

Stage II Vapor Recovery Decommissioning Rule Workshop

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August 6, 2014

Important Considerations

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

Agenda

- * Background
- * Rulemaking Process
- * Decommissioning and Process Details
- * Next Steps

Background

- * May 2012 - EPA issued final rule that ORVR was in widespread use
- * November 2012 to January 2014 – Three stakeholder meetings held to review options/develop plan
- * Stage II vapor recovery decommissioned between October 1, 2016 and September 30, 2018
- * April 22, 2014 House Bill 2128 passed with an emergency clause
- * State Implementation Plan revision is on schedule for submittal to EPA

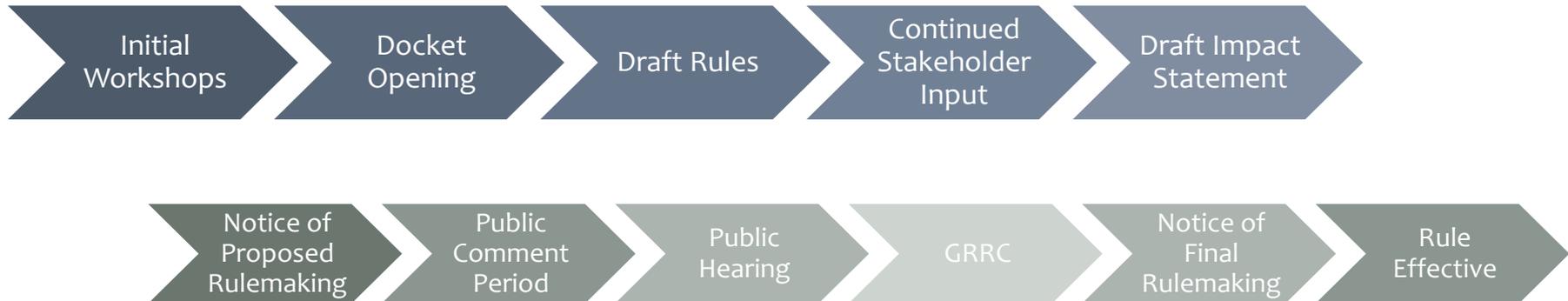
- * More info:
<http://www.azdwm.gov/?q=resource/stage-ii-program-changes>

HB 2128

- * All stage II requirements remain in place until site decommissions
- * New sites exempt from stage II installation
- * Stage I requirements remain in place following decommissioning of stage II
- * Requires AZDWM, in consultation with ADEQ and the Fire Marshal's office to develop rules
- * More information:
http://www.azleg.gov/DocumentsForBill.asp?Bill_Number=2128&Session_Id=112

Rulemaking Timeline

Must be effective prior to October 1, 2016



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

Goals

- * Safe
- * Cost Effective
- * Efficient
- * Protective

Requirements for Decommissioning

- * Adopt Petroleum Equipment Institute (PEI)
Recommended Practice (RP) 300

<http://www.pei.org/PublicationsResources/RecommendedPracticesExams/RP300/tabid/101/Default.aspx>

PEI 300 Requirements

- * 14.1 Introduction
- * 14.2 Nature of the Procedure
- * 14.3 Qualifications
- * 14.4 Paperwork
- * 14.5 Applicability

PEI 300 Requirements, cont...

- * Several slides regarding review of PEI RP 300 requirements were removed from the original presentation due to copyright. These are summarized in the following slides.

PEI 300 Requirements, cont...

- * Initiate Safety procedures
- * Relieve pressure in the tank ullage by removal of the PV Vent Valves

PEI 300 Requirements, cont...

Vapor pots need to be drained:

- * Open, check for presence and pump out any liquid
- * Disconnect copper line at the vacuum port of the submersible pump and seal copper line
- * Install a plug in the submersible pump to seal it, and when feasible seal the copper line inside the vapor pot sump
- * Alternately, remove copper tube completely if it can be done w/o excavation. If applicable, plug opening in containment sump
- * Replace vapor pot cap, sealing so it is vapor tight

PEI 300 Requirements, cont...

For vacuum-assist systems with vapor pumps in each fueling station:

- Open electrical junction box and disconnect wiring at the pump motor. Cap all wires using wire nuts to isolate the wires
- Reprogram the dispenser electronics to disable the vapor pump to indicate stage II is no longer used
- Drain liquid from the vacuum pump by temporarily disconnecting the vacuum tubing at the bottom of the pump or remove the pump
- There is no need to remove the pump if there is no gasoline in it

PEI 300 Requirements, cont...

