

## Aboveground Storage Tanks at Gasoline Dispensing Facilities

#### **Topics**

What is an Aboveground Storage Tank at Gasoline Dispensing Facility?

What AST at a GDF requires an Air Permit?

Vapor Recovery System

**Enhanced Vapor Recovery** 

Inspection





What AST at a GDF require an Air Permit?

As per N.J.A.C. 7:27-8.2(c)9

Storage tanks for **Gasoline 2,000** gallons or greater



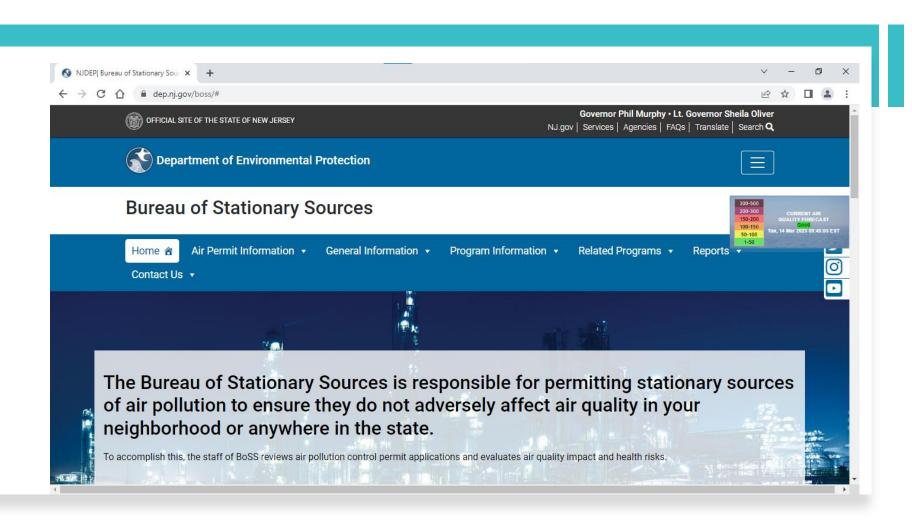
#### What AST at a GDF require an Air Permit?

For help with Air Permits:

