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**REQUIRED REPLACEMENT PARTS FOR pre-ENHANCED VAPOR RECOVERY (pre-EVR)  
PHASE I SYSTEMS INSTALLED ON GASOLINE DISPENSING FACILITIES (GDF) WITH  
ABOVEGROUND STORAGE TANKS (AST)**

The purpose of this advisory is to inform GDF owners and operators with ASTs which Phase I EVR components must be used as replacement parts for existing, pre-EVR Phase I components that fail and need replacement. This advisory also emphasizes that pressure/vacuum vent valves certified for standing loss control must be used as replacement parts for pre-EVR ASTs.

**Background:**

In 2008, the Air Resources Board (ARB) adopted new EVR performance standards<sup>1</sup> to reduce emissions from ASTs that store and transfer gasoline. These new standards require some AST owners to install controls that are designed to reduce losses due to evaporation (standing loss control) and losses due to gasoline transfer from cargo tanks to ASTs (Phase I) and from ASTs to motor vehicles (Phase II).

Per the statewide regulation (CP-206, *Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities Using Aboveground Storage Tanks*), new ASTs have been required to have Phase I EVR equipment since July 1, 2010. Under the originally adopted regulation, existing ASTs located in non-attainment areas were required to upgrade by July 1, 2014, however, ARB's Regulatory Advisory<sup>2</sup> provides flexibility to owners and operators of existing ASTs depending on location and annual gasoline throughput. ARB will consider formally adopting provisions of the Regulatory Advisory at its April 23, 2015, Board meeting<sup>3</sup>. Additionally, Executive Order G-70-216 extended the effective dates for Phase I EVR system installation for ASTs where compatible certified vapor recovery equipment are not commercially available. In both cases, certain existing ASTs are allowed to continue using their current pre-EVR Phase I systems until the end of the useful life of the components.

**Required Action:**

According to Section 20 of CP-206, when ARB's Executive Officer has determined that EVR components are compatible and commercially available, only EVR components shall be installed when pre-EVR components are replaced. Based on an engineering evaluation, ARB staff has determined that several Phase I EVR components are compatible with pre-EVR certified Phase I systems. Additionally, ARB staff found that these Phase I EVR components are commercially

<sup>1</sup> Title 17, California Code of Regulations, Section 94016

<sup>2</sup> Please refer to ARB's Regulatory Advisory, originally issued on February 28, 2014 and amended on November 18, 2014, located at <http://www.arb.ca.gov/vapor/regad111814.pdf> and consult with your local air district to determine whether your existing AST can operate with pre-EVR Phase I equipment.

<sup>3</sup> The public hearing notice and staff report was released on March 3, 2015.

available. These components are listed in Table 1. Furthermore, in accordance with Approval Letter #08-04a, issued September 26, 2008, the Husky Model 5885 pressure/vacuum vent valve (P/V valve), and any future P/V valve certified in Executive Orders (EO) VR-301 and VR-302, is a required replacement part for Phase I vapor recovery systems on ASTs covered by the EOs listed in Table 2.

**Table 1: List of Phase I EVR Components Which Are Compatible with Pre-EVR Phase I AST Systems and Commercially Available<sup>4</sup>**

