



Compliance Advisory

March 8, 2013

Gasoline Dispensing Facility Compliance Reminder

This Advisory is provided to inform you about Air District activities that may affect your operation. It will help you achieve and maintain compliance with applicable air quality rules and regulations.

ATTENTION: OWNER/OPERATORS OF ABOVEGROUND GASOLINE STORAGE TANKS

SUBJECT: STATE DEADLINE FOR STANDING LOSS CONTROL AND CERTIFICATION OF COMPLIANCE

By **April 1, 2013**, the California Air Resources Board (CARB) requires owners of certain existing Aboveground Storage Tanks (ASTs) in gasoline service to comply with **Standing Loss Control (SLC)** vapor recovery requirements.

SLC systems reduce the creation and release of gasoline vapors by reducing the temperature of stored gasoline by the use of certified protected tanks or applied certified solar reflective paints; and by the use of an approved pressure/vacuum vent valve (P/V valve). Without SLC, natural heating of the tank causes gasoline to volatilize and vent into the atmosphere.

The Air District does not require an Authority to Construct for your SLC upgrade. However, please **complete and submit** the attached **Compliance Certification** when your upgrade has been completed in order for us to document compliance of your equipment.

In this Air District, all ASTs are subject to SLC requirements except the following:

- ASTs with less than **250 gallons** (maximum) gasoline capacity;
- ASTs with less than **550 gallons** gasoline capacity used primarily for fueling implements of husbandry (as defined in California Vehicle Code 36000) with submerged fill pipes;
- ASTs not storing gasoline.

Compliance Requirements for Existing ASTs:

The compliance requirements for existing¹ ASTs and their associated P/V valves are listed in **CARB Executive Order (EO) VR-301^{2,3}**. They include the following:

- **Certified ASTs Not Requiring Painting:** Protected AST models listed in **Section B of Exhibit 1** of the EO still equipped with their original equipment manufacturer (OEM) paint, and the existing OEM paint is in good condition, do not need to be repainted.
- **Tanks Requiring Painting*:** Protected AST models listed in Section B of Exhibit 1 that are not equipped with their OEM paint, or those with their OEM paint that need repainting for aesthetic, maintenance, or other purposes; and, all ASTs not listed in

Section B of Exhibit 1, require painting.

¹ Installed at their current location prior to April 1, 2009.

² EO VR-301 can be viewed at: <http://www.arb.ca.gov/vapor/eos/eo-vr301/eo-vr301.htm>

³ Frequently Asked Questions (FAQs) for SLC can be viewed at: <http://www.arb.ca.gov/vapor/faq.htm>.

- **Certified** protected ASTs, except for Jensen Precast “Armor Cast” AST, can be painted with a coating system listed in EO VR-301 (Section C of Exhibit 1) (all 4 coating systems are VOC compliant in this Air District), or they can use the same coating system applied by the OEM at the production facility if Air District compliant. If the latter option is selected, the AST owner is advised to contact the appropriate AST manufacturer to obtain current specifications of the OEM coating system. Jensen Precast “Armor Cast” AST owners are advised to only follow the manufacturer’s specifications. Additionally, existing Jensen Precast “Armor Cast” AST with exposed aggregate finish should not be painted.
- All other ASTs shall be painted with a coating system listed in EO VR-301.
- **P/V Valve Replacement:** If not already so equipped, ASTs must have their existing PV valves replaced with a **certified Husky Model 5885**, or any other PV valve listed in EO VR-301, Section A of Exhibit 1.

ASTs that include **non-gasoline compartments** (for example, separate diesel and gasoline compartments within the same AST) must be painted in their entirety with an EO certified, and Air District compliant, paint. For those ASTs with inaccessible areas, please contact us for more guidance.

*Note: The repainting of tanks may trigger other environmental regulation(s); for example, water pollution prohibitions. It is the tank owner’s responsibility to comply with all applicable requirements.

Compliance Certification:

Please complete and mail in the attached Compliance Certification Form once your AST(s) is in compliance with the State SLC requirement. The form can also be downloaded from the District website at www.baaqmd.gov/gdf. Mailing instructions can be found on the form.

July 1, 2014 Enhanced Vapor Recovery Phase I Deadline

Owner/Operators will be required to upgrade their ASTs to meet the Enhanced Vapor Recovery (EVR) Phase I system requirements as of July 1, 2014. Certified EVR Phase I controls for ASTs require SLC; and, an Air District Permit will be required for your Phase I upgrade. Stay tuned for future advisories on the EVR Phase I deadline for ASTs.