https://dep.nj.gov/boss/#

(609) 633-2829

aqppls@dep.nj.gov

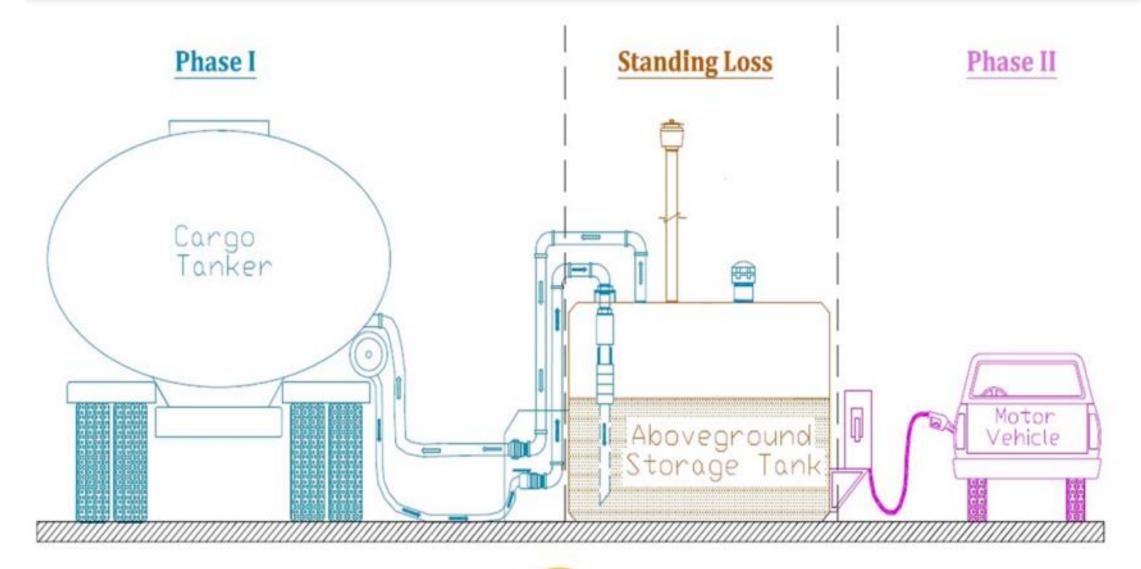




#### WHYVRS?

#### VAPOR RECOVERY = LESS EMISSIONS







#### Vapor Recovery System (VRS)

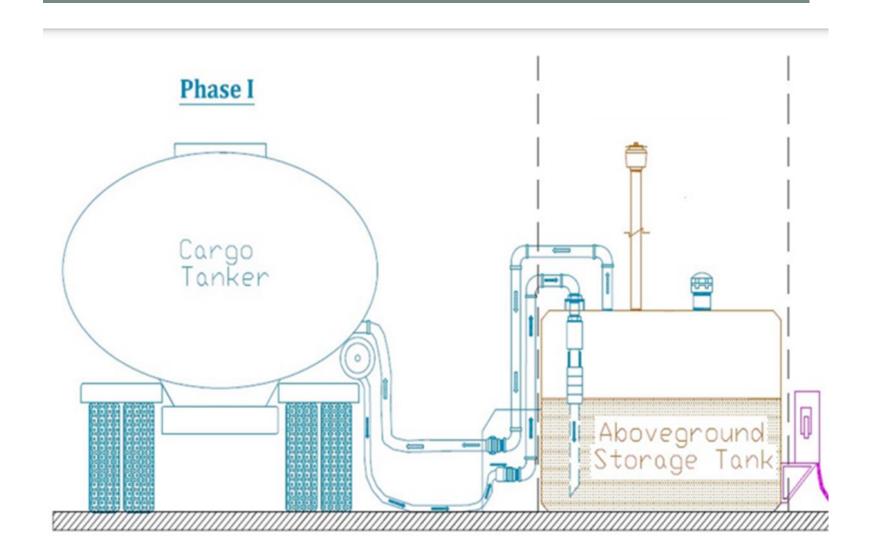
#### Phase I (Stage I) system – <u>Transfer to Tank</u>

- means a system that controls vapors during the transfer of gasoline from a delivery vessel to a gasoline dispensing facility vessel. This system is also known as a Stage I vapor recovery system or a Stage I vapor control system.
- N.J.A.C. 7:27-16.1

#### Phase II (Stage II)system – <u>Dispensing to</u> <u>Vehicle</u>

- means a system that controls vapors during the transfer of gasoline from a gasoline dispensing facility vessel to a motor vehicle. This system is also known as a Stage II vapor recovery system or a Stage II vapor control system.
- N.J.A.C. 7:27-16.1

#### Phase I VRS <u>Transfer to Tank</u>





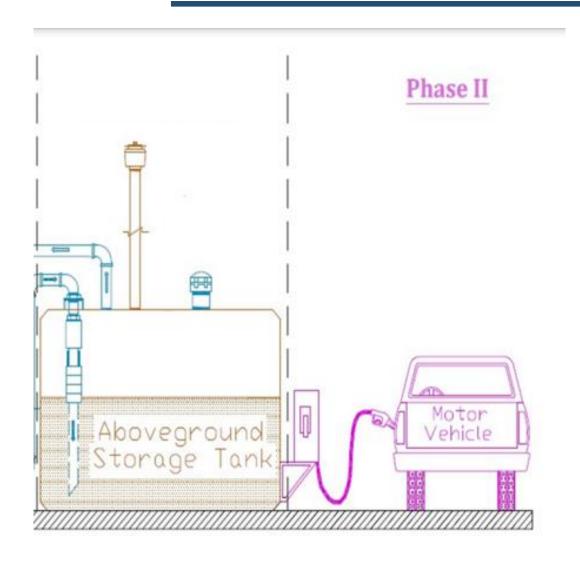
# Phase I VRS Transfer to Tank NEW Dual – Point Common for AST

Two connection points:

