

CELLY SERVICES, INC.

Environmental, Health and Safety Services

DEALER ALERT

TO: Environmental Health and Safety (EHS) Coordinator
FROM: Sam Celly, MS JD CSP REA
SUBJECT: California Regulation Requiring Upgrades on Gasoline Dispensers (Phase II EVR)
DATE: April 10, 2008

This is the Godzilla amongst all upgrades required for the underground gasoline tank dispensers. California Air Resources Board (CARB) has adopted regulations that require upgrades to the gasoline dispensers by April 1, 2009. The Phase II Enhance Vapor Recovery (EVR) systems are required to be installed on dispensers with underground gasoline tanks. Aboveground gasoline tanks are not impacted by this regulation, as yet! First, a perspective of recent upgrades on gas tanks & dispensers:

By December 31, 2003: All gasoline dispensers required upgrades including the installation of dispenser pans and conducting various tests such as Vapor Recovery Tests, Monitoring System Testing, Secondary System Testing and the ever lasting Tank Precision Test.

By January 1, 2005: Designated operator required for the gasoline tank. The tank must be inspected every month by the designated operator and has certain employee training requirements. The designated operator is a certification given after completion of a test.

By April 1, 2005: All Phase I recovery system were required to be changed to the Enhanced Vapor Recovery System. This was basically applicable to the filling equipment on underground tanks and tank vent lines.

NOW BY APRIL 1, 2009: The gasoline dispenser needs Phase II EVR upgrades. The upgrades consist of a vacuum pump inside each dispenser to suck the gasoline vapor and transport them to a metal tank with a bladder. The gasoline vapors are expected to condense in the bladder and go the underground tank. The hoses, nozzles, brake-aways must be compatible. The electrical system will probably need an upgrade too. The vapors coming from the gas tank on an automobile are condensed and sent to the underground gas tank rather than polluting the air. If you dispense, most unlikely, more than 600,000 gallons of gas a year, further upgrades are needed.

WHAT IS IT GONNA COST: We have been advised by multiple contractors that depending upon the gasoline tank and dispenser configuration, the upgrades can cost anywhere from \$17,000 to 25,000 with one tank and one dispenser. Only two EVR systems have been approved by the CARB to date. These are as follows:

- Franklin Healy E.O. VR-201 or 202
- VST Phase II EVR E.O. VR-204-A

Be mindful that the upgrades are going to need permit from your local AQMD, as well as other civic departments such as the Fire Department and City Planning Department.

Summary: Decide whether you really want to keep the gas tank. If you do, call your contractor and get the upgrade process started!

Reference: Visit <http://www.arb.ca.gov/vapor/vapor.htm> or <http://www.arb.ca.gov/vapor/evrphaseII.htm>