

## **Comment 1 for Gasoline Vapor Recovery Systems (vrdef11) - 45 Day.**

First Name: randy

Last Name: smith

Email Address: randy.smith@sdcounty.ca.gov

Affiliation: San Diego APCD

Subject: T 17 Request for Change

Comment:

Hi Ranjit,

Please consider this as a CAPCOA comment requesting a change in T17 as part of the regulatory review in response to ongoing discussions with ARB on EO 203/204-K (comment #23). Specifically, there is a reference in the EO to GDF-09 that should be amended or the test procedure itself should be revised. I don't believe GDF-09 is current in that it references pre-EVR nozzles (the Emco Wheaton referenced in the EO is EVR) and includes a wet test that is not necessary based on the design of the nozzle and statements made from the manufacturer during recent training sessions attend by SD Staff. George Lew believes it would be easier to change the TP rather than the EO and suggested I send you this request. There is a veiled reference to nozzles not cited in section 5.1 of the TP but even that section does not clearly or adequately address the issue in a reasonable manner considering the design of the insertion interlock nor would it be practical for station operators or district staff to perform. Please feel free to contact me should you have any questions or assistance in revising the TP. Thanks!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-06-21 15:30:40

No Duplicates.

## **Comment 2 for Gasoline Vapor Recovery Systems (vrdef11) - 45 Day.**

First Name: John  
Last Name: Fecteau  
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Affiliation: Veeder-Root

Subject: VRED List Comments  
Comment:

Please see attached file.  
Copy of letter and comments also sent by post.

Attachment: [www.arb.ca.gov/lists/vrdef11/6-vred\\_comments\\_vr.pdf](http://www.arb.ca.gov/lists/vrdef11/6-vred_comments_vr.pdf)

Original File Name: VRED Comments VR.pdf

Date and Time Comment Was Submitted: 2011-07-29 11:00:46

No Duplicates.

**There are no comments posted to Gasoline Vapor Recovery Systems (vrdef11) that were presented during the Board Hearing at this time.**