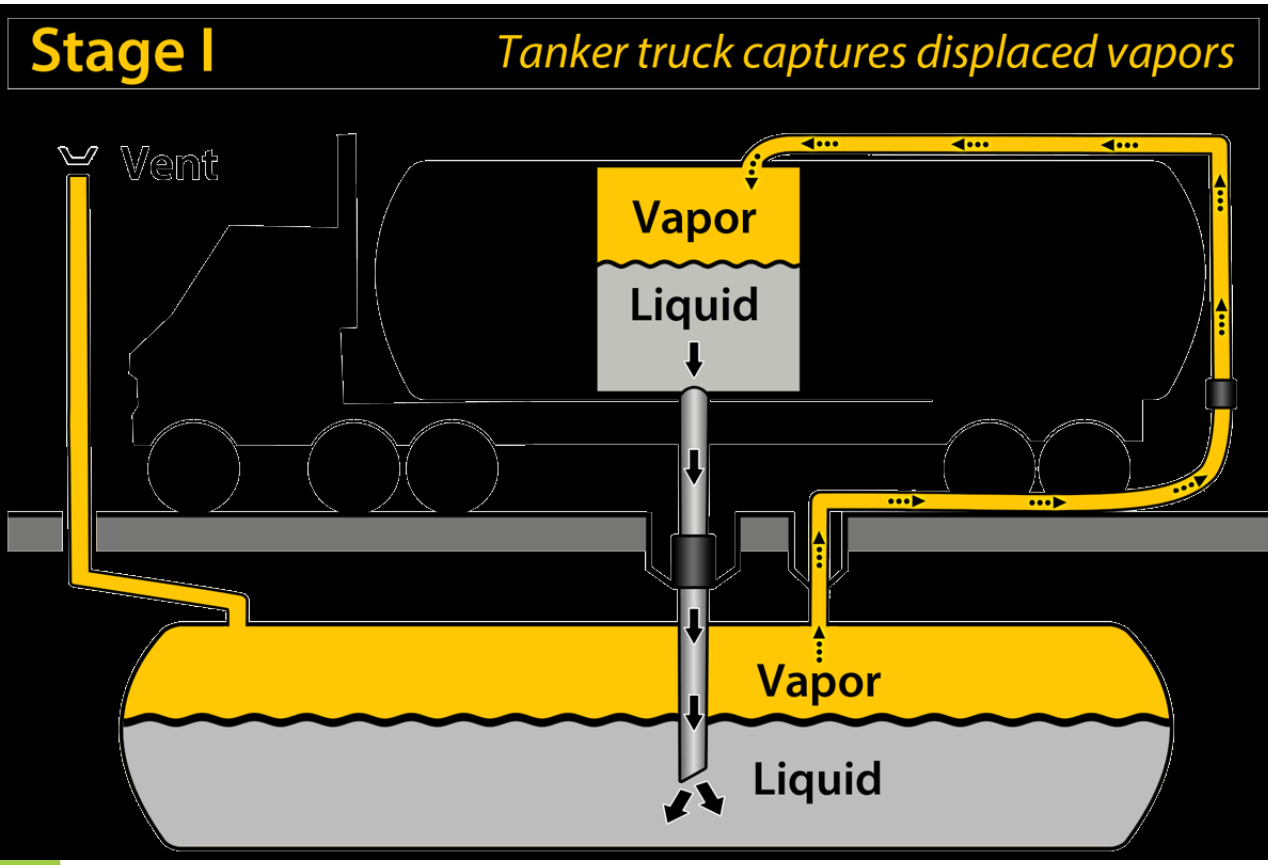
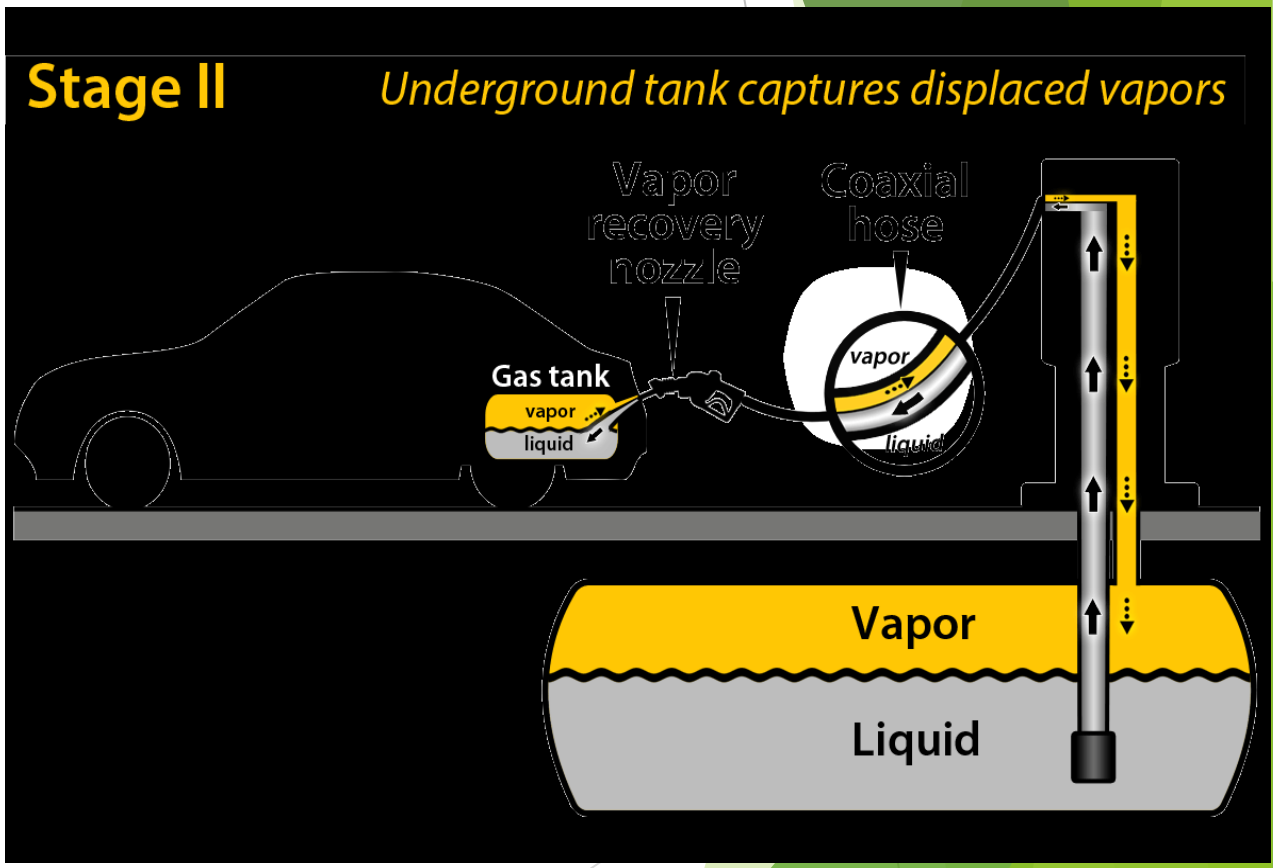
# Summary of proposed changes to gas station regulations

