

## Memorandum

**Date:** October 6, 1993

**TO:** Permit Services Staff

**FROM:** Seyed Sadredin  
Director of Permit Services

**SUBJECT:** Applicability of 24,000 gallon Phase II exemption at bulk plants.

Rule 4622, "Transfer of Gasoline into Vehicle Fuel Tanks," requires that Phase II vapor recovery to be installed on all gasoline dispensing systems, unless the aggregate "dispensing facility" throughput is less than or equal to 24,000 gallons per year and 10,000 per month.

For the purposes of identifying the applicability of this exemption to card-lock facilities at bulk plants, only the gasoline pumped into vehicle fuel tanks (i.e., the card-lock throughput) is to be counted towards the 10,000 gallon and 24,000 gallon limits. Gasoline pumped into delivery vessels is not to be included when determining the applicability of this exemption.

C: Mark Boese, Deputy APCO  
Bob Kard, Director of Compliance