

Stage II Vapor Recovery Decommissioning Rule Workshop

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Important Considerations

- * Restroom locations
- * Emergency Exits
- * Mute cell phones
- * Stakeholder updates

Agenda

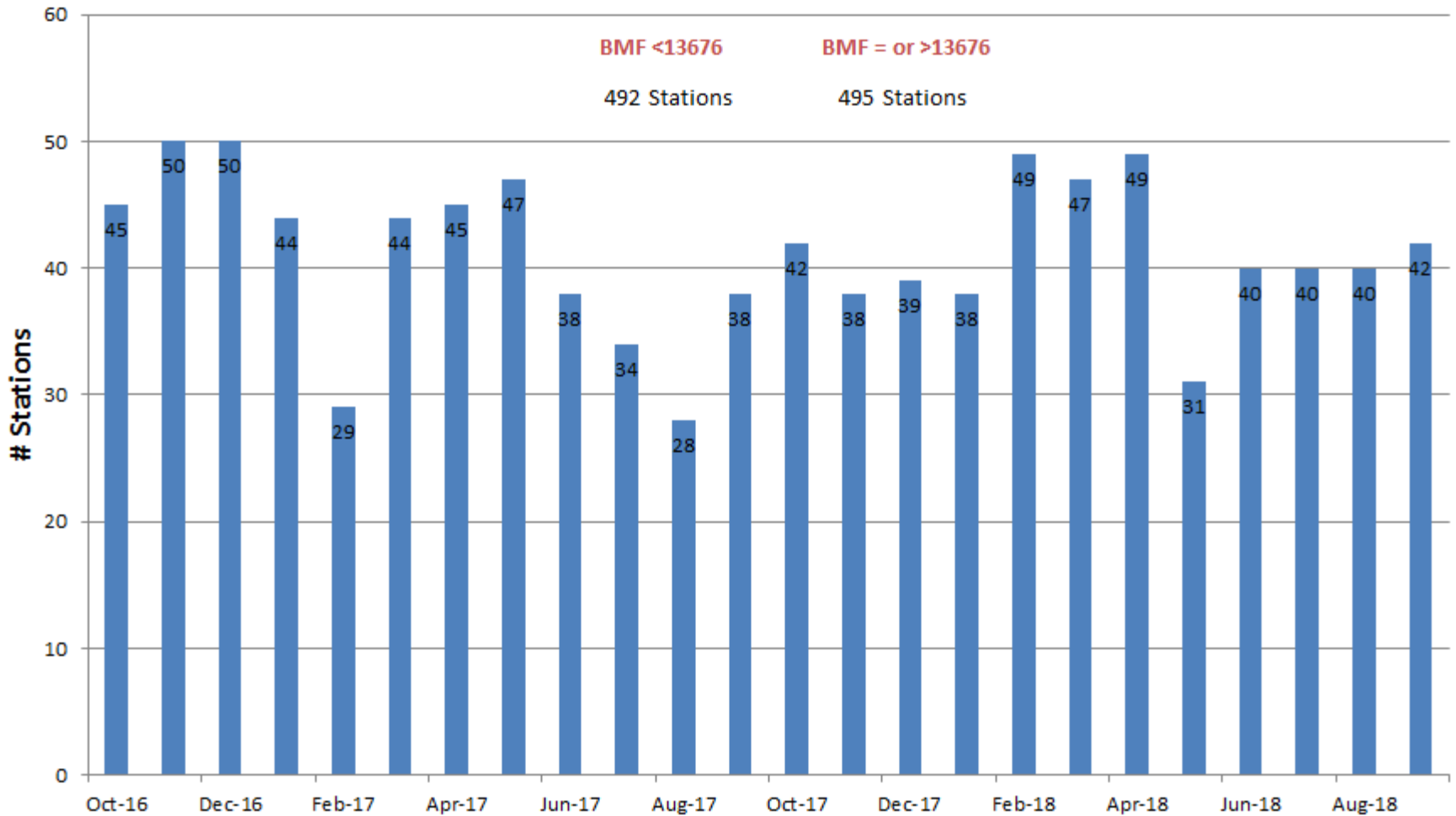
- * Review Comments/Proposed Changes from August Workshop
- * Review Proposed Rules
- * Next Steps

Comments Received August Workshop

- * Provide more flexibility for decommissioning
- * Conduct 2” pressure decay test instead of the 10” pressure decay test

Flexibility

Stations Decommissioning Per Month - 992 Locations



Does not include exempt stations that may have Stage II installed.

Flexibility, cont.

