

Clarification of Department Policy

Use of CARB EVR Phase I Pressure/Vacuum Vent (P/V) Valves with Pre-EVR Stage II Vapor Recovery Systems February 13, 2013

California Air Resource Board (CARB) certifies equipment for Phase I and Phase II vapor recovery systems (referred to as Stage I and Stage II in Arizona), and components used at gasoline dispensing facilities following the CARB Certification Procedure CP-201. A CARB Executive Order is issued certifying the system after all of the applicable certification requirements have been successfully completed. CP-201 was adopted by CARB in December 1975 and has been amended numerous times since its inception.

Arizona Revised Statutes (ARS) 41-2132(A) require that all equipment installed be certified by CARB¹. Therefore, when a gasoline station is built or modified, they must use CARB-certified equipment as stated on the applicable CARB Executive Orders. The CARB Stage I and CARB Stage II equipment is contained in separate Executive Orders, and each lists the equipment components approved for use under the specified Executive Order.

In April 2001, CARB began requiring the installation of more stringent Stage I vapor recovery systems, known as "Enhanced Vapor Recovery, or EVR." EVR requirements for Stage II vapor recovery systems installed in California were required beginning April 2005. Executive Orders issued prior to the EVR requirements are referred to as "Pre-EVR CARB Executive Orders."

Most gasoline stations in Arizona have installed Stage II equipment under pre-EVR Executive Orders. Many of the commonly used pre-EVR CARB Executive Orders (such as G-70-150-AE, effective July 12, 2000) list specific Pressure/Vacuum Valves that are to be used with the equipment. Additionally, these executive orders provide a general statement allowing:

Any CARB-certified valve with the following pressure and vacuum settings, in inches water column (wc):

Pressure: 3.0 ± 0.5 inches water column.

Vacuum: 8 ± 2 inches water column.

In Arizona, the Department requires pressure/vacuum vent valves to meet these requirements.

As with the Stage II equipment, Stage I equipment must meet the requirements of the stage I system installed. In 2006, CARB updated the certification requirements in CP-201 for the pressure/vacuum vent valves to require certification of new equipment to meet the following standards:

Pressure: 2.5 to 6.0 inches water column

Vacuum: 6.0 to 10.0 inches water column

Due to this change in the CARB certification procedures, gasoline stations using Stage I equipment under a CARB EVR executive order issued after 2006 have a Stage I System with a pressure/vacuum vent valve that is certified to a different standard than the Stage II executive order will allow.

¹ ARS 10-2123(A): A person shall not offer for sale, sell, install or use a new gasoline vapor recovery system, or any new or rebuilt component parts of the system, unless the system or component part has been certified by the California air resources board as of March 31, 2001 or after that date, or has been approved by a third party accredited to test equipment and recognized by industry and the department, and has not been rejected by the department. The department shall maintain and keep current a list of stage I and stage II vapor recovery systems and component parts that are approved by the department. Only those systems that are approved shall be used in this state. All certified vapor recovery components must be clearly identified by a permanent identification affixed by the certified manufacturer or rebuilder.

The Department will accept the use of the pressure/vacuum vent valves listed in the Stage I CARB EVR Executive Orders as long as the following conditions are met:

1. The pressure vent valve has to be listed as an allowable component in the Stage I CARB Executive Order that is applicable to the gasoline station
2. When performing annual tests, or other tests as may be required by the Department, the pressure vacuum vent valve must meet the pressure and vacuum settings as required in the Stage 2 Executive Order applicable for the station

Alternatively, the department will allow use of a P/V valve that has been approved by a third party in accordance with Arizona Revised Statute §41-2132(A). See the document titled "Certification Process for Stage I and II Vapor Recovery Equipment by a Third Party" for further information regarding certification by a third party.

If there are any questions regarding this policy, call Michelle Wilson at 602-771-4933.