Frequently Asked Questions
Stage I Enhanced Vapor Recovery (EVR) Systems

Revised October 1, 2021

1. What is Stage I Vapor Recovery?
   Stage I vapor recovery refers to the vapor control system installed on gasoline storage tanks preventing gasoline vapors from being released to the environment during the transfer of gasoline from a gasoline delivery truck to gasoline storage tanks.

2. What is a Stage I “Pre-EVR” system?
   Stage I Pre-Enhanced Vapor Recovery (“Pre-EVR”) systems refer to an older technology of Stage I systems that were certified by the California Air Resources Board (CARB) from 1976 to 2000.

3. What is a Stage I “EVR” system?
   Stage I Enhanced Vapor Recovery (“EVR”) systems refer to CARB certified Stage I systems that, starting in 2000, meet stricter emission control standards compared to Stage I Pre-EVR systems.

4. Is MassDEP requiring the installation of Stage I EVR systems?
   Yes. On January 2, 2015, MassDEP promulgated revisions to its Stage I regulations (310 CMR 7.24(3)) to require the installation of Stage I EVR systems at gasoline dispensing facilities (GDFs) when a new Stage I system or gasoline storage tank is installed.

   The revised Stage I regulation requires the phased-in upgrade of existing Stage I Pre-EVR systems to Stage I EVR systems by January 2, 2022 (see 5. below). For a description of the 2015 Stage I & II regulation revisions see “Fact Sheet: MassDEP’s Revised Stage I & II Regulations” posted on the MassDEP Stage I & II Vapor Recovery Program website.

   https://www.mass.gov/media/1289266/download/

5. Has the Stage I EVR installation deadline of January 2, 2022 been extended to a later date?
   Yes. Due to supply chain and contractor availability limitations attributable to the Covid-19 pandemic, MassDEP will not enforce the January 2, 2022 deadline. The new deadline is January 2, 2023. For more details on the extended deadline please refer to the October 1, 2021, Stage I Enforcement Discretion Directive posted on the MassDEP Stage I Vapor Recovery website under “News & Updates – Additional Resources.”

   https://www.mass.gov/guides/massdep-stage-i-ii-vapor-recovery-program
6. What are the EVR upgrade requirements applicable to my Stage I Pre-EVR system?

The following GDFs are exempt from installing Stage I EVR until the tanks are replaced

- GDFs with existing gasoline tanks with “coaxial” Stage I systems are not required to upgrade to a Stage I EVR system until the existing gasoline tanks are removed and replaced with new gasoline tanks.

The following GDFs must install Stage I EVR at installation

- GDFs that install new gasoline tanks including aboveground tanks, underground tanks, and mobile refuelers, or replace an existing Pre-EVR Stage I system with a new Stage I system after January 2, 2015 must install a Stage I EVR system.

The following GDFs must upgrade to Stage I EVR by January 2, 2023

- GDFs with existing underground gasoline tanks with “dual-point” Stage I, pre-EVR “screw-on” spill buckets, pre-EVR “screw-on” vapor buckets, or “manhole” vapor buckets must upgrade to Stage I EVR spill and vapor buckets by January 2, 2023.

- GDFs with existing underground gasoline tanks with any combination of screw-on buckets, “slip-on” buckets, and manhole vapor buckets must upgrade the screw-on buckets and manhole buckets to EVR buckets by January 2, 2023.

The remaining slip-on buckets are not required to be upgraded to EVR buckets until the slip-on spill or vapor buckets need to be repaired or replaced, at which time they must be replaced with Stage I EVR spill and vapor buckets.

- GDFs with existing aboveground gasoline tanks or mobile refuelers with dual-point Stage I must upgrade to Stage I EVR by January 2, 2023.

The following GDFs are not required to upgrade to Stage I EVR until after January 2, 2023

- GDFs with existing underground gasoline tanks with “dual-point” Stage I, with both Pre-EVR slip-on spill and vapor buckets, are not required to upgrade to Stage I EVR until the “slip-on” spill or vapor buckets must be repaired or replaced, at which time the slip-on spill buckets shall be replaced with Stage I EVR spill or vapor buckets on a case-by-case basis.

