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INFORMATIONAL BULLETIN

January 28, 2013

To All Service Stations with an Annual Gasoline Throughput of 600,000 Gallons or Less

The purpose of this letter is to remind you that In-Station Diagnostic (ISD) systems are required by State law at service stations with annual gasoline throughput greater than 600,000 gallons. Similar to the “check engine light” on your vehicle, ISD systems continuously monitor the performance of your service station’s vapor recovery system and will alert you when certain equipment failures are detected. Over ten years ago, the California Air Resources Board (ARB) adopted ISD as an important tool in the fight against air pollution. Recently, ARB has become aware that there may be some service stations whose gasoline throughput has fallen below the regulatory threshold and yet are still employing ISD. The benefits of ISD are independent of throughput. However, if in recent years, your annual throughput has dropped below 600,000 gallons and you do not anticipate increased sales in future years, discontinuing the use of ISD may be an option. Please note that before taking any action you must first contact the following regulatory agencies. Any modification to your ISD and associated tank monitoring system without proper permission from these agencies will be subject to enforcement action.

1. Contact your local Air Pollution Control District (district) who will explain the requirements for ISD removal including: acceptable throughput documentation¹, the process for permit modification, and any associated fees. A list of district contacts responsible for the permitting of gasoline service stations is available at the following web site:
<http://www.arb.ca.gov/vapor/EVR%20District%20Contacts%202011.pdf>.
2. Contact your local Certified Unified Program Agency (CUPA) who will explain the process for a permit modification related to your tank monitoring system including any applicable fees. A list of CUPA contacts is available at the following website:
<http://www.calepa.ca.gov/CUPA/Directory/default.aspx>

¹ In California, there are 35 Air Pollution Control Districts, each with their own criteria for determining annual throughput at gasoline dispensing facilities. Contact your local district for further information regarding acceptable forms of documentation.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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Once the regulatory approvals have been obtained, you will need to contact a factory trained service provider to perform the work. Both Veeder-Root and INCON ISD systems are heavily integrated into your existing tank monitoring system. Modifications to the ISD system are not trivial (there is no simple on/off switch) and will require the expertise of a factory trained technician. For sites equipped with the Veeder-Root system, a “cold start” of the tank monitoring system is necessary to accommodate software replacement. A cold start can be disruptive because it results in the temporary loss of tank monitoring system settings and alarm history information that is required to be maintained for regulatory purposes. For sites equipped with the INCON system, a “cold start” of the tank monitoring system may not be required, but ISD hardware, specifically output relays, must be disabled to prevent site shutdown. For information regarding factory trained service providers in your area, contact Veeder-Root ISD System Technical Support at 1-800-323-1799 or INCON ISD System Technical Support at 1-800-984-6266.

Lastly, please be aware that if your annual throughput exceeds 600,000 gallons in the future, re-installation of ISD system will be required which will necessitate another round of permit modifications from the above agencies and a service call to a factory trained technician to re-install ISD hardware and software components. Therefore, the decision to remove ISD must be carefully considered, especially for those service stations that operate near the 600,000 gallon per year threshold.

If you have questions regarding this bulletin, in addition to your local district representative, please contact Lou Dinkler at (916) 327-0900 or by email at ldinkler@arb.ca.gov.