

## **Comment 1 for Amendments to Enhanced Vapor Recovery Regulations for Gasoline Dispensing Facilities (evr2020) - 45 Day.**

First Name: Burke

Last Name: Albelda

Email Address: bdalbelda@speedway.com

Affiliation:

Subject: Test Procedures for Remote Fill Phase I Systems

Comment:

I would ask that an additional evaluation be conducted prior to adopting procedures for Remote Fill Phase 1 System Configurations specifically, test procedures TP-201.1C and TP-201.1D. The allotted time-to-pressurize specified at five minutes in the testing procedures, for offset piping lengths less than 50 feet, is insufficient to meet the requirement to pass the test. Five minutes may be enough to pressurize the length of a vertical drop tube however, when the remote fill pipe lengths exceed that these procedures do not accommodate for the additional volume in the fuel delivery pathway. I would request that additional testing by Air Resources Board, at gasoline dispensing facilities with remote fills, be conducted to aid in the drafting of a table in the amendment that accurately reflects actual time-to-pressurize in offset fuel delivery pathways shorter than 50 feet.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2020-12-04 13:56:05

No Duplicates.

## **Comment 2 for Amendments to Enhanced Vapor Recovery Regulations for Gasoline Dispensing Facilities (evr2020) - 45 Day.**

First Name: Ted  
Last Name: Tiberi  
Email Address: ttiberi@aridtech.com  
Affiliation: ARID Technologies, Inc.

Subject: ARID Comments for evr2020  
Comment:

Dear Sir or Madam,  
Please accept the attached files representing ARID's Comments for the "Public Hearing to Consider Proposed Amendments to Enhanced Vapor Recovery Regulations" scheduled for 10 December 2020. Please confirm receipt of our comments at ttiberi@aridtech.com, and please also advise if you experience any problems with opening any of the attached files; the files include  
ARB and ARID email\_29 APR\_14 MAY 2020  
ARID Comments on Proposed Amendments to EVR Regulations 14 May 2020  
ARID-Columbia-Hopkins Article  
Description of Spreadsheet Entries and Rationale updated 13 May 2020  
Vent and Fugitive vs Refueling Emissions with ORVR detail....  
Phone Conference with George Lew and Lou Dinkler on Monday 20 April 2020  
ARID Comments for Public Hearing evr2020\_7 DEC 2020

Sincerely, Ted Tiberi, President & Founder, ARID Technologies, Inc.

Attachment: 'www.arb.ca.gov/lists/com-attach/2-evr2020-VzZRJQRsAzQDWghr.zip'

Original File Name: ARID Comments for Public Hearing evr2020\_ 7 DEC 2020.zip

Date and Time Comment Was Submitted: 2020-12-07 10:22:48

No Duplicates.

**Comment 1 for Amendments to Enhanced Vapor Recovery Regulations for Gasoline Dispensing Facilities (evr2020). (At Hearing)**

First Name: Ted

Last Name: Tiberi

Email Address: ttiberi@ARIDtech.com

Affiliation: ARID Technologies, Inc.

Subject: ARID PowerPoint Presentation during 10 Dec Board Meeting

Comment:

I have attached my PowerPoint presentation to guide my testimony during the Public Hearing today. The storage tank schematics allow me to describe the evaporative loss dynamics more effectively than simply discussing verbally.

regards, Ted Tiberi, ARID Tech

Attachment: [www.arb.ca.gov/lists/com-attach/3-evr2020-UGECNARaAzQGZQlq.pptx](http://www.arb.ca.gov/lists/com-attach/3-evr2020-UGECNARaAzQGZQlq.pptx)

Original File Name: 10 DEC 2020 Public Hearing ARID Comments T Tiberi.pptx

Date and Time Comment Was Submitted: 2020-12-10 08:43:55

No Duplicates.

**Comment 2 for Amendments to Enhanced Vapor Recovery Regulations for Gasoline Dispensing Facilities (evr2020). (At Hearing)**

First Name: Tung

Last Name: Le

Email Address: Non-web submitted comment

Affiliation: CAPCOA

Subject: Comments on Item 20-13-3

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/69-hfc2020-AWJUMwNyAzNQOQNi.pdf](http://www.arb.ca.gov/lists/com-attach/69-hfc2020-AWJUMwNyAzNQOQNi.pdf)

Original File Name: capcoa.pdf

Date and Time Comment Was Submitted: 2020-12-10 12:41:05

No Duplicates.