7. How do I determine what kind of Stage I system is installed at my GDF?

To determine if your GDF has a Stage I Pre-EVR system or Stage I EVR system, or a coaxial or dual-point system, you can review your most recently completed Stage I Form A, C, or D2. You may also consult your Stage I testing company or installation contractor.

8. What are the approved Stage I EVR systems that can be installed in Massachusetts?

There are two Stage I EVR systems approved for installation under MassDEP’s Stage I regulations: “Stage I CARB EVR systems”, and “Stage I Component EVR systems”.

- **Stage I CARB EVR System** - a vapor balance system that includes all the approved CARB EVR components listed in one of the CARB EVR Certified Executive Orders listed in 310 CMR 7.24(3)(c), Table 1 (underground storage tanks) or Table 2 (aboveground storage tanks).
• **Stage I Component EVR System** - a vapor balance system that includes CARB EVR components from any of the CARB EVR Certified Executive Orders listed in 310 CMR 7.24(3)(c), Table 1 or Table 2.

9. **If a Stage I Pre-EVR component breaks or fails a Stage I test, do I have to replace the Pre-EVR component with an EVR Component?**

   Yes. If a Stage I Pre-EVR component is non-functioning, broken, or fails a Stage I test, the component must be replaced with an EVR component so that by January 2, 2023 the GDF has a Stage I CARB EVR System or a Stage I Component EVR System.

   There are two exceptions:
   
   • **Pre-EVR “slip-on” spill and vapor buckets** - GDFs with installed Pre-EVR “slip-on” spill and/or vapor buckets may repair or replace such buckets with Pre-EVR “slip-on” spill or vapor buckets until January 2, 2023. After January 2, 2023, only EVR “screw-on” spill and vapor buckets may be installed.
   
   • **Coaxial Stage I systems** - GDFs with coaxial Stage I systems may continue to use and repair/maintain the coaxial system until the tank is replaced, at which point the new tank is required to be equipped with a dual-point Stage I system with either a Stage I CARB EVR System or a Stage I Component EVR System.

10. **Where can I obtain the CARB Stage I EVR Executive Orders?**

    The CARB Stage I (Phase I) EVR Executive Orders for underground tanks and aboveground tanks are available at the following link:

    https://ww2.arb.ca.gov/our-work/programs/vapor-recovery/vapor-recovery-executive-orders

11. **What is required to upgrade an existing Stage I Pre-EVR system to a Stage I EVR system?**

    Consult with your Stage I testing company and Stage I installation contractor to determine the Stage I Pre-EVR components that need to be upgraded to meet the requirements of a Stage I CARB EVR or Component EVR System.

12. **Who can install or upgrade a Stage I Pre-EVR System to a Stage I EVR System?**

    MassDEP recommends contacting a qualified Stage I Installation contractor for Stage I EVR installation services.

13. **When I upgrade to a Stage I EVR system, are Stage I compliance tests required before I commence operation?**

    Yes. When the Stage I installation contractor has finished installing your Stage I EVR system, before commencing operation, a MassDEP registered Stage I testing company must perform all applicable Stage I compliance tests until all tests have passing results.

14. **Does a Stage I certification Form need to be submitted to MassDEP when a Stage I EVR system is installed?**

    Yes. A Stage I Form A must be submitted to MassDEP within 7 business days of performing and passing the post-installation tests. When the Stage I testing company has passed all the applicable Stage I compliance tests, they will complete the testing company section of a Stage I
Form A. The GDF Stage I Responsible Official(s) must then complete the Stage I Form A compliance questions and submit the Stage I Form A to MassDEP by mail or email:

**Mailing Address:**

MassDEP
Stage I Vapor Recovery Program
1 Winter St., 6th floor
Boston, MA 02108.

**Email Address:** felicia.uminski@mass.gov

15. **If I have questions regarding my Stage I system, how do I contact the MassDEP Stage I program?**

The phone number and email address for MassDEP’s Stage I Program are as follows:

Stage I Info Line: 617-556-1035 - Extension 1
Email: aq.stage2@state.ma.us