

Air District – CUPA Areas of Overlapping Responsibility

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Enhanced Vapor Recovery

- Overview
- Phase I EVR
- In-Station Diagnostics
- In-Station Diagnostics with Continuous Monitoring (VPH)
- EVR for USTs vs EVR for ASTs

Phase I EVR

- ELD Testing compatibility issues
- Overfill Prevention Devices
- Spill Buckets
- ICC Certification

Phase I EVR

ELD Testing compatibility

- Testing company personnel frequently not factory trained for Phase I nor ICC UST Service Technicians or UST Installer/Retrofitters
- Pre-test leaks frequently found on tank top fittings
- Torque specs critical for CARB-certified Phase I systems
- Testers over-tighten, often damaging O-rings and causing eventual compliance testing failure after metal-to-metal tightness has loosened

Phase I EVR Overfill Prevention Devices

- Part of CARB-certified Phase I system
- SWRCB requirement to be present (if no ball float or audible/visual alarm method is used)...Not required by CARB
- Neither SWRCB or CARB requires test for functionality or repeatability
- Some jurisdictions will not allow ball floats

Phase I EVR

Containment Structure Testing

- SWRCB requirement, part of CARB-certified Phase I system although no CARB-required test
- Spill bucket testing (lake test) required by SWRCB
- CARB test (TP-201.1C and TP-201.1D) for drain valve does not test spill bucket for release to environment

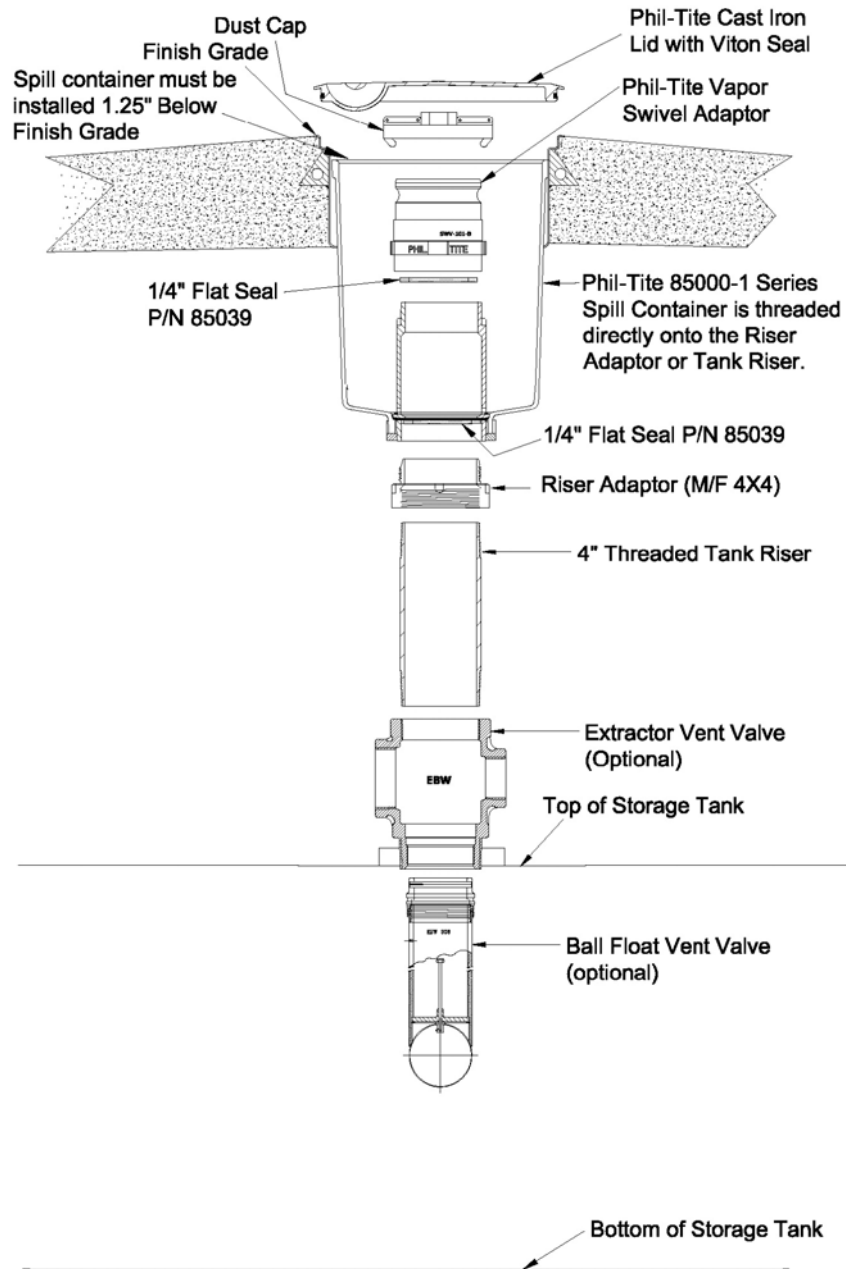
Phase I EVR

Containment Structure testing

(cont)

- Spill buckets might pass CARB drain valve testing, but fail the lake test
- Design issues, installation problems, poor maintenance contribute to poor seal leading to failed test
- Issue could be minimized by requiring product fill sump rather than direct bury

Typical Vapor Recovery Installation Using Phil-Tite System



Phase I EVR ICC Certification

- Phase I equipment is CARB-certified but considered a part of the UST system
- CARB requires Phase I equipment installers to be trained by the manufacturer
- Air districts require Authority to Construct permits for modification but might not be knowledgeable about ICC cert requirement
- CUPA might not be informed of changes or modification if air district does not notify

In-Station Diagnostics (ISD)

- Currently, this ISD is only certified with the Healy EVR Phase II system. Has a “Clean Air Separator”, which is an above ground bladder tank.
- Many additional sensors and tubing are required throughout the VR/UST system that terminate at the TLS-350. UST alarm history can be erased by specific sequencing of activity. ISD alarm history cannot be erased by sequencing activity.

In-Station Diagnostics with Continuous Monitoring (VPH)

- The ISD has a tank ullage pressure management module that can put the ISD into alarm or shutdown mode if tank pressure set points are exceeded for specified lengths of time. This might exacerbate an alarm condition because the Veeder-Root SCVS replenishes the vacuum zones by putting air into the headspace of the UST