More information can be obtained from the following sources:

- ☎ For questions regarding this Advisory, contact Peter Nelson, Supervising Air Quality Inspector at pnelson@baaqmd.gov or (415) 749-5097.
- ☎ For Air District permit application forms visit: www.baaqmd.gov/Divisions/Engineering/Application-Forms.aspx, or for AST permit assistance call Mark Tang, Air Quality Technician at: (415) 749-4905.
- ☎ For information about AST SLC requirements from CARB visit: www.arb.ca.gov/vapor/vapor.htm, or contact the CARB Engineering and Certification Branch at: (916) 327-0900.

Wayne Kino
Director of Enforcement



BAY AREA AIR QUALITY MANAGEMENT DISTRICT

**STANDING LOSS CONTROL COMPLIANCE FORM
For Aboveground Storage Tanks That Store Gasoline**

All fields are required unless otherwise noted. Please type or print.

Mail to:
BAAQMD
Compliance & Enforcement - SLC
939 Ellis Street,
San Francisco, CA 94109
or email to: Compliance@baaqmd.gov
Subject: SCL Compliance Form
Tel: (415) 749-4795

- Fill out and submit this form if you have at least one aboveground storage tank (AST) storing gasoline.
- The deadline to comply with standing loss control (SLC) requirements of Executive Order (EO) VR-301 is April 1, 2013.

1. Facility Identification – If you do not have a permit with BAAQMD, skip the field for BAAQMD Plant/Site #.

Facility Name		BAAQMD Plant/Site # (Existing facilities only)	
Equipment Physical Address			
City	State	Zip Code	

The BAAQMD Plant or Site # can be found on the Permit to Operate or on any BAAQMD-issued invoice.

2. Owner Contact Information – The owner is the person responsible for the above facility.

First Name	Last Name	Title	
<input type="checkbox"/> Same as facility physical address			
Contact Address			
City	State	Zip Code	

3. Exemptions – Some or all ASTs may be exempt from SLC requirements.

An AST is exempt from SLC requirements if it meets any of the following:

- Actual tank capacity is less than 250 gallons.
- The AST does not store gasoline.
- For an agricultural AST, the tank's capacity is less than 550 gallons AND equipped with a submerged fill pipe.

Mark which statement applies to you:

- 3A) All ASTs at this facility meet at least one of the exemptions listed above.
 3B) At least one AST does NOT meet an exemption listed above.

If 3A applies to you, skip to Part 7 of this form.

If 3B applies to you, any AST that does not meet an exemption must comply with SLC requirements. Continue to Part 4.

4. AST Information – Complete a section for each AST not exempt from SLC requirements.

If any of the tank information is not available, mark the field "Unknown". If more space is needed, provide additional AST information on a separate sheet of paper.

AST #1

Manufacturer/Make	Model	BAAQMD Source Number (if applicable)
Serial Number	Storage capacity (gallons)	

AST #2

Manufacturer/Make	Model	BAAQMD Source Number (if applicable)
Serial Number	Storage capacity (gallons)	



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AST #3

Manufacturer/Make	Model	BAAQMD Source Number (if applicable)
Serial Number	Storage capacity (gallons)	

AST #4

Manufacturer/Make	Model	BAAQMD Source Number (if applicable)
Serial Number	Storage capacity (gallons)	

AST #5

Manufacturer/Make	Model	BAAQMD Source Number (if applicable)
Serial Number	Storage capacity (gallons)	

5. Painting Requirements

To be in compliance with the painting requirements, all ASTs that must comply with SLC requirements must either:

- Be a protected model listed in Section B of Exhibit 1 of the EO VR-301 and still equipped with their original equipment manufacturer paint in good condition.
- Be painted with certified paint listed in Section C of Exhibit 1 of the EO VR-301 AND that paint must comply with BAAQMD Regulation 8, Rule 3. (See EO VR-301 for complying paints)

Mark which statement applies to you:

- I am currently in compliance with the painting requirements.
- I am currently NOT in compliance with the painting requirements.
- Not applicable.

6. Pressure and Vacuum (P/V) Value Requirements

To meet the P/V value requirements, all ASTs that must comply with SLC requirements must be equipped with a certified Husky Model 5885, or any other PV valve listed in EO VR-301, Section A of Exhibit 1. *The Husky Model 5885 was the only certified P/V valve at the time this form was created.*

Mark which statement applies to you:

- I am currently in compliance with the P/V valve requirements.
- I am currently NOT in compliance with the P/V valve requirements.

7. Certification/Signature of person responsible for the information on this form.

I hereby certify that I am authorized to complete this form for the facility and that all information contained herein is true and correct.

Name	Title	
Signature	Date	Phone (xxx-xxx-xxxx)