

Frequently Asked Questions

Decommissioning Stage II Systems

Revised October 28, 2016

1. What is the most recent action that MassDEP has taken regarding Stage II vapor recovery systems?

On January 2, 2015, MassDEP promulgated revisions to its Stage II regulations (310 CMR 7.24(6)) that require decommissioning of Stage II by **January 2, 2017**. These regulations supersede two enforcement discretion directives issued by MassDEP on July 2, 2012 and June 21, 2013.

2. Why is MassDEP requiring Stage II decommissioning?

In May 2012, the U.S. Environmental Protection Agency (EPA) issued a rule allowing states to phase out their Stage II Vapor Recovery programs. EPA's action was based on its determination that onboard refueling vapor recovery (ORVR) systems are in widespread use in the motor vehicle fleet nationwide and Stage II Vapor Recovery systems will not provide air pollution reduction beyond what is provided by ORVR.

MassDEP then conducted an assessment of the costs and benefits of its Stage II and Stage I vapor recovery programs and determined Stage II systems would continue to reduce emissions in Massachusetts through 2015, but that the reductions would not be cost-effective. The evaluation also demonstrated that cost-effective emission reductions can be achieved by enhancements to Stage I systems. Based on this assessment, MassDEP promulgated regulations on January 2, 2015 that require Stage II systems to be decommissioned by January 2, 2017 and also require improvements to Stage I vapor recovery systems.

3. Must single-wall steel underground storage (USTs) tanks equipped with a Stage II vapor recovery system decommission their Stage II system and install applicable Stage I components on or before January 2, 2017?

Since single-walled steel USTs must be removed or closed in place by August 7, 2017 (310 CMR 80.15), owners/operators of single-wall steel USTs equipped with Stage II are not required to decommission their Stage II systems (and install applicable Stage I components) before January 2, 2017. Instead, Stage II systems must be decommissioned at the time the single-wall steel UST is removed or replaced.

4. Can I stop operating and maintaining a Stage II system without decommissioning it?

No. The owner/operator must maintain the Stage II system in accordance with 310 CMR 7.24(6) until the entire Stage II system is decommissioned in accordance with the revised Stage II regulations.

5. Do I have to maintain a Stage I system if I decommission the Stage II system?

Yes. MassDEP promulgated new Stage I regulations (310 CMR 7.24(3)) that require owners/operators of motor vehicle fuel dispensing facilities to phase in California Air Resources Board (CARB) Enhanced Vapor Recovery (EVR) Phase I components or systems. In addition, EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) for GDFs (40 CFR Part

63, Subpart CCCCCC) also require that applicable gasoline dispensing facilities (GDFs) maintain Stage I systems.

6. What are the requirements for decommissioning Stage II systems?

A. To decommission a Stage II system, as stated in the revised Stage II regulations, the owner/operator must do the following:

- The entire Stage II system must be decommissioned in accordance with the Petroleum Equipment Institute's (PEI's) Recommended Practices for Installation and Testing of Vapor-Recovery Systems at Vehicle-Fueling Sites (PEI/RP300-09), Section 14: Decommissioning Stage II Vapor Recovery Piping;
- A copy of PEI's decommissioning guidance is available for purchase from PEI at the following link: <http://www.pei.org/>
- If not already installed, install the following California Air Resources Board Enhanced Vapor Recovery (CARB EVR) equipment at the time of decommissioning:
 - CARB EVR Stage I Pressure Vacuum Vent Valves, and;
 - CARB EVR Stage I rotatable product and vapor adaptors as described in the CARB EVR Stage I Executive Orders.

CARB EVR Executive Orders can be reviewed at the following link:

<http://www.arb.ca.gov/vapor/eo.htm>

Please Note: Facilities with coaxial Stage I systems are not required to install rotatable adaptors at decommissioning. For facilities with aboveground storage tank systems rotatable adaptors are optional.

B. After decommissioning the Stage II system, the following Stage I compliance tests, as applicable, must be performed on the Stage I system and passed before re-commencing operations:

Test Description	Test Method
Pressure Decay (2 inch Test)	CARB TP-201.3
Vapor Tie Test	San Diego APCD TP-96-1, section 5.1.9
Pressure/Vacuum Vent Valve Test	CARB TP-201.1E
Static Torque Rotatable Adaptor Test	CARB TP-201.1B
Leak Rate of Drop Tube/Drain Valve Assembly Test ¹	CARB TP-201.1C
Leak Rate of Drop Tube/Overfill Prevention Device Test ²	CARB TP-201.1D

¹ Applicable to EVR spill buckets installed with drain valves.

² Applicable to EVR spill buckets installed with EVR overfill prevention drop tubes (i.e., ERV drop tubes installed with a "flapper valve" overfill prevention device).

Please note:

- If EVR buckets are installed without drain valves and overfill prevention drop tubes, then neither TP-201.1C or TP-201.1D are required to be performed.
- UST facilities must have an overfill prevention alarm or ball float valve installed if overfill prevention drop tubes are not installed.
- If a facility fails any of the tests cited in the table above, the failed Stage I component must be replaced with a comparable CARB EVR component within 30 days, after which, if the failed Stage I component is not replaced with a comparable CARB EVR component, no further deliveries of motor vehicle fuel may be received by the facility.

Facilities with coaxial Stage I systems can replace coaxial components with pre-EVR coaxial components until the tanks are replaced. Facilities with “slip-on” spill buckets can replace with pre-EVR slip-on spill buckets up until the seven year EVR installation deadline, January 2, 2022.

C. Submit the following to MassDEP:

- A fully completed **Stage II System Decommissioning Notification Form**, signed by the compliance testing company and the Stage I facility responsible official, and
- A fully completed **PEI RP300 Stage II Decommissioning Checklist** signed by the decommissioning contractor and the Stage I facility responsible official.

A copy of the Stage II System Decommissioning Notification Form is posted at the following link:

<http://www.mass.gov/eea/agencies/massdep/air/programs/stage-ii-vapor-recovery.html>

7. Who can decommission a Stage II System?

MassDEP recommends contacting a qualified Stage I/II Installation/Maintenance contractor for decommissioning services.

8. Must I perform Stage II compliance tests and the annual Stage II certification if I plan to decommission?

A facility does not have to perform the Stage II annual compliance testing and certification provided the Stage II system is decommissioned in accordance with the revised Stage II regulations and the Stage II Decommissioning Notification Form is submitted on or before the annual due date of the Stage II compliance certification. However, after the Stage II system has been decommissioned, and before the Stage I system commences operation, the Stage I System must pass applicable post-decommissioning Stage I compliance tests.

9. What are the Stage I requirements for newly installed Gasoline Dispensing Facilities (GDFs) or new Stage I systems?

Newly installed GDFs at locations where motor vehicle fuel has not been previously dispensed, or new Stage I systems at existing facilities, must install a CARB-certified EVR Stage I system or a CARB EVR component system.

A CARB-certified EVR Stage I system is a vapor balance system that includes all the CARB-certified components contained in one of the CARB Executive Orders listed in 310 CMR

7.24(3)(c), Table 1 (underground storage tanks) or Table 2 (aboveground storage tanks). A CARB EVR component systems is a vapor balance system that includes CARB-certified components from any of the CARB Executive Orders listed in 310 CMR 7.24(3)(c), Table 1 or Table 2.

10. Are facilities with Stage I systems subject to an annual compliance fee?

Both Stage I and Stage II systems have the same annual compliance fee of \$245 in MassDEP's fee regulations (310 CMR 4.00). Stage I facilities that were previously exempt from the Stage II Program and associated fee now are subject to the Stage I fee.