Monterey Bay Air Resources District
Serving Monterey, San Benito, and Santa Cruz Counties

24580 Silver Cloud Court
Monterey, CA 93940
PHONE: (831) 647-9411 • FAX: (831) 647-8501

ADVISORY

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To: **Gasoline Dispensing Facility (GDF) Owners/Operators and Vapor Recovery Installation, Repair and Testing Contractors**

RE: **Triennially Performance Testing of TP-201.1E- Leak Rate and Cracking Pressure of Pressure/Vaccum (P/V) Vent Valve at GDF's with 1.2 Million Gallon Throughput**

This advisory applies to GDFs that must comply with Title 40 of the Code of Federal Regulations (CFR) Part 63, Subpart CCCCC- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities [1].

40 CFR Part 63, Subpart CCCCC requires GDFs having a monthly throughput of 100,000 gallons or more to complete testing to demonstrate compliance with the leak rate and cracking pressure requirements as described in the California Air Resources Board Recovery Test Procedure (TP) 201.1E for the P/V Vent Valve [2]. Each owner or operator of a GDF must comply with this requirement at the time of installation and every 3 years thereafter.

Monterey Bay Air Resources District's (MBARD) GDF permits have not specifically required this testing. To ensure compliance with the federal regulation, MBARD will now require P/V Vent Valve testing for GDFs with an **annual throughput of 1.2 million gallons or more**. TP-201.1E will be required as follows:

- ✓ *Triennially starting in **calendar year 2020 and every 3 years thereafter**.Testing should be completed along with the Annual Vapor Recovery Testing. MBARD will accept a test completed prior to 2020 if completed in 2018 or 2019.*
- ✓ *After New P/V Vent Valve Installation*
- ✓ *Permit Modification Start-up Testing*

TP-201.1E required for CALENDAR YEAR 2020 to be completed with Annual Vapor Recovery Testing

DOES MY GDF REQUIRE P/V VENT VALVE TESTING?

If your station has an annual gasoline throughtput of 1.2 million gallons or more, you are required to conduct P/V vent valve testing. A list of GDF's with 1.2 million gallon throughput is located at: https://www.mbard.org/gas-stations-compliance-and-testing.

MBARD recommends the following actions to ensure successful testing of the P/V vent valve during vapor recovery test events:

Access to Remove P/V Vent Valves for Testing: GDF owners/operators and vapor recovery testing contractors are responsible for having appropriate equipment on site to gain access and remove P/V Vent Valve located on top of vent stacks for testing. These valves are located on top of buildings or free standing and can be more than 12 feet off the ground. Any obstructions such as vegetations should be cleared to allow access to valve and to place a ladder or boom lift to operate safely.

Order of Test Procedures: In an effort to avoid duplication of test procedures, vapor recovery testing contractors should conduct TP-201.1E prior to conducting TP-201.3- *Determination of 2 inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities* during vapor recovery test events.

Appropriate Test Apparatus: Testing Contractors are expected to have appropriate test stand and vaccum generating device necessary to conduct test on P/V vent vales per TP-201.1E. Pressure and flow measuring devices shall be calibrated and leak checked in accordance with TP-201.1E prior to conducting the test procedures.

If you have questions, please contact Bronwyn Nielson, Air Quality Compliance Inspector at (831) 647-9418 ext. 216 for more information.

[1] *40 CFR Part 63, Subpart CCCCC can be found on EPA website* at: https://www.ecfr.gov/cgi-bin/text-idx?node=sp40.15.63.ccccc

[2] *Test Procedure (TP) 201.1E for the PV Vent Valve*: https://ww2.arb.ca.gov/our-work/programs/vapor-recovery/vapor-recovery-certification-and-test-procedures