Gasoline = fill

Vapor = recovery

### Phase II VRS Transfer to Vehicle



#### What is ORVR and ORVR compatibility?

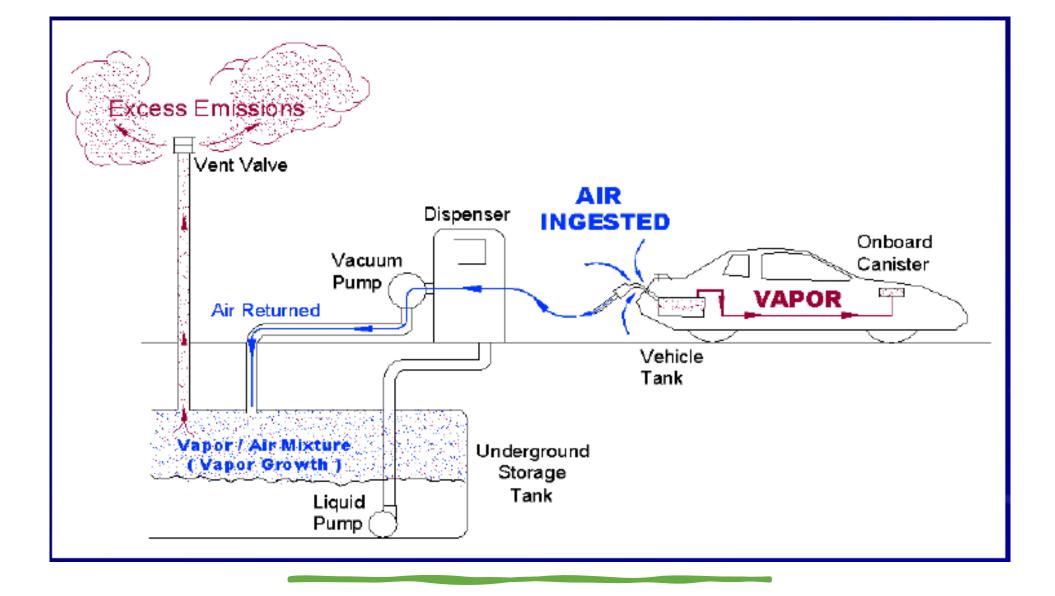
#### Onboard refueling vapor recovery system ORVR system or ORVR

means a vehicle emission control system that captures vapors from the vehicle gasoline tank during refueling.

ORVR-compatible Phase II vapor recovery system

means a Phase II vapor recovery system that is one of the following:

- 1. A vapor balance system;
- 2. A vapor recovery system with tank pressure management emission control equipment installed on the atmospheric vent of the system and operated in conjunction with the Phase I and Phase II vapor recovery systems.
- 3. A vacuum assist system that has ORVR-compatible nozzle; or
- 4. A vapor recovery system used exclusively for the refueling of marine vehicles or aircraft.



## OLD VAC ASSIST NOT ALLOWED Bad for Vapor Control

#### NEW Enhanced Vapor Recovery (EVR)

CARB - certified Phase I & II

## NEW Enhanced Vapor Recovery (EVR) 2017 Rule Amendments

Phase I

**Testing Required** 

**Equipment Updates Required** 

Phase II

Decommissioning for some

**Testing Required** 

**Equipment Updates Required** 

#### Phase I Testing

Annual Testing

Static Pressure Test

Pressure Vacuum Valve Test

Torque Test; if rotatable adapter are installed

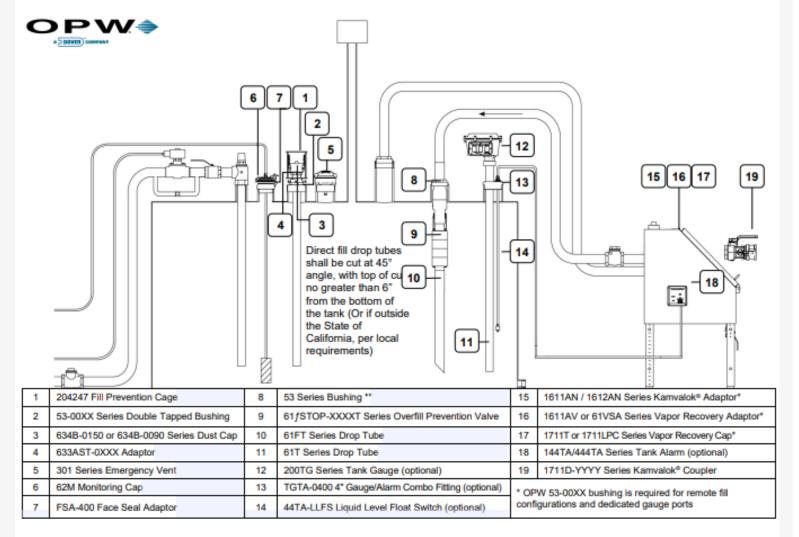
# Phase I EVR CARB - Certified Equipment

CARB-certified Phase I EVR mix and match system (parts from any EVR executive order) within 7 years (on or before December 23, 2024) with maintenance **including but not limited to**:

