



Proposed Amendments to Certification Procedures for Vapor Recovery Systems for Aboveground Storage Tanks at Gasoline Dispensing Facilities

July 25, 2019

Why Are We Here Today?

- Improve the cost effectiveness of aboveground storage tank (AST) controls that reduce emissions from refueling of motor vehicles
- Fulfills a commitment made by CARB staff in 2015 to the Board and Air Districts

Aboveground Storage Tanks

- 2,800 gasoline dispensing facilities (GDF) subject to vapor recovery
- 107 million gallons per year
 - <1% of Statewide gasoline consumption

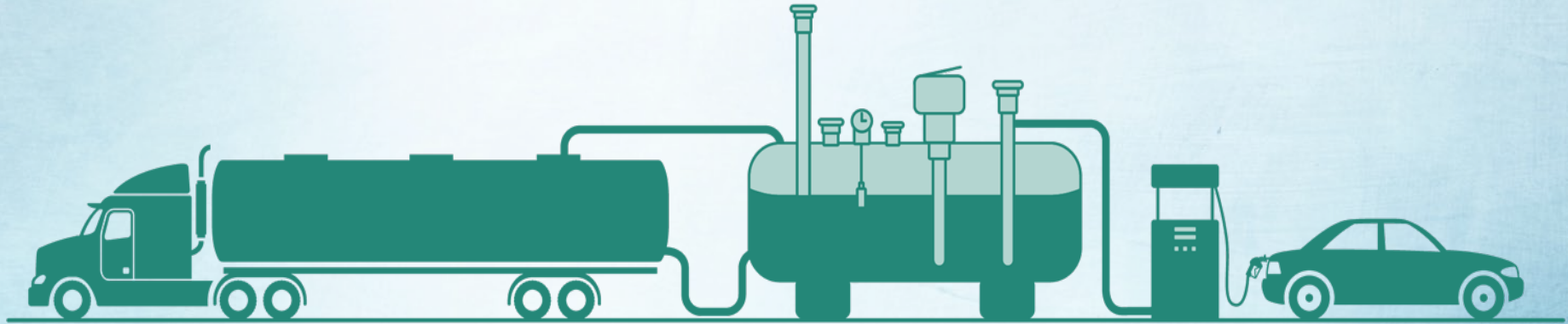


AST Enhanced Vapor Recovery

Fueling Delivery
(Phase I)

Standing Loss Control

Vehicle Fueling
(Phase II)



Status of AST Phase II EVR

- One system certified and limited to a specific configuration
- Existing ASTs required to upgrade by March 13, 2019



AST Configuration and Dispensing

Protected AST



Remote Dispensing



Non-Remote Dispensing



Cost Effectiveness of AST Phase II EVR

- Upgrade costs high (~\$36,000)
- Emission reductions low for low throughput ASTs
- Improved cost effectiveness if annual throughput above 480,000 gallons/year

Staff Proposal

- Amend D-200, Definitions for Vapor Recovery to include new terms and definitions for:
 - Protected ASTs
 - Remote Dispensing
 - Non-Remote Dispensing
- Amend Certification Procedure (CP-206)

Amend CP-206 for Existing ASTs

- **Attainment areas:** use pre-EVR Phase II equipment until end of useful life, then remove and upgrade
- **Non-attainment areas**
 - Throughput 480,000 gallons/year or less: keep existing pre-EVR Phase II equipment until end of useful life, then upgrade
 - Throughput over 480,000 gallons/year: upgrade to Phase II EVR

No Changes for New ASTs

- All new ASTs must install Phase II EVR



Effect of the Proposed Amendments

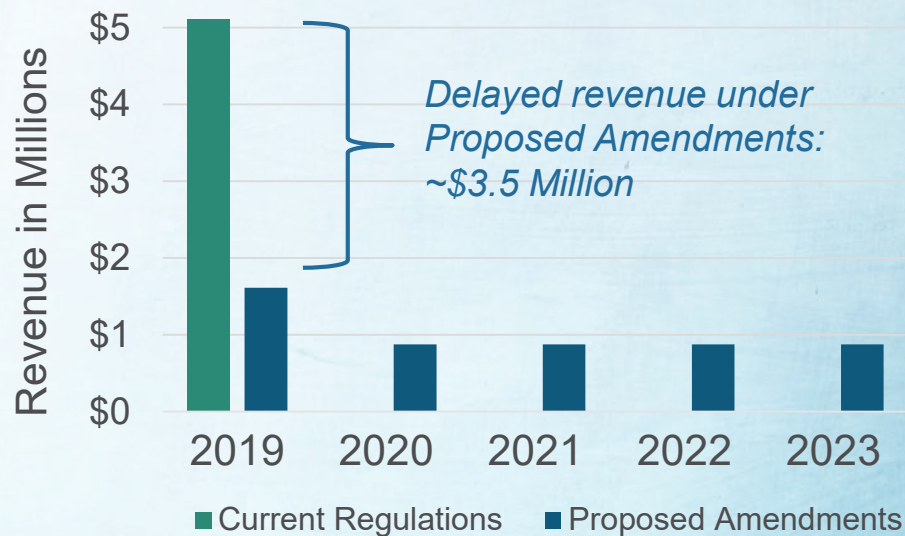
Compliance Time	Equipment Value	Gasoline Vapor Emissions
Allows more time for the 161 ASTs with fewer emissions to comply.	Avoids costs from value lost by upgrading before current equipment has reached end of useful life.	No new emissions over 2018 levels.

Economic Impact of Proposed Amendments

Net Cost-Savings to AST GDF Owners

~\$1.3 Million saved by delayed compliance

Delayed Revenue for California Manufacturers and Installers



Staff Recommendation

- Approve proposed amendments to:
 - Include new terms in Definitions D-200; and
 - Amend CP-206 to modify the applicability of compliance deadlines to upgrade to Phase II EVR for owners of certain AST facilities.