



December 9, 2014

Frequently Asked Questions (FAQs) Regarding Aboveground Storage Tank Requirements

The following FAQs are provided to assist operators with existing and new Enhanced Vapor Recovery (EVR) requirements for Aboveground Storage Tanks (ASTs).

1. Do I have to test my AST?

All ASTs (250 gallon capacity or greater) used to store gasoline are required to be tested on a periodic basis. Testing ensures that tanks are maintained in good operating condition and do not leak air contaminants. The required tests are specified in Permit Attachment B, which can be accessed at <http://www.sdapcd.org/comply/vapor/VRattach.html>

2. When am I required to test my AST?

ASTs that are less than or equal to 550 gallons are required to be tested once every two years. ASTs that are greater than 550 gallons are required to be tested annually. Testing is required to be conducted within 45 calendar days prior to the 1st day of the permit month (e.g., if the permit expiration date is 7/31/2015, the required tests must be successfully conducted between 5/15/2015 and 6/30/2015).

3. How do I schedule a test?

You or your contractor must notify the San Diego County Air Pollution Control District (District) at least 15 calendar days prior to testing. Notification forms can be found on the District website at <http://www.sdapcd.org/comply/vapor/VRforms.html>. Notifications can be submitted to the District via fax at (858) 586-2651, an e-mail to Karen Wilkins at Karen.Wilkins@sdcounty.ca.gov, or in writing on an approved District form.

4. Is a pre-test allowed?

You may choose to pre-test your facility prior to the scheduled test date. Pre-testing can be used to identify and correct problems before the scheduled test date. You are not required to notify the District for pre-tests, and results do not have to be submitted or made available for District review.

5. What should I know about gasoline deliveries and fuel levels prior to the scheduled test?

Gasoline deliveries are not allowed within 8 hours prior to conducting TP 96-1 (10" pressure decay test) or 3 hours prior to conducting VR 401/402 Exhibit 4 (2" pressure decay test). The required ullage levels (empty space in the tank) vary based on tank size and test type. The 10" pressure decay test requires a minimum ullage of 300 gallons for tanks less than 1,000 gallons, and tanks 1,000 gallons or greater require a minimum ullage of 15% of the tank capacity. Alternatively, a 2" pressure decay test can be conducted which requires a minimum ullage of 25% of the tank capacity and

maximum ullage of 75% of the tank capacity, regardless of tank size. Failure to meet the above conditions during the day of the scheduled test date may result in a test cancellation. Please see Permit Attachment B for additional information related to pressure decay testing.

6. What if my test is canceled?

Testing not conducted at the scheduled date and time without providing notice to the District at least two working days prior to the scheduled test date, may result in a \$250 test cancellation fee. Additionally, you must submit another test notification to the District at least 15 calendar days prior to the rescheduled test date.

7. Do I have to submit my test results to the District?

Test results must be submitted to the District within 15 calendar days of the test date. Test results can be submitted to the District via fax at (858) 586-2651, an e-mail to Karen Wilkins at Karen.Wilkins@sdcounty.ca.gov, or by mail.

8. What are the AST inspection/recordkeeping requirements?

AST operators or their designee are required to inspect and record their inspections in accordance with Permit Attachment M, 'Inspection, Maintenance and Repair Log for ASTs'. The frequency of these inspections is specified in your Permit to Operate. Attachment M can be accessed at <http://www.sdapcd.org/comply/vapor/VRattach.html>.

9. Can any AST opening or Product Hose Adaptor be used for gasoline deliveries?

Bypassing and using other entry points like the emergency vent opening or the stick gauge port is not allowed. Additionally, an AST operator and/or gasoline cargo truck driver must ensure that a certified product delivery hose adaptor is used during a delivery into an AST with Phase I EVR. The make/model of a certified product adaptor is listed in the applicable Phase I EVR Executive Order for your AST.

10. How can I stay informed?

We recommend that all operators subscribe to the District's and California Air Resources Board's (CARB) e-mail lists, to be notified of recent or proposed changes in vapor recovery requirements. The District's e-mail list can be found at <http://sdapcd.org/index.html> and CARB's at <http://www.arb.ca.gov/vapor/vapor.htm>.

11. Who can I contact if I have a question?

Please contact Tim Wolff, Air Quality Inspector III, at 858-586-2677 or via e-mail at Tim.Wolff@sdcounty.ca.gov.

When required testing is not successfully conducted, the District may take enforcement action including penalties. Penalties are assessed according to the California Health and Safety Code and are designed to deter late testing and take away any economic advantage over other similarly regulated facilities.