- o CARB EVR PV valve
- o Rotatable adaptors at dual point loading facilities (existing coaxial exempt)
- o Dual point loading at new stations
- o Drop tube with overfill protection
- o Fuel Blend Compatibility

Go to the CARB website for equipment lists in the EVR executive orders: https://ww2.arb.ca.gov/our-work/programs/vapor-recovery/vapor-recovery-executive-orders

Figure 2M
Typical Configuration of OPW Phase I EVR System for AST with Remote Fill and Remote Dispenser



OPW Phase I EVR System for Aboveground Storage Tanks - Exhibit 2 - VR-401-F

#### Phase I EVR CARB - Certified Equipment

 Go to the CARB website for equipment lists in the EVR executive orders:

 https://ww2.arb.ca.gov/ou r-work/programs/vaporrecovery/vapor-recoveryexecutive-orders



#### Phase II EVR

- Testing
- OLD Phase II compatibility / Decommissioning
- Vapor Recovery Equipment Updates

#### Phase II Testing

Every 3 years test if still have Old Stage II Vapor Balance or Vac Assist (ORVR Compliant)

- Dynamic Backpressure
- Air/Liquid Ratio (vac. assist only)

#### OLD Stage II Compatibility / Decommissioning

- Remove requirements to install Stage II gasoline refueling vapor recovery systems at new gasoline dispensing facilities;
- Require decommissioning of existing Stage II vapor recovery systems within 3 years with the option to keep Stage II beyond the 3 years if the system is ORVR compatible and the system is maintained;
- Decommission in accordance with "PEI RP300-09 Recommended Practices for Installation and Testing of Vapor-Recovery Systems at Vehicle-Fueling Sites" with the following additions:
  - Underground piping removed at a later date when it becomes exposed for another reason, or if the system fails a pressure test due to the underground piping;
  - Certified contractor required;
  - 14 days advance notification to DEP; and
  - Work on business days between 8:00 A.M. and 5:00 P.M.

#### Post OLD Stage II Decommissioning

- Dynamic Backpressure and A/L volume ratio testing no longer required after decommissioning;
- Annual Static Pressure Test and PV Valve Test (New Phase I)
- Annual Torque Test for sites with rotatable adapters (New Phase 1) and Tie-Tank test during decommissioning;

#### NEW Phase II Vapor Recovery Equipment Updates





- CARB-certified dripless/enhanced conventional (ECO) nozzles and low permeation hoses:
  - new facilities
  - when decommissioning or
  - replacing equipment after decommissioning

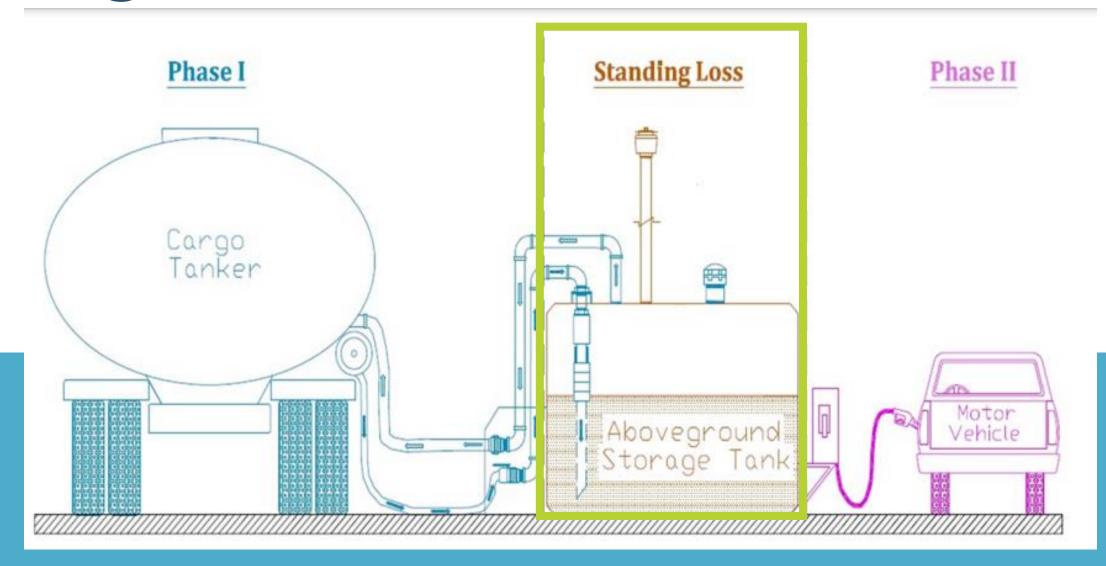
#### Stop at the Click





Overfilling and Spillage or "Stop at the Click":

