



FAQs for Stage I Annual Testing

Q: I know all Stage I annual inspections and testing must be completed by December 31st each year. What are the benefits or disadvantages of deferring this test to later in the year as opposed to maintaining my current schedule?

There is no benefit to postponing Stage I testing (pressure decay, vapor-space tie-in, and pressure/vacuum vent valve tests) until later in the year, only disadvantages, as testers contracted to perform the required tests may be unable to accommodate a gasoline dispensing facility's request for testing due to overwhelming demand as the testing deadline approaches. By performing and passing testing early in the calendar year, there is no chance that you will be in violation for not completing the tests by the end of the calendar year.

Q: Does the Connecticut Department of Energy and Environmental Protection (DEEP) offer extensions beyond December 31st if annual testing is not conducted that calendar year?

No.

Q: What should I do to minimize the potential for receiving a notice of violation and the top things I should do or avoid while I continue testing?

Continue to comply with all of the record keeping, monitoring, and testing obligations as required by the Stage I vapor recovery regulation, [Section 22a-174-30a](#) of the Regulations of Connecticut State Agencies. Complete the tests in accordance with state, federal and CARB (California Air Resources Board) requirements, maintain all systems in proper working order, do not bypass or disable any device which controls emissions or monitors storage tank activity, and comply with any applicable federal regulations.

Q: Prior to performing the annual Stage I vapor recovery test, the storage tank(s) must be filled with enough product and corresponding ullage, in order for the test to be accurate. I am having difficulty obtaining enough product to fill the tank(s). Can I defer performing the annual test until the tank(s) are full?

There is no requirement in the regulation for the tank(s) to be full or for the gasoline dispensing facility to receive a full load of gasoline. However, there is a maximum total ullage of 25,000 gallons for all manifolded tanks, and each individual tank must have a minimum ullage of 1,000 gallons or 25% of the tank capacity, whichever is less.

Q: Where can I find the official regulations pertaining to Stage I vapor recovery testing?

Regulations pertaining to Stage I vapor recovery testing are listed under Section 22a-174-30a of the Regulations of Connecticut State agencies and can be found here: [RCSA 22a-174-30a](#).

Q: Multiple employees from DEEP have contacted me about environmental issues. I thought one DEEP Bureau handles all enforcement at gasoline dispensing facilities.

No. DEEP has many Bureaus and Divisions that enforce regulations for different environmental areas. For example, gasoline dispensing facilities may be contacted by the Emergency Response and Spill Prevention Division, Bureau of Water Protection and Land Reuse, or Bureau of Air Management.

Q: I have questions about using the ezFile system and/or questions about my storage tank(s). Who should I call?

For questions or assistance regarding ezFile, please contact the DEEP Licensing and Enforcement Unit at 860-424-3374 or e-mail deep.USTEnforcement@ct.gov.

For questions regarding storage tanks, please contact the Staff Person of the Day at 860-424-3374 or visit [Underground Storage Tanks \(ct.gov\)](#) for more information.