

## **Minutes of the Aboveground Storage Tank (AST) Enhanced Vapor Recovery (EVR) Workgroup Meeting on February 5, 2003**

Meeting Place – Cal/EPA Headquarters Building in Sacramento, California.

Purpose of Meeting – The purpose of this meeting was to review comments on the draft Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities using Aboveground Storage Tanks (CP-206, revised November 5, 2002). At the November 6, 2002 meeting, ARB handed out the revised CP-206 and requested that comments to this draft be submitted by December 31, 2002. To date, ARB received only one written comment.

Introductions - List of attendees are shown below.

AST Inventory Status – ARB sent a letter to fuel carriers in California requesting information on the number of aboveground storage tanks they deliver gasoline to. ARB also requested information regarding AST storage capacities. To date, ARB has received responses from 117 companies. Of the companies who have responded, the preliminary inventory shows a total of 1,418 ASTs used in non-agricultural applications and 4,004 ASTs used in agricultural applications. Over 90% of the ASTs in both categories are in the 250-2,000 gallon capacity range. Additional responses from other fuel carriers will be included as they are submitted.

EVR Test Procedure Development – ARB is developing two EVR test procedures for AST vapor recovery systems. These procedures are for the pressure integrity test and the fugitive emissions test. ARB will develop these procedures using different sizes of tanks. With the assistance of the San Joaquin Valley Unified APCD (SJVUAPCD), ARB has selected two AST sites in which to begin this effort. A comment was made to include other AST variables such as time exposed to sun, color of tank, and tank design.

Comments on Draft CP-206 – ARB staff began the discussion with the following suggested changes/comments:

- Remove the pressure-related fugitive emissions discussion from Section 4 into its own section. The reason for this change is that ARB field data indicates that there are fugitive emissions from an AST during “idle” mode conditions which are independent of those emissions occurring from Phase I and Phase II activities. These emissions will be referred to as “idle-mode fugitives”.
- Incorporate a pressure drop standard for the adapter/splitter.
- For remote or side-fill operations, it was suggested to require a tee at the fill port on top of the tank. The top of the tee will have a plug that could be removed by the district inspector to verify the drop tube requirement.

- Require a ¼ inch fitting on the P/V vent line coupler (coupler which is mounted to the tank bung). This would allow the tank tester or inspector to easily attach their nitrogen supply line to conduct the pressure decay testing. This would also allow the vapor poppet to be leak checked during the pressure decay testing. One comment was that the ¼ inch fitting could be another potential leak path.
- The draft CP-206 does not address certification of Phase I only systems to be used on facilities such as marinas.
- The draft CP-206 does not address what size of AST is required for certification. Will the evaluation include one size of AST or a range of AST sizes as currently marketed by many AST manufacturers?

Other suggestions/comments by the participants included:

- There are many fill and vapor adapter sizes used on AST systems, thus making a tight connection less likely. There needs to be standardization for fill and vapor adapter sizes. ARB is planning to adopt cam and groove specifications for the product and vapor adaptors.
- The current AST pressure decay test procedure (TP-201.3B) does not require the removal of the fill adapter dust cap. If the new pressure decay test procedure that ARB is developing for EVR does require this dust cap to be removed, there are certain overfill prevention valves that will cause the test to fail.
- What is gained by incorporating EVR on AST vapor recovery systems? ARB replied that by requiring tighter pressure decay standards and incorporating a fugitive emission standard, there will be emission reductions and better vapor recovery components. ARB is working on quantifying these emission reductions given all of the new standards and requirements outlined in the draft CP-206.

Upcoming Activities

ARB will be developing a new AST pressure decay test procedure and a fugitive emissions test procedure. Along with these test procedures will be new standards. ARB will use the sites in the SJVUAPCD and other local sites in development of these procedures and standards.

Proposed Next Meeting

The next meeting proposed for mid-April, 2003. The SJVUAPCD's Fresno office will be considered as a possible meeting location.

Presentation and Minutes of Past Workgroup Meetings– Presentations and minutes of previous workgroup meetings can be viewed on ARB's vapor recovery website at <http://www.arb.ca.gov/vapor/ast/archive.htm#minutes>.

Attendees:

Pat Bennett, ARB  
Joe Guerrero, ARB  
Cindy Castronovo, ARB  
Paul Thalken, ARB  
Stephanie Hernandez, ARB  
Vincent Bunac, ARB  
Rich Stevens, Morrison Bros. Co.  
Ronald Pilkington, Bay Area AQMD  
Tom Busenbark, San Joaquin Valley Unified APCD  
Kevin Tokunaga, Glenn County APCD  
Sandra Duval, CIOMA  
Lori Williams, Sierra Research  
John Ekhtiar, Convault  
Ed St. Amour, Titan-PME Sales  
Jeff Baier, Tempresco (OSECO)

Via Teleconference:

John Schroeder, San Joaquin Valley Unified APCD  
Ralph Crawford, South Coast AQMD  
George Kasper, South Coast AQMD  
John Merrill, Jensen Precast  
Don David, Clay & Bailey Mfg. Co.