> During the transfer of gasoline into any gasolineladen vehicular fuel tank, any person refueling a vehicle prevents overfilling and spillage and does not allow the transfer of gasoline to continue after the nozzle automatic shutoff point;



#### CARB EVR requirement for SLC:

- Controls to reduce storage tank breathing losses contained within Vapor Recovery
- SLCs are included in CARB's Phase I EVR Executive Orders (EO), and therefore, they do apply in New Jersey.



#### CARB EVR requirement for SLC:

#### **Existing AST**

- Apply a CARB certified reflective coating and install a CARB EVR-certified P/V valve, or
- 2. Already have a CARB certified make and model AST, install a CARB EVR-certified P/V valve.



#### CARB EVR requirement for SLC:

- Question about painting for existing ASTs:
  - Follow manufacturers maintenance instructions.
  - Check the CARB FAQ

#### NJAC 7:27-16.2(b)1i requires:

The external surface of the tank is painted and maintained white...



#### Need more information...

#### **CARB FAQ**

Frequently Asked Questions: Vapor Recovery Requirements For Gasoline Dispensing Facilities Equipped with Aboveground Storage Tanks | California Air Resources Board

## Exceptions for Phase I

Check NJDEP FAQ for details

Throughput Pre-EVR CARB certified parts Aircraft and Marine Coaxial

#### Inspection

Air Permit

**AST Equipment** 

**Common Issues** 



#### Most Common AST GENERAL PERMIT GP-004B

# DOYOU HAVE A CURRENT PERMIT?

# READYOUR PERMIT!

GP-004B 01/16/2018

#### State of New Jersey

#### Department of Environmental

#### Protection Air Quality Permitting

General Permit (GP-004B)

for

Fuel Dispensing Facility Equipped with a Phase I Vapor Recovery Control System

This General Permit allows for the construction, installation, reconstruction, modification and operation of the following fuel dispensing facilities:

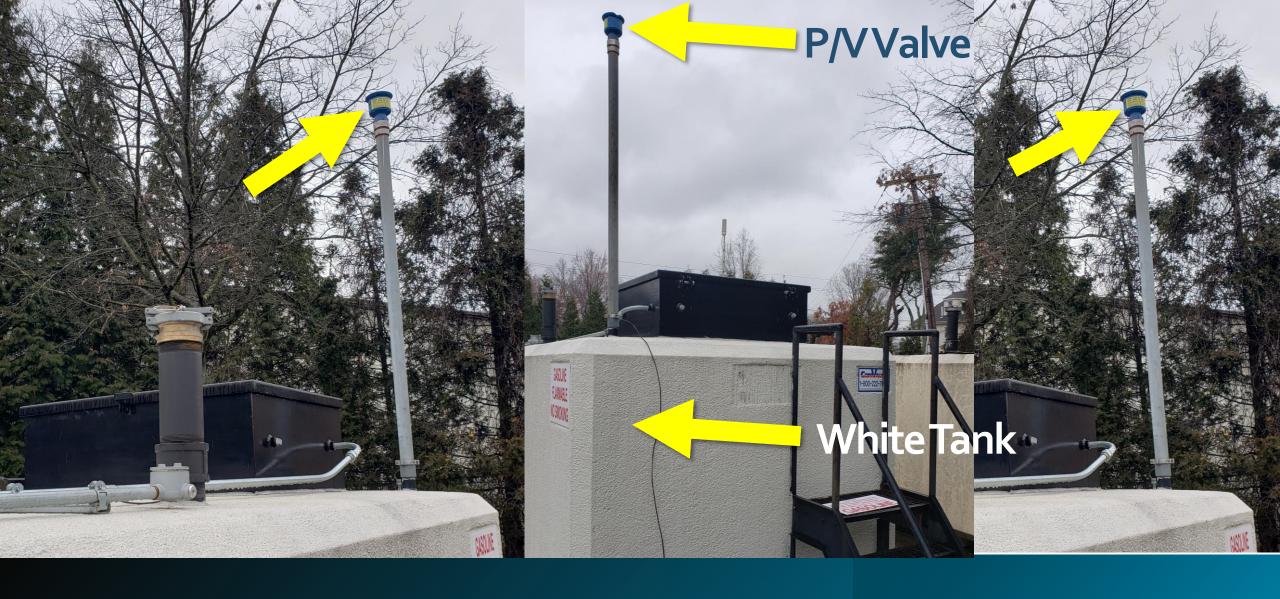
- FD-4B-1: Marina gasoline storage tank(s) equipped with a Phase I vapor recovery
  control system used exclusively for refueling marine vehicles;
- FD-4B-2: Airport gasoline storage tank(s) equipped with a Phase I vapor recovery
  control system used exclusively for refueling of aircraft;
- FD-4B-3: Fuel service station gasoline storage tank(s) equipped with a Phase I vapor recovery control system having an annual facility throughput less than or equal to 20,000,000 gallons;