ORCAA Rule 6.1 and 8.12

# What is a Vapor Recovery System?



# What are VOCs?

- **V**olatile **O**rganic **C**ompounds
- *"VOCs are organic chemical compounds whose composition makes it possible for them to evaporate under normal indoor atmospheric conditions of temperature and pressure."* (EPA)
- VOCs are regulated to mitigate ground-level ozone formation and air toxics (BTEX)

# Small Stations, Large Impacts

- Stage I vapor recovery captures an amount of vapor equivalent to ~10-15 gallons of gasoline each time a tanker unloads(1)
- Over 190 million gallons of gasoline was dispensed in ORCAA's jurisdiction in 2017
- Amounts to over 238,000 gallons of gasoline potentially recovered, which is equivalent to over 1.4 million pounds of VOCs (714 tons)

# Goals

- Incorporate ‘permit streamlining’ provisions to reduce permitting time for industry
- Incorporate Best Management Practices (BMPs)
- Include requirements from state and federal air regulations
- Clearly outline testing requirements for gas stations
- Incorporate Best Available Control Technology (BACT)

# Rule 6.1 changes

- To streamline permitting, gas stations will be required to submit a Notice of Intent (NOI) in lieu of a Notice of Construction (NOC) provided that:
  1. The proposed equipment is covered by a current California Air Resources Board (CARB) certification
  2. The gas station is not part of a Title V facility
  3. The gas station is not required by state law to install Stage II
  4. The project does not involve removing Stage II
- 15 day waiting period after submittal

# Rule 8.12 Changes

## *General Requirements for All Stations*

- Incorporates Best Management Practices (BMPs) that are in the federal regulation for gas stations
  - Minimize and clean up gas spills
  - Keep gasoline 'points of entry' properly sealed and covered when not in use
- Submerged fill for gas tanks that are 2,000 gallons or more (a requirement in our current rule)
- 8.12.2 applies to all gas stations, regardless of facility size

# Rule 8.12 Changes

## *Vapor Recovery Requirements for New/Upgraded Stations*

- New and reconstructed gas stations must install California Air Resources Board (CARB) Stage I Enhanced Vapor Recovery (EVR)
  - A requirement across all local clean air agencies in Washington
- Existing stations that do not currently have EVR are required to install EVR when they upgrade (i.e., replace/add tanks, replace Stage I vapor recovery system)
- 8.12.3 only applies to gas stations with a facility-wide storage capacity of 10,000 gallons of gasoline or more

# Rule 8.12 Changes

## *Testing Requirements*

- Stations equipped with Stage I EVR must complete the tests according to Table 1 (next slide)
- Existing stations not yet equipped with Stage I EVR only need to complete a Static Pressure Performance of Vapor Recovery Systems test once a year
  - Some of the other tests in the table cannot be performed on a non-EVR system
- The testing requirements only apply to gas stations with a facility-wide storage capacity of 10,000 gallons of gasoline or more
- These tests are required by other local clean air agencies in Washington
- The table clearly outlines all testing requirements in one place for all gas stations in ORCAA's jurisdiction

| Tank Type | CARB Test | Frequency |
|---|---|---|
| Underground Gasoline Tanks | **TP-201.3** - Static Pressure Performance of Vapor Recovery Systems | Annual |
| | **TP-201.1E** – Leak Rate and Cracking Pressure of P/V Vent Valves | Every 3 Years |
| | **TP-201.3C** – Determination of Vapor Piping Connection to Underground Gasoline Storage Tanks (Tie-Tank Test) | Initial Only |
| | **TP-201.1B** – Static Torque of Rotatable Stage I Adaptors | Annual |
| | **TP-201.1C** or **TP-201.1D** – Leak Rate of Drop Tube/Drain Valve Assembly or Leak Rate of Drop Tube/Overfill Prevention Device TP201.1C has no overfill prevention device and TP-201.1D is required for drop tubes with overfill prevention | Annual |
| Aboveground Gasoline Tanks | **TP-206.3 or TP-201.3B**– Static Pressure Performance of Vapor Recovery Systems | Annual |
| | **TP-201.1B** – Static Torque of Rotatable Stage I Adaptors (only required for ASTs equipped with Rotatable Stage I Adaptors) | Annual |
| | **TP-201.1E** – Leak Rate and Cracking Pressure of P/V Vent Valves | Every 3 Years |

# Rule 8.12 Changes

## *Self-Inspection Requirements for All Stations*

- Self-inspections must be done either once a week or after each gasoline delivery (whichever is less frequent)
- Clearly outlines which items need to be checked (vapor tight caps on adaptors, gasketed seals on all fill-pipes and caps, etc.)
- Self-inspection dates and results need to be recorded
- Corrective action must be taken within 15 days of discovering defective equipment found during performance tests, self-inspections, maintenance checks, or ORCAA inspection.
- Applies to all gas stations

# Rule 8.12 Changes

*Recordkeeping Requirements for All Stations*

- Self-inspections, maintenance and repairs, performance tests, and monthly gasoline throughputs must be recorded and maintained on site for five years
  - Five years is consistent with the federal regulation
- Any NOCs or NOIs must be kept on site for the life of the facility/equipment
- All records shall be made available to ORCAA upon request

*Reporting Requirements for All Stations*

- Submit testing results within 30 days

# Questions?