
CALIFORNIA AIR RESOURCES BOARD EXECUTIVE ORDERS
FOR PHASE I EVR SYSTEMS
TESTING REQUIREMENTS: E85 STORAGE TANKS

EFFECTIVE 01/01/2023

Effective January 1, 2023, the Ventura County Air Pollution Control District will require all operators of E85-equipped Gasoline Dispensing Facilities (GDF) subject to California Air Resources Board (CARB) Executive Orders for Phase I EVR systems to conduct the “Determination of 2 Inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities” test no later than 45 days after initial startup and annually for each E85 storage tank as specified in TP 201.3.

“Static Torque of Rotatable Phase I Adaptors”, “Leak Rate of Drop Tube/Drain Valve Assembly” or “Leak Rate of Drop Tube Overfill Protection Devices and Spill Container Drain Valves”, and “Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valve” tests shall be conducted no later than 45 days after initial startup and at least once every (3) years after startup testing as specified in TP-201.1B, TP-201.1C or 201.1D, and TP-201.1E, respectively.

VCAPCD Rule 70.H.9 states “Tests not specified in this section but specified in the applicable CARB executive order shall be performed as specified in the applicable CARB executive order.”

TP-201.3 will be required to be performed annually in coordination with the facility’s existing gasoline testing anniversary date or within 45 days of commencing operation at a new facility or completing any major modification¹ at an existing permitted facility, but not later than (1) year after the effective date of this advisory.

TP-201.1B, TP-201.1C/D, and TP-201.1E will be required to be performed during the next triennial Phase I EVR testing of the gasoline equipment or within 45 days of commencing operation at a new facility or completing any major modification at an existing permitted facility, but no later than (3) years after the effective date of this advisory.

If you have additional questions regarding GDF testing requirements, please contact Steve Bova, Air Quality Specialist, at 805/303-3705 or email steve@vcapcd.org.

¹Major Modification is defined by the California Air Resources Board as: The modification of an existing GDF that makes it subject to the same requirements to which a new installation is subject. Modification of the Phase I system (PHI) that involves the addition, replacement, or removal of an underground storage tank, or modification that causes the tank top to be unburied, is considered a major modification of the Phase I system.

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 (PHII). The replacement of a dispenser is not a major modification when the replacement is occasioned by end user damage to a dispenser. Phase II system upgrades to make the systems ORVR compatible do not constitute a major modification. Phase II system upgrades to comply with the under-dispenser containment requirement (CCR, Title 23, section 2636(h)(1)) initiated before January 1, 2004, do not constitute a major modification. Modifications to dispensers may require use of unihose configurations as described in CP-201 section 4.10.