July 28, 2011

Clerk of the Board,
Air Resources Board
1001 I Street,
Sacramento, CA 95814

Clerk of the Board,

In response to the NOTICE OF PUBLIC COMMENT PERIOD ON THE PROPOSED AMENDMENTS TO THE LIST OF EQUIPMENT DEFECTS THAT SUBSTANTIALLY IMPAIR THE EFFECTIVENESS OF GASOLINE VAPOR RECOVERY SYSTEM, Date: June 7, 1011, the attached comments are submitted to your office.

Regards,

John Fecteau
Program Manager
Veeder-Root
125 Powder Forest Drive
Simsbury, CT 06070
(860) 651 2882

cc:
Kent Reid, VR
Steve McSpadden, V-R
Kristine Andersen, V-R

Attachment:
CARB ISOR Comments

Comments regarding the CARB STAFF REPORT: INITIAL STATEMENT OF REASONS FOR PROPOSED AMENDMENTS TO THE LIST OF EQUIPMENT DEFECTS THAT SUBSTANTIALLY IMPAIR THE EFFECTIVENESS OF GASOLINE VAPOR RECOVERY SYSTEMS, Date of Release: June 15, 2011.

Appendix 2: Vapor Recover Equipment Defects List (Page 17 of 20)
VR-203 series VST Phase II EVR System not including ISD

equipment	defect	verification procedure
(f) vapor polisher	(1) unit inoperative*[1,2]	direct observation[3]
	(2) ball valves are not in the proper operating configuration as shown in Figure in Exhibit 2*[1,4]	direct observation / shown in VR-203 Exhibit 2 – System Specifications
	(3) unit is not on or in the automatic vapor processor mode*[1,4]	diagnostic section of the Pressure Measurement/Management Control of IOM

* When the identified defect is detected in the listed equipment, the defect determination applies to all affected interrelated systems (which may include all systems at the motor vehicle fueling operation).[5]

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* When the identified defect is detected in the listed equipment, the defect determination applies to all affected interrelated systems (which may include all systems at the motor vehicle fueling operation).[5]

Veeder-Root Comments

[1] According to the ISOR, ARB staff is amending the VRED list with vapor recovery equipment components that meet the following criteria:

1. The defect did not exist when the system was certified;
2. The excess emission associated with the defect have the potential to degrade fueling point or system efficiency by at least five percent; and
3. A field verification procedure exists to identify the defect.

There are no documented vapor polisher defects that result in emission. Without the data to support adding these defects to the VRED list Veeder-Root request that this defect be removed from the VRED and not be included in the Executive Order.

[2] This defect is not included in EO VR203 nor VR204 Section 2, Vapor Recover Defects for System with Veeder-Root Vapor Polisher. Like the Healy CAS, the polisher is a passive device that can appear inoperative during normal operation. Veeder-Root request that the defect be removed.

[3]There is no direct observation validation procedure defined in the EO for an inoperative unit. The vapor polisher is a passive device that appears inoperative. Veeder-Root request that the defect and verification procedure be removed.

[4]The EO includes an exception for maintenance and testing. Veeder-Root requests as similar exception for maintenance and testing.

[5] Overpressure is managed primarily by the fueling of ORVR vehicles. During gasoline dispensing operation the vapor polisher is not used and is not required for system efficiency. The vapor polisher is a secondary pressure management device designed to operate when there is no dispensing at the nozzles. If vapor polisher defects are applied to all affected interrelated systems it will disable both primary and secondary pressure management systems increasing the risk of emission. Veeder-Root strongly recommends that vapor polisher defects not be applied to all affected interrelated systems.