

Stage II Vapor Recovery Decommissioning Frequently Asked Questions

1. When must decommissioning be completed?

Decommissioning must be completed by December 31, 2016.

2. Where can I find the Illinois EPA's rules regarding the repeal of Stage II gasoline vapor recovery equipment installation requirements and procedures for decommissioning existing Stage II equipment?

The rules can be found at 35 Illinois Administrative Code 218.586. A link to the rules can be found on the Illinois Small Business Environmental Assistance Program site at: www.ildceo.net/enviro.

3. Can I turn off my Stage II equipment prior to decommissioning being completed?

No. The Stage II equipment must stay in operation on the dispensers until decommissioning takes place. The equipment and its components must remain in good working order, with proper maintenance, and stay in service until the day that contractors arrive to decommission the equipment at the site. The Illinois EPA will continue to conduct routine Stage II inspections at GDFs in the Chicago area through 2016 to ensure that, prior to decommissioning; the equipment is operational and properly maintained.

4. Do I need to replace my Stage II equipment or any of the components of the Stage II system if the system needs repair prior to decommissioning?

Existing GDFs with Stage II equipment must maintain and keep their systems operational, including replacing components for maintenance, until the equipment is properly decommissioned. If nozzles, hoses, vacuum-assist pumps, or other components need to be replaced prior to decommissioning your facility, you must use Stage II-compatible parts and accessories that are certified for use with your type of system, as you have in the past, until the contractors perform the decommissioning work.

5. How do I find qualified contractors to perform the decommissioning of the system?

Decommissioning activities may involve one or more contracting companies ("contractors") involving piping work, dispenser work, and pressure decay and tie-tank (tank tightness) testing. The owner or operator of a GDF must find qualified contractors to complete the decommissioning work.

The Piping Contractor and the Dispenser Contractor qualifications:

- valid Office of the Illinois State Fire Marshal "Install/Retrofitting" license number and
- Valid 4-digit Illinois Department of Agriculture Registered Repair company identification number for the 3A Gasoline Pump Meter registration.

A list of "Registered Repair Companies" that have the necessary 3A Gasoline Pump Meter registration can be found on the Illinois Department of Agriculture's website at:

https://www.agr.state.il.us/regulation/inspection/WM_RRP_Comp_Meters.pdf

The Testing Contractor, for the pressure decay and tie-tank tests, qualifications:

- Valid Office of the Illinois State Fire Marshal "Tank Tightness Testing" license number.

A list of contractors with a valid "Install/Retrofitting" license and "Tank Tightness Testing" license, can be found on the Office of the Illinois State Fire Marshal's website at: <http://webapps.sfm.illinois.gov/ustsearch/ContractorSearch.aspx>

(Certain contractors may be licensed or registered with both departments in one, two, or all three of these areas.)

6. Is there any paperwork or forms to complete?

Yes, there are two types of forms that will need to be completed and submitted within defined time periods.

- A **“Notice of Intent to Decommission Stage II Vapor Recovery Equipment”** form is required to be submitted to the Illinois EPA at least 10 days prior to commencing decommissioning. This form will identify the GDF, the owner, operator, and contact persons, the date(s) of the decommissioning work, and each of the appropriate licensed and registered contractors that you are hiring to perform the work.
- A **“Stage II Decommissioning Checklist”** form needs to be submitted within 30 days after the decommissioning work is completed. This form contains the GDF information, a checklist for the contractor(s) to complete, as well as information on and certification of each contractor performing the work in their respective qualified areas.
- A final test result copy for tie-tank and pressure decay tests performed by a qualified testing contractor must be attached to the Stage II Decommissioning Checklist. The GDF owner/operator is responsible for coordinating with the qualified contractors to submit the necessary paperwork to the Illinois EPA. The GDF owner/operator can delegate his/her responsibility to the qualified contractors to handle the paperwork, if he/she wishes to choose that route.

Links to these forms as well as other decommissioning information can be found on the Illinois Small Business Environmental Assistance Program website at: www.ienconnect.com/enviro.

7. What are the required procedures for the contractors to follow while performing the decommissioning work?

Contractors must follow the procedures relating to decommissioning Stage II systems outlined in the Petroleum Equipment Institute’s (PEI) “Recommended Practices for Installation and Testing of Vapor-Recovery Systems at Vehicle-Fueling Sites” (PEI/RP300-09), Section 14.6.

8. When should I schedule the decommissioning work?

Decommissioning must be completed by December 31, 2016. Facilities are encouraged to contact qualified contractors to ensure the necessary work can be completed by the required deadline. .

9. How long should the decommissioning work take?

Information provided by qualified contractors indicates the average amount of time for decommissioning Stage II equipment at the typical GDF is about one day. This is dependent on the size of the GDF, the number of dispensers, and whether any unexpected issues are encountered.

10. Do I need to close my station while the work is taking place?

The contractors will need to ensure that their safety and the safety of your customers are the top priority. At a minimum, certain fuel islands will need to be closed while the work is performed on those dispensers. However, it is likely that you will not be able to sell fuel while the contractors are there. This decision will be up to you and the contractors, but is dependent on several factors, including the configuration of the dispensers, tanks, and Stage II equipment, the size of the facility, and whether customer traffic will impede the contractors’ ability to perform the work.

11. What can I expect during and after the contractors complete the decommissioning work?

The contractors will replace your nozzles, hoses, and other components with “non-Stage II” equipment. In other words, prior to decommissioning, you had to use Stage II-compatible nozzles, hoses, and similar components when keeping up the maintenance on your dispensers, hanging hardware, and the other parts related to the proper functioning of the Stage II system. You will now be utilizing “conventional” components on your dispensers that no longer have to be Stage II compatible. In addition, the dispenser contractor will reprogram your fuel dispensers to the “no Stage II” settings.

12. What should I do if I find that repair proposal to fix additional equipment or issues for Stage II decommissioning was deemed too expensive?

If you find that repair proposals are too costly or do not meet your budget, you have the right to change contractors to meet your budget. You will have to select a qualified contractor from the list provided by the Illinois Office of State Fire Marshal or Illinois Department of Agriculture's Bureau of Weights and Measures.

13. What happens if I cannot meet the deadline of December 31, 2016 to completely decommission Stage II vapor recovery equipment?

A penalty or fine may occur. It is your responsibility to have the equipment completely decommissioned by the end of this calendar year. If this task cannot be accomplished within this timeframe, please contact the Stage II Vapor Recovery Program Coordinator immediately at epa.stage2@illinois.gov.

For questions contact the Illinois EPA at epa.stage2@illinois.gov or contact the Illinois Small Business Environmental Assistance Program at 800-252-3998 or dceo.sbep@illinois.gov. For additional information about Stage II equipment decommissioning requirements visit: www.ildceo.net/enviro.