For centrally-located vapor pumps:

- Completely remove the vacuum-pumping mechanism
- Seal the vapor piping

PEI 300 Requirements, cont...

Isolate the below-grade vapor piping at the base of the dispenser:

- * Disconnect below-grade vapor piping from dispenser at a point that is at or below the base of the dispenser, which may require removal of the vapor shear valve
- * Seal the vapor piping so it is vapor tight

Additional requirement not in PEI RP 300: Purge liquid from piping

PEI 300 Requirements, cont...

- * Disconnect the vapor piping at the tank top if it can be done without excavation
- * Seal both the tank end and dispenser end of the piping
- * Requesting comments on requiring disconnection during future construction if not performed during decommissioning

PEI 300 Requirements, cont...

- * Seal the dispenser cabinet piping

Replace hanging hardware with conventional hanging hardware:

- * Drain product from the hanging hardware into an appropriate container
- * Remove all stage II hanging hardware
- * Use appropriate adaptors as needed to install conventional hanging hardware

PEI 300 Requirements, cont...

- * Replace the PV Vent Valve
- * Remove the Stage II operating decals from dispensers
- * Conduct testing to ensure vapor-tight:
 - * Pressure Decay
 - * TP-96-1 (short test)
 - * Appendix J.5 (long test)
 - * Tie-Tank Test
 - * CARB TP-201.3C
- * Conduct final visual check
- * Complete checklist

Decommissioning Process

- * Notice of Intent to Decommission Stage II Vapor Recovery
 - * Notification 10 days prior to construction start
 - * Includes info anticipated construction days/times, # dispensers, # hoses/nozzles, construction company, vapor testing company
- * Modification of Construction start date
 - * Due 24 hours prior to construction start date for changes
 - * For use to update construction start date

Decommissioning Process, cont.

- * Decommissioning Checklist – to be completed and submitted within 10 days of completion
 - * Includes information regarding specific actions taken when decommissioning
 - * Includes vapor testing to ensure site is vapor tight prior to reopening
- * Annual witnessed test/inspection to be scheduled and performed at a later date
 - * Allows maximum flexibility for scheduling witnessed test

Annual Test For Stage I

- * Pressure Decay
 - * TP-96-1 (short test)
 - * Appendix J.5 (long test)
- * Tie-Tank Test
 - * CARB TP-201.3C
- * PV Vent Valves
 - * TP-201.1E

General Guidelines

- * Must decommission entire station all at one time
- * Site will be shut down during decommissioning
- * Can reopen site following decommissioning and passage of an unwitnessed vapor recovery test performed by an RSR
- * Agency notification for unannounced inspection of decommissioning
- * Witnessed test scheduled and conducted at later time

Decommissioning Criteria

- * Approximately 50% of sites during first year, 50% of sites during second year
 - * EPA air emissions impact based upon this model
 - * Contractor/tester availability to ensure safe decommissioning
 - * Department staffing to verify decommissioning and vapor integrity
- * All sites must be done no later than September 30, 2018

- * Goals:
 - * 1) To prevent situations where sites conduct stage II testing, then remove equipment shortly after
 - * 2) Minimize staffing/scheduling conflicts that would hamper business operations

Decommissioning Timeline

- * Currently all sites have a designated test month in which they perform their vapor recovery test
- * Decommission by BMF# - First in first out
 - * 50% sites 1st year, 50% sites 2nd year, based on BMF
 - * Site must decommission during scheduled test month and conduct final witnessed test during following month

Option 1 Example

BMF # <15100 – Decommission Year 1 (Oct 1, 2016 – Sept 30, 2017)

BMF # =>15100 – Decommission Year 2 (Oct 1, 2017 – Sept 30, 2018)

- * **BMF #2310, current test month November**
 - * **Must decommission Nov 1 – Nov 30, 2016**
 - * **Witnessed vapor test conducted Dec 1 – Dec 31, 2016**

- * **BMF #40535, current test month May**
 - * **Must decommission May 1, 2018 – May 31, 2018**
 - * **Witnessed vapor test conducted June 1, 2018 – June 30, 2018**

Exempt Stations

- * May decommission any time October 1, 2016 to September 30, 2018
- * 6 months after identified

Next Steps

- * Submit comments by Friday, September 5:

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- * Tentative Date for Next Meeting:

Wednesday, October 15