Each facility may possess only one GP-004B at any time. If a facility wants to add a new source, replace or make changes to an existing source that's already registered under GP-004B, then a new General Permit registration is required. This new General Permit registration will supersede the existing General Permit.





Remote Vapor Recovery and Fill Adaptor in Spill Box



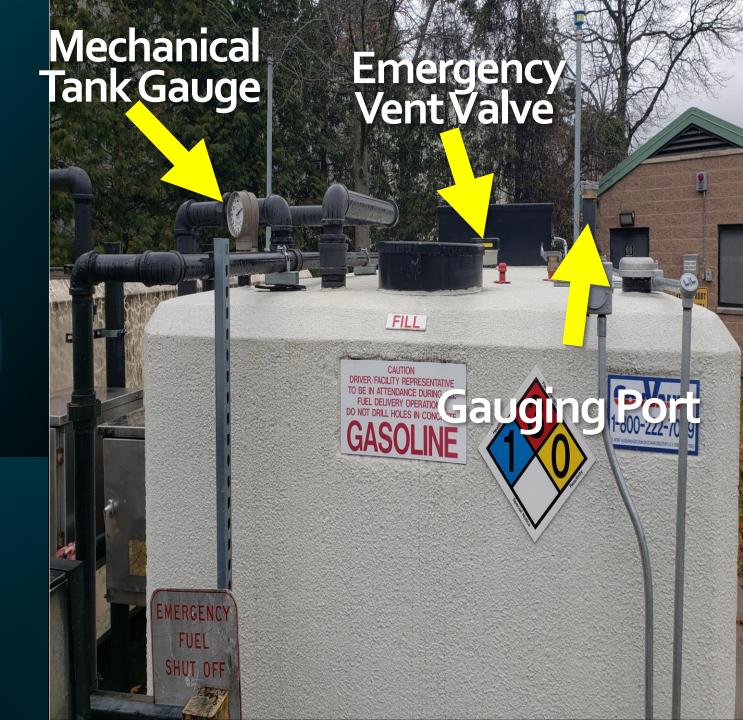
EVR P/V Valve + White Tank = Standing Loss Control (SLC)



## Is the tank CARB EVR? Check Tank Plates

More Phase 1 Parts visual check if EVR

Emergency Vent
Tank Gauge
Gauging Port





Phase 2 EVR Nozzle and Hose

# How do I check if component is CARB EVR?

Get as much information as possible from visual inspection / testing records / supplier / contractor

# How do I check if component is CARB EVR?

## Check the CARB EOs

https://ww2.arb.ca.gov/our-work/programs/vapor-recovery/vapor-recovery-executive-orders

### **COMMONISSUES**

#### **EQUIPMENT PERMIT INFORMATION**

- Are details current?
- Type of Fill / Recovery
- Vapor System
- Maximum Throughput Limit

#### **PERMIT REQUIREMENTS**

- Daily monitoring of equipment and totalizer conducted and recorded
- Annual / Monthly throughput being monitored and recorded

