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May 15, 2007

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Dr. Robert F. Sawyer, Chairman
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento CA 95812

**Re: Proposed Regulations for the Certification and Testing of
Gasoline Vapor Recovery Systems Using Aboveground Storage Tanks**

Dear Dr. Sawyer:

The California Air Pollution Control Officers Association (CAPCOA) supports ARB staff's Proposed Regulations for the Certification and Testing of Gasoline Vapor Recovery Systems Using Aboveground Storage Tanks.

This regulation for Enhanced Vapor Recovery (EVR) on aboveground storage tanks is based on readily available, proven technologies, and it complements the existing EVR regulation for underground storage tanks. It will significantly improve equipment performance and reliability, further reducing emissions of smog-forming volatile organic compounds from gasoline dispensing facilities. The CAPCOA Vapor Recovery Subcommittee has been working with CARB staff on this regulation since 2001, and we appreciate the openness and cooperation that CARB staff has shown working with the Subcommittee and other stakeholders in developing this regulation.

If you have any questions or would like to discuss this further, please call me at (805) 781-5912.

Sincerely,

Larry R. Allen
President