



# MassDEP

Commonwealth of Massachusetts  
Department of Environmental Protection

## 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., 6<sup>th</sup> floor  
Boston, MA 02108.

**Email Address:** [felicia.uminski@mass.gov](mailto: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](mailto:aq.stage2@state.ma.us)