Component	Manufacturer/Model Number	Executive Order <sup>2</sup>
Emergency Vent	OPW 301W-XYZZ	EO VR-401
	Morrison 2440xxxxxxAVEVR	EO VR-402
Non-Rotatable Vapor Adaptor	OPW 1611AV-16YY OPW 1611AVB-EVR	EO VR-401
	Morrison 323xxxxxxAAEVR	EO VR-402
Rotatable Vapor Adaptor	OPW 61VSA-1020-EVR	EO VR-401
Vapor Adaptor Dust Caps	OPW 1711T-7085-EVR OPW 1711LPC-0300	EO VR-401
	Morrison 323CxxxxxxACEVR	EO VR-402
Dedicated Gauging Port with Drop Tube Assembly	OPW 20427 (port cage) OPW 634B-0XXX (dust cap) OPW 634BK-0090 (locking cap) OPW 633AST-0XXX (female NPT Kamvalok adaptor) OPW 53-00XX (double tapped bushing)	EO VR-401
	Morrison 305xxxxxxAAEVR (adaptor) Morrison 305CxxxxxxACEVR (adaptor cap)	EO VR-402
	Morrison 419xxxxxx1TEVR (drop tube)	
Mechanical Tank Gauging	OPW 200TG-XXXYY (gauge) OPW 61T-02LL (drop tube) OPW TGTA-0400 (combo fitting)	EO VR-401
	Morrison 818xxxxxxAGEVR Morrison 918xxxxxxAGEVR	EO VR-402
Liquid Level Overfill Alarm	OPW X44TA-0100 OPW 44TA-LLFS (liquid level float switch assembly)	EO VR-401
Automatic Tank Gauge Port Components	OPW 62M monitoring probe cap and adaptor kit	EO VR-401
	Morrison 305xxxxxxAAEVR monitoring cap and adaptor	EO VR-402
Pressure/Vacuum Vent Valve	Husky Model 5885	EOs VR-301 and VR-302
	Franklin Fueling Systems PV-Zero	

Effective immediately, owners and operators of GDFs with ASTs with certified pre-EVR Phase I systems shall use as replacements the Phase I EVR components listed in Table 1. To determine if an existing AST is equipped with a pre-EVR Phase I system, your permit to operate from the local air pollution control district should reference one of the EOs listed in Table 2 below:

<sup>4</sup> Owners/Operators of ASTs with pre-EVR Phase I systems may choose EVR components from either Executive Order.

**Table 2: Pre-EVR Phase I Vapor Recovery Systems for AST**

Executive Order	Description	Reference
G-70-97-A <sup>5</sup>	Stage I Vapor Recovery System for Underground Gasoline Tanks at Service Stations	<a href="http://www.arb.ca.gov/vapor/eos/eo-97/eo-97.htm">http://www.arb.ca.gov/vapor/eos/eo-97/eo-97.htm</a>
G-70-102-A	Certification of Phase I Vapor Recovery System for Aboveground Storage Tanks with less than 40,000 Gallons Capacity for Gasoline for Gasoline/Methanol Blended Fuels	<a href="http://www.arb.ca.gov/vapor/above/g70102a.pdf">http://www.arb.ca.gov/vapor/above/g70102a.pdf</a>
G-70-142-B	Certification of Phase I Vapor Recovery System for Aboveground Gasoline Storage Tanks	<a href="http://www.arb.ca.gov/vapor/above/g70142b.htm">http://www.arb.ca.gov/vapor/above/g70142b.htm</a>

**Installation and Maintenance Requirements:**

The components listed in Table 1 shall be installed and maintained in accordance with the ARB Approved Installation, Operation and Maintenance Manual (IOM) for the applicable Phase I EVR component.

The IOMs for OPW Phase I EVR and Morrison Brothers Phase I EVR components are available at the following websites, respectively:

<http://www.arb.ca.gov/vapor/eos/eo-vr401/eo-401.htm>;  
<http://www.arb.ca.gov/vapor/eos/eo-vr402/eo-402.htm>.

The IOMs for certified P/V valves are available at the following websites:

<http://www.arb.ca.gov/vapor/eos/eo-vr301/eo-vr301.htm>;  
<http://www.arb.ca.gov/vapor/eos/eo-vr302/eo-vr302.htm>.

**Contact Information:**

If you have questions or need further information, please contact Ms. Donielle Jackson at (916) 445-9308, or via email at [donielle.jackson@arb.ca.gov](mailto:donielle.jackson@arb.ca.gov), or Mr. Sam Vogt at (916) 322-8922, or via email at [sam.vogt@arb.ca.gov](mailto:sam.vogt@arb.ca.gov).

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<sup>5</sup> Some equipment originally certified for use on underground storage tanks (UST) by EO G-70-97-A are appropriate for use on ASTs and referenced in EOs G-70-102-A and G-70-142-B.