

# Aboveground Storage Tank (AST) Enhanced Vapor Recovery (EVR) Workshop

June 7, 2005

## Action Items and Clarifications

### Action Items

1. Definition of White Paint

The pilot and field study testing currently in place is to determine the effectiveness of different control technologies including white paint. The test report will list the specifications of white paint used. ARB will evaluate options for specifying paint colors that are enforceable.

2. Carbon Canister Breakthrough

A comment was received regarding the breakthrough efficiency of the carbon canister as a control technology and how that will be measured. A comparison will be made volumetrically between the 550 gallon control tank (flip-top) and the 550 gallon, carbon canister retrofitted test tank. The carbon canister will also be weighed pre and post testing to determine the amount of hydrocarbons captured by the carbon itself.

3. Pressure Integrity

A question was asked whether pressure integrity will be performed on the tanks in the field study. The ASTs used in the pilot and field study will be evaluated for pressure integrity.

4. 12 Ounce Pressure/Vacuum Valve

ARB will evaluate a 12 ounce Pressure/Vacuum valve as a potential control technology in addition to an 8 ounce Pressure/Vacuum valve.

### Clarifications

1. Exemption of Tanks Below 250 Gallons

The purpose of the Population Survey is to determine the number of ASTs of all size categories and configurations for emission inventory estimates. The district makes the determination whether gasoline storage tanks below 250 gallons are subject to vapor recovery requirements.

2. Standing versus Working Losses

The focus of the pilot and field study testing is to evaluate standing losses ONLY, and does not include the working losses except in AP-42 emission estimates. Standing emission losses are estimated to account for 85% of the total emission losses in ASTs.

The current AST vapor recovery certification procedure contains performance standards for controlling transfer losses. Staff is considering a proposal to require an operational test period of at least 180-days to show compliance with such standards. This information will be presented in future workshops.

3. Emergency Vents

Emergency vents, although required on some ASTs, are not being evaluated in the pilot and field study testing. The current AST vapor recovery certification procedures contain a performance standard of no leaks for the Phase II Emergency Vents. Technologies exist where this standard can be achieved.

4. Number of Dispensing Events

A comment was received regarding the assumed number of dispensing events in the AP-42 model. The number was doubled (from 2 to 4 dispensing events) based on a single comment received from the February 2005 work group meeting to better account for the working losses. It should be noted that the current test plan (pilot and field) is only to determine the standing emission losses from ASTs.