



# Advisory

To: CAPCOA, Vapor Recovery  
Sub-Committee and Air  
Districts in California.

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## UNCERTIFIED VST BREAKAWAYS IN CALIFORNIA

The widespread installation and use of illegally rebuilt and repaired (uncertified) Vapor Systems Technologies, Inc. (VST) breakaways<sup>1</sup> (VST Breakaways) pose a potential health and safety concern to the Public, as well as potential leak source at gas stations. We request your Air District's help to eliminate these uncertified components.

The rebuilding or repair of a VST Breakaway, labeled 'NON-REATTACHABLE', Model No. VSTA-EVR-SBK (or VSTA-EVR SBK (Rebuilt)), not certified by the Air Resources Board, is considered the manufacturing of an uncertified part. Title 17, California code of Regulations, Section 94011 and the California Health and Safety Code, Division 26, part 4, Chapter 3, Article 5, Section 41954(f)(i), 41955-41957, and 419603.2(b) states that "No person shall sell, offer for sale, or install any new or rebuilt gasoline vapor control system, or any component of the system, unless the system or component has been certified by the state board and is clearly identified by a permanent identification of the certified manufacturer or rebuilder."

Of special concern is the use of materials to replace the shear ring, following the separation of a VST, 'Non-Reattachable' breakaway. This replacement changes the characteristics and makeup of the originally certified breakaway such that separation in a driveoff may be compromised. Additionally, the integrity of the internal seals and machined surfaces may become compromised following a separation event. Rebuilding a VST 'Non-Reattachable' breakaway without State certification constitutes the manufacturing of a new part. That part has not been approved by the Air Resources Board, Cal-OSHA or State Fire Marshal prior to its sale and/or installation and presents a health and safety concern.

Air District inspectors can identify these uncertified breakaways via the following possible indicators:

1. For Original VST breakaways, labeled 'Non-Reattachable' & 'Model No. VSTA-EVR-SBK' (VST Catalog number VST-EVR-SBK), and equipped with an unmarked black cover band at the connection:
  - a. Missing or incorrect black cover band around the connection
  - b. Different color shear ring or shape of the shear ring (should be uniform and brass in color, not copper or silver); see attached color picture
  - c. Any gap or separation of the breakaway halves (upper and lower units) while the breakaway is hanging in application
  - d. Impact markings on the lower half of the breakaway where it contacted the ground, dispenser, vehicle, or other hard surface during a separation event, other than marks that resulted from rubbing against the dispenser.
2. For VST Factory Rebuilt breakaways, equipped with a 'VST REBUILT' marked black cover band at the connection and also labeled 'Non-Reattachable' & 'Model No. VSTA-EVR-SBK' (VST Catalog number VST-EVR-SBKR):
  - a. Missing or incorrect black cover band around the connection
  - b. Different color shear ring or shape of the shear ring (should be uniform and brass in color, not copper or silver) ; see attached color picture

<sup>1</sup> A breakaway is a vapor recovery component mounted between the fuel dispenser and nozzle designed to break apart at a set separation force when a vehicle drives off with the nozzle wedged in its fuel pipe.

- c. Any gap or separation of the breakaway halves (upper and lower units) while the breakaway is hanging in application

**\*\*Note:** Any Breakaway with the black band labeled "VST REBUILT", should be considered factory rebuilt or Certified, unless it has the incorrect shear ring or separation. Impact markings alone, on a "VST Rebuilt" breakaway, is not sufficient for identification.

If any uncertified VST breakaway is found within your Air District, we ask that you take enforcement action according to the regulations and rules established by the state and your Air District. Issue an NOV and lockout/tagout the uncertified component(s), or take the appropriate enforcement action for your Air District; request the maintenance records including invoices for repairs related to any drive-off incidents and any breakaway-related maintenance.

The Air Resources Board's Enforcement group will be taking the appropriate actions. If you encounter uncertified VST breakaways contact Brad Shaw at the following:

Brad Shaw at (916) 323-8410, or email [bshaw@arb.ca.gov](mailto:bshaw@arb.ca.gov).

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