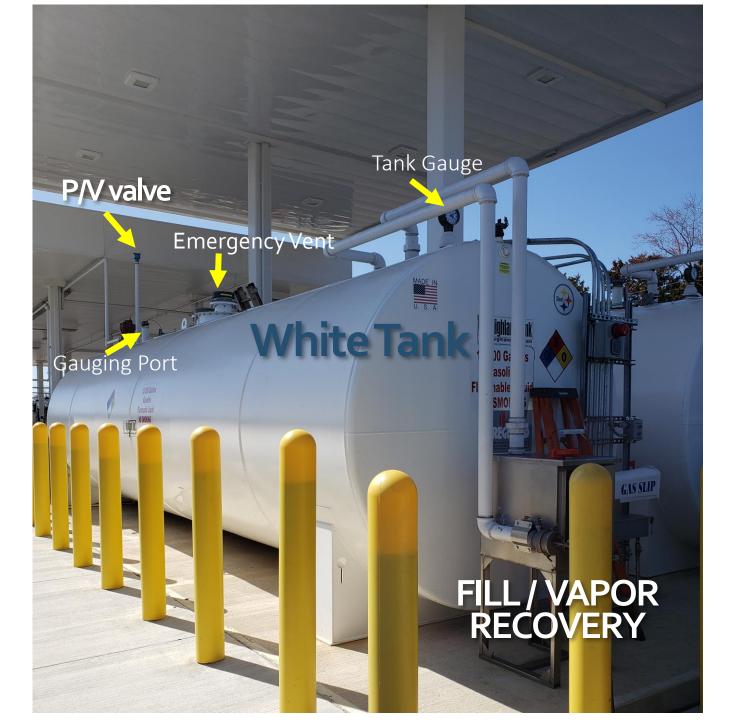
# COMMON

While filling are fill and vapor hoses correctly connected?



# Is the tank and equipment in good condition?









# VAPOR Adaptor and Dust Cap



# QUESTIONS?

# Check out the FAQ by Judy Rand

https://dep.nj.gov/wpcontent/uploads/boss/ permittingguidance/nj-phase-ifaqs-2-16-23.pdf New Jersey Department of Environmental Protection Gasoline Transfer Operations, Vapor Recovery Systems NJAC 7:27-16.3

#### Phase I Vapor Recovery Rule Amendments Frequently asked Questions

Revision Adopted: October 24, 2017 Revision Effective: November 20, 2017 (49 N.J.R. 3590(a)) Revision Operative: December 23, 2017

Last Updated: February 16, 2023

#### Where are the current Regulations?

NJDEP-Air Quality Management Subchapter 16, Section 16.3

#### What are Phase I and Phase II Systems?

"Phase I vapor recovery system" means a system that controls vapors during the transfer of gasoline from a delivery vessel to a gasoline dispensing facility vessel. This system is also known as a Phase I vapor recovery system or a Phase I vapor control system.

"Phase II vapor recovery system" means a system that controls vapors during the transfer of gasoline from a gasoline dispensing facility vessel to a motor vehicle. This system is also known as a Phase II vapor recovery system or a Phase II vapor control system.

"CARB-certified Phase I Enhanced Vapor Recovery system" or "CARB-certified Phase I EVR

# QUESTIONS?



### **Compliance Advisory**

#### NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

Division of Air Enforcement #2023-12

#### Phase I Vapor Recovery Rule Amendments Frequently Asked Questions (FAQ)

#### WHO WOULD BENEFIT FROM REVIEWING THIS FAO?

Anyone who is interested in learning about, or who is subject to the New Jersey Air Pollution Control Regulations for Gasoline Transfer Operations, Vapor Recovery Systems under N.J.A.C. 7:27-16.3.

#### FAQ DESCRIPTION:

The New Jersey Department of Environmental Protection has developed Frequently Asked Questions regarding New Jersey's rule amendments for Phase I Gasoline Transfer Operations and Vapor Recovery Systems at N.J.A.C. 7:27-16.3.

#### WHAT IS THE DEADLINE TO UPGRADE MY PHASE I SYSTEM:

A California Air Resources Board (CARB)-certified Phase I Enhanced Vapor Recovery (EVR) system pressure/vacuum relief vent valve on or before December 23, 2018; and A CARB-certified Phase I EVR system, the components of which shall have been approved in one or more CARB-certified Phase I EVR System executive orders in effect at the time of installation, but the components need not all be approved in the same executive order on or before December 23, 2024.

# Helpful Links for AST

CARB Compliance Alert / NJDEP FAQs for AST

https://www.nj.gov/dep/enforcement/advisories/2023-12.pdf

#### CARB VAPOR RECOVERY EXECUTIVE ODERS

https://ww2.arb.ca.gov/our-work/programs/vapor-recovery/vapor-recovery-executive-orders







**Division of Air Enforcement** 

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NJ.GOV/DEP/Enforcement