



Requirements for Stage I EVR Upgrades on UST Systems

The RI DEM Office of Air Resources (OAR) Air Pollution Control Regulation No. 11, "Petroleum Liquids Marketing and Storage" requires all Gasoline Dispensing Facilities (GDFs) to be equipped with CARB-approved Stage I Enhanced Vapor Recovery (EVR) equipment prior to December 25th, 2020. As the majority of facilities in Rhode Island utilize Underground Storage Tanks (USTs) for the storage of gasoline, RIDEM's UST Management Program is also involved in the replacement and upgrades to UST components to comply with the Stage I EVR upgrade requirement

What UST components must be upgraded ?

Requirements will vary from site to site as each UST system is made up of different components. For specific information on what components need to be upgraded, please review the Office of Air Resources document "Frequently Asked Questions (FAQs): Stage I Enhanced Vapor Recovery (EVR) Systems", available on the OAR website at <http://www.dem.ri.gov/air>. Please note that both the vapor and fill spill containment basins must be Stage I EVR CARB-approved, and the fill is required to be double-walled

Who needs to be notified and involved in Upgrades and Modifications?

Both the Office of Air Resources and the UST Management Program need to be involved and notified of modifications and upgrades related to the Stage I EVR system. This is required because although The Office of Air Resources oversees the Stage I EVR program, the necessary upgrades will require modifications to the UST system, which is regulated by the UST Management Program. While both offices are working together to make this upgrade as easy as possible, it is your responsibility to ensure that you are complying with the regulations and requirements of both programs. In some jurisdictions, local or municipal building permits may also be required

What do I need to do if a UST system needs upgrades to comply with the EVR Stage I Requirements?

In general, modification or replacement of most UST components require submittal of a UST Repair or Modification application and written approval from DEM before work can begin. Specific information can be found on the UST modification fact sheet, available here: <http://www.dem.ri.gov/ust/ustmodfact.pdf>. However, some components are exempt from this requirement, including many Stage I components. Upgrades or replacement of the following components do not require UST Program Pre-Approval or submittal of the Repair or Modification application:

- Spill Containment Basin *
- Drop Tube
- Dispenser hose or nozzles
- Pressure/Vacuum (PV) Valve
- Riser Caps/Covers
- Fill and Vapor Port swivel adapters
- Poppet Valves
- UST Riser (only if performed during spill containment basin replacement)

 **Spill containment basin replacement requires submittal of the "Spill Containment Basin Replacement form" within 14 days**

Spill Containment Basin Replacement and Riser Requirements

If a spill containment basin or UST riser needs to be replaced, the following is required:

- A UST primary wall tightness test must be performed before the tank is put back into service
- The contractor must submit the "Spill Containment Basin Replacement" form, available on our website, along with the UST primary wall tightness test, to DEM within 14 days
- A environmental consultant is required to screen soils using a PID under the following circumstances:
 - Evidence of soil or peastone contamination is observed, including odor and staining
 - The basin failed a tightness test or there is evidence of cracks, holes, excessive corrosion, or other damage

 **IMPORTANT: UST Regulations require spill containment basins on the fill pipe be double-walled!**

If you have questions about upgrades or modification of UST systems, please contact either:
Andrew Hook, andrew.hook@dem.ri.gov, 401-222-2797 ext. 7144 or
Clare O'Connor, clare.oconnor@dem.ri.gov, 401-222-2797 ext. 7121
If you have questions about EVR Requirements or deadlines, please contact:
Brianna Seltzer, brianna.seltzer@dem.ri.gov, 401-222-2808 ext. 2427



Any evidence of a release must be immediately reported to DEM by calling
(401) 222-2797