Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman
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Winston H. Hickox
Agency Secretary

Gray Davis
Governor

August 2, 2001

Dear Manufacturer/Stakeholder:

The California Air Resources Board (CARB) has been working with manufacturers, cargo tank companies, and oil companies in an effort to investigate the potential use of rotatable elbows used on cargo tanks as part of the Enhanced Vapor Recovery certification program. At present, we have tested and certified rotatable adaptors used on service stations and have not tested any rotatable elbows at this time.

Our main concern with rotatable elbows is enforceability. Currently designed elbows can be used interchangeably on either rotating or non-rotating type adaptors. Therefore, there is no assurance that a facility with standard adaptors will receive deliveries only from cargo tanks equipped with rotating elbows. To ensure that only rotating elbows are used on facilities with non-rotating (standard) adaptors, we are seeking design suggestions for a specific adaptor/elbow configuration that could be used. Ideally, the rotating elbows could continue to be used on currently certified products (i.e., "swivel" adaptors and standard adaptors). We would like to avoid a configuration in which a standard elbow (non-rotating) is used with a non-rotating adaptor. Ultimately, we would like to standardize the accepted solution.

Your written comments or suggestions relating to a specially designed adaptor or elbow would be greatly appreciated by no later than September 1, 2001. At that time, we will consider each of the various suggestions. We will also provide an opportunity for each stakeholder to comment on the accepted CARB solution prior to adopting new standards.

Should you have any questions relating to the enforceability of rotatable elbows used on cargo tanks, please feel free contact Joseph Fischer at (916) 322-8914 or email at jofische@arb.ca.gov or Laura McKinney at (916) 327-0900 or email at lmckinne@arb.ca.gov.

Sincerely,

George Lew

George Lew, Chief
Engineering and Certification Branch
Monitoring and Laboratory Division

cc: Rosa Salcedo, San Diego County APCD

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: http://www.arb.ca.gov.

California Environmental Protection Agency

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