



The State of New Hampshire
Department of Environmental Services

Thomas S. Burack, Commissioner

*Celebrating 25 Years of Protecting
New Hampshire's Environment*



January 24, 2012

N.H. Stage II Vapor Recovery Decommissioning Guidelines

The New Hampshire Code of Administrative Rules Env-Wm 1404 Volatile Organic Compounds (VOCs): Gasoline Dispensing Facilities, Bulk Gasoline Plants, and Cargo Trucks were recently revised. These revisions allow for the decommissioning of stage II vapor recovery systems in New Hampshire effective January 1, 2012. Furthermore, they require that existing stage II vapor recovery systems be decommissioned no later than December 22, 2015.

The following decommissioning procedures are intended to provide general guidance to facility owners and operators. All applicable rules and recommended practices must be followed during actual decommissioning activities. Revisions to Env-Wm 1404.17 relevant to decommissioning of stage II vapor recovery systems may be seen at <http://des.nh.gov/organization/commissioner/legal/rulemaking/documents/env-wm1404.17as-amd.pdf> and the balance of Env-Wm 1404 may be seen at <http://des.nh.gov/organization/commissioner/legal/rules/documents/env-wm1404.pdf> Petroleum Equipment Institute Recommended Practices for Installation and Testing of Vapor-Recovery Systems at Vehicle-Fueling Sites (PEI/RP 300-09) is a copyrighted document. It may be purchased at pei.org or it may be viewed by appointment at the New Hampshire Department of Environmental Services (DES) by calling (603) 271-8876.

DES recommends that an owner/operator conduct some advanced investigation and planning prior to setting a date for decommissioning. For example, the owner should investigate whether or not the stage II piping can be disconnected or plugged at the tank without excavation, and investigate whether or not the stage II piping can be easily terminated below grade at the dispensers without having to disconnect and remove the dispenser cabinets for access. Both of these items could greatly affect the scope, time, and cost of the decommissioning procedures. Please note that stage II piping does not have to be disconnected at the tank for the sake of decommissioning if excavation would be required to do so.

The owner should then ensure that all replacement hanging hardware (dispensing nozzles and hoses), hose attach point adaptors, dispenser reprogramming instructions, and appropriate hardware for capping the stage II vapor return line and in-dispenser cabinet vapor lines are available for decommissioning day. All adaptors and caps must be appropriately threaded or glued pursuant to manufacturer's instruction if applicable, and must provide a vapor tight seal.

Please note that the facility may not be partially decommissioned. The stage II system must remain fully operational or it must be fully decommissioned before the facility can be placed back into service.

Decommissioning procedures are as follows:

1. The owner shall notify DES of the intent to decommission the stage II system on the Stage I/II Gasoline Vapor Recovery Station Notification Form available at http://des.nh.gov/organization/divisions/waste/orcb/ocs/ustp/documents/2003_form.pdf. The owner will then be able to schedule the decommissioning with DES so that a DES inspector can oversee the decommissioning and witness the pressure decay testing pursuant to the requirements of Env-Wm 1404.23(g).
2. Prior to disconnecting or plugging the stage II vapor return piping at the tank, conduct a pressure decay test as specified in Env-Wm 1404.23 and Env-Wm 1404.24 to confirm that the vapor return piping is tight and may be closed in place, or that it is not tight and must be removed and a site assessment performed in accordance with the requirements of Env-Wm 1401.18. A pressure decay test performed up to 30 days prior to the scheduled decommissioning of the stage II equipment is suitable for this purpose. If the stage II vapor return piping will not be disconnected or plugged at the tank, the pressure decay test may be conducted AFTER the stage II system has been otherwise decommissioned pursuant to steps 3.a through 3.g below. Notify DES of any test failure within 24 hours pursuant to the requirements of Env-Wm 1404.23(e)(3).
3. Specific decommissioning steps are listed below. See PEI RP 300-09 Chapter 14 for a complete description of all decommissioning requirements.
 - a. Take all necessary safety precautions applicable to decommissioning procedures.

- b. Relieve tank system pressure by removing the vent cap. Do not relieve system pressure by any other means. Vapors may only be deliberately released at a point at least 12 feet above the ground.
- c. If applicable, remove any liquid from drop-out tanks or condensate traps and isolate with vapor tight caps or remove the fixture.
- d. If equipped with a vacuum assist system: electrically isolate, drain, cap or remove each vacuum pump, and reprogram the dispenser electronics per manufacturer's requirements.
- e. If equipped with a central vacuum system: electrically isolate, drain, remove the vacuum pump, cap the vapor piping, and reprogram or eliminate the electronics per manufacturer's requirements.
- f. Disconnect, blow back any liquid blockages with nitrogen, and cap the stage II vapor return piping at a point below grade at each dispenser connection point.
- g. If accessible without excavation, disconnect and cap the stage II vapor return piping at the tank end or isolate by plugging the line at the extractor fitting.
- h. Conduct a pressure decay test as specified in Env-Wm 1404.23 and Env-Wm 1404.24 to test integrity of caps and verify tightness of remaining system.
- i. Plug or cap any remaining vapor piping in each dispenser cabinet.
- j. Replace all stage II dispenser nozzles and hoses with conventional non-stage II dispenser nozzles and hoses having installed the manufacturer approved adaptor fitting at the dispenser outlet as required to successfully plug any coaxial or two point outlet.
- k. Verify that the pressure/vacuum (PV) vent cap tests are conducted as specified in Env-Wm 1404.24 and reinstall PV vent caps or replace with caps meeting the requirements of Env-Wm 1404.18(b) or Title 40 Part 63 Subpart CCCCC Table 1 accessible via <http://www.epa.gov/ttn/atw/area/gdfb.pdf> (NESHAP).

- I. Remove the DES telephone number for reporting difficulties of stage II equipment from the dispenser cabinets.
 - m. Verify that each step of the decommissioning process has been completed and the UST system has been restored to a safe and operable condition pursuant to Env-Wm 1404, PEI RP 300, and equipment manufacturer's requirements.
 - n. Within 30-days of decommissioning, notify DES in writing of the specific test results, testing data collected, and specific actions conducted to decommission the stage II vapor recovery system pursuant to the requirements of Env-Wm 1404.23(e) and Env-Wm 1404.17(f)(3).
4. If the UST system cannot pass the pressure decay test conducted as specified in Env-Wm 1404.23 and Env-Wm 1404.24 due to leaks in the stage II vapor return piping, then the stage II vapor return piping shall be permanently closed via removal and a site assessment shall be conducted and a closure report submitted to DES pursuant to the requirements of Env-Wm 1401.18.

Following decommissioning of the stage II system, the owner remains obligated to continue periodic pressure decay and PV vent cap testing pursuant to the requirements of Env-Wm 1404.23 and 1404.24, and the monthly and yearly maintenance inspections pursuant to the requirements of Env-Wm 1404.08 and 1404.09.

Please contact me with any questions or concerns regarding decommissioning of stage II vapor recovery systems.

Sincerely,

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