- * Default decommission:
 - * BMF <13676 = Year 1 (October 1, 2016 – September 30, 2017)
 - * BMF >13676 = Year 2 (October 1, 2017 – September 30, 2018)
 - * Exempt sites = Any time during 2-year time period
 - * Sites replacing all dispensers may decommission at time of dispenser replacement with permission of the Department
- * Sites may submit alternate decommissioning plan for consideration by December 31, 2015
- * Specific plan requirements are in R20-2-913(5), (6), (7)
- * Sites that decommission after their annual test month are required to conduct the stage II vapor recovery test

2" vs. 10" Pressure Decay Test

- * Stated arguments for 2" test:
 - * 10" test not used outside San Diego and Arizona
 - * Require minimum and maximum ullage requiring special fuel deliveries
 - * Require minimum 2 hours shut down time on testing day
 - * Pressure system beyond what it would normally vent

2" vs. 10" Pressure Decay Test, cont...

* Review of ullage and delivery requirements:

Test Criteria	2"	5"	10"
Minimum Ullage	25% or 1,000 gallons, whichever is less	25% tank capacity or 500 gallons, whichever is greater	15% or no less than 300 gallons for tanks under 1,000 gallon capacity
Maximum Ullage	25,000 gallons	15,000 gallons	10,000 gallons for 5 minute test, 20,000 gallons for 10 minute test, 30,000 gallons for 15 minute test
Delivery Prohibition	3 hours	3 hours	8 hours
Customer Fueling Prohibition	30 minutes	During test	During test
Length of Test	5 minutes	5 minutes	5 to 15 minutes depending on ullage

- * This compares the 10" "short" test. The option to perform the long test will still be available which has a 3-hour delivery prohibition

EXAMPLE – FUEL REQUIREMENTS

* 3 – 10,000 gallon manifolded tanks

	2"	5"	10"
Min Fuel Amount	5000	15000	0
Max Fuel Amount	22500	22500	25500

Pass/Fail Criteria per Test

<u>Ullage (gal)</u>	<u>2"</u>	<u>2" % loss</u>	<u>5"</u>	<u>5" % loss</u>	<u>10"</u>	<u>10" % loss</u>
500	0.44	78%	1.7	66%	8.0	11%
1000	0.93	54%	2.92	42%	9.0	2%
5000	1.72	14%	4.49	10%	9.8	2%
10000	1.85	8%	4.74	5%	9.9	1%
15000	1.9	5%	4.82	4%	9.8	2%
20000	1.93	4%	4.87	3%	9.8	2%
25000	1.94	3%			9.9	1%
30000	N/A		4.91	2%	9.9	1%

2'' vs. 10'' Pressure Decay Test, cont...

- * The Department reviewed the requirements for the 2'', 5'', and 10'' test:
- * The pass/fail thresholds for 2'' and 5'' test are much lower than the 10'' test
 - * Could be viewed as less stringent in protecting air quality
 - * 2'' test might not detect failures

Stage I Requirements

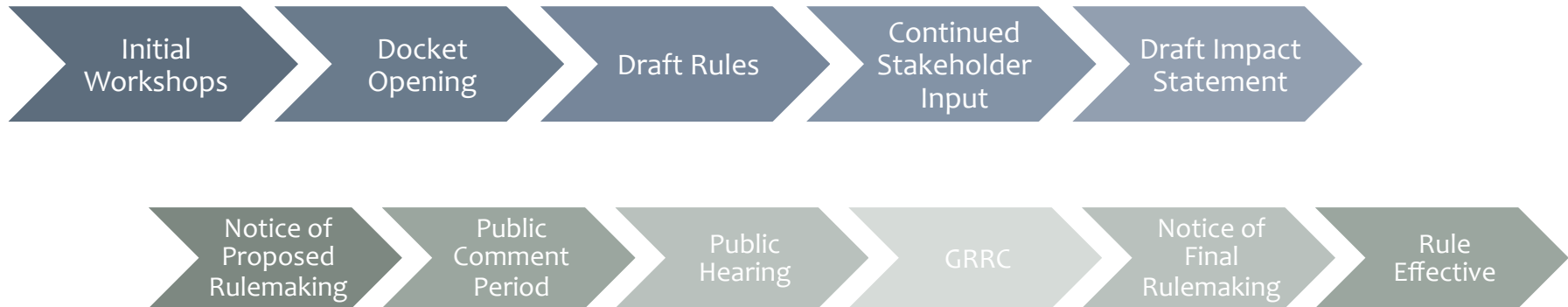
Goal: Maintain existing standards for Stage I systems

- * Eased reporting requirements for throughput-exempt stations from monthly to annual
- * Incorporated minimum standards for installation of Stage I systems to clarify ATC requirements
- * Maintained annual testing requirements
- * Eased inspection requirements from daily to once every 7 days

Proposed Rule Review

Rulemaking Timeline

Must be effective prior to October 1, 2016



(Process after Notice of Proposed rulemaking takes minimum 6 months)

Next Steps

- * Submit comments by Friday, January 2:
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- * AZDWM will review comments and draft final proposed rule