September 28, 2016

To All Service Stations Replacing Gasoline Dispensers and Other Equipment

It has come to our attention that gasoline dispensing facility (GDF) operators are in the process of replacing dispensers to comply with new point of sale card reader security measures. This informational bulletin serves as a reminder that replacement of certain equipment, such as dispensers, may meet the definition of a major modification and trigger the requirement to upgrade certain components of your Phase II vapor recovery systems to the most recent version of their Executive Orders.

Per D-200, “Definitions for Vapor Recovery Procedures,”¹ a major modification is:

“the modification of an existing GDF that makes it subject to the same requirements to which a new installation is subject.”

More specifically, per D-200, actions which trigger a major modification include:

“modification of the Phase II system that involves the addition, replacement or removal of 50 percent or more of the buried vapor piping, or the replacement of dispensers, is considered a major modification of the Phase II system.”

In light of the fact that the definition of major modification does not specify an exact number of dispensers, GDF operators are advised to contact their local Air Pollution Control District or Air Quality Management District (district) for guidance for their replacement and possible permit modification. A list of district contacts responsible for the permitting of gasoline service stations is available at the following website: https://www.arb.ca.gov/vapor/EVRDistrictContacts.pdf. In the case where a point of sale upgrade qualifies as a major modification, the GDF’s Phase II system, including the In-Station Diagnostic (ISD) system, will be upgraded to meet the current Executive Order. In addition to possible hardware replacements, this will most likely lead to ISD software needing to be upgraded to the current version.

If you have questions regarding this bulletin, please contact Ms. Donielle Jackson at (916) 445-9308, or by email at donielle.jackson@arb.ca.gov.

¹ D-200 is available at https://www.arb.ca.gov/testmeth/vol2/currentprocedures.htm.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: http://www.arb.ca.gov.