



South Coast Air Quality Management District

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*Office of the Executive Officer
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July 23, 2013

Mr. Richard Corey
Executive Officer
California Air Resources Board
1001 I Street,
Sacramento, California 95814

Dear Mr. Corey,

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to submit comments on the proposed amendments to certification and test procedures for Vapor Recovery Systems at Gasoline Dispensing Facilities (GDFs) and cargo tanks. Specifically, this submittal addresses the proposal to amend test procedures as specified under TP-201.1 – Volumetric Efficiency for Phase I Vapor Recovery Systems. SCAQMD staff requests the Air Resources Board (ARB) to delay adoption of the proposed amendment and direct staff to work with local air districts to develop an alternative protocol that will exclude the bias that can be experienced when testing single-walled aboveground storage tanks (ASTs).

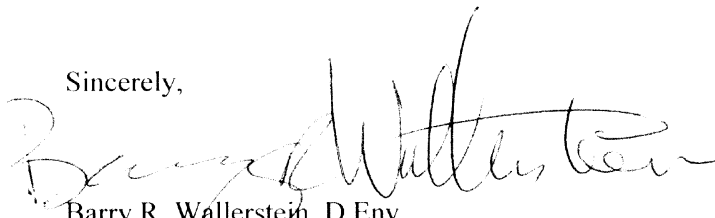
As required by CP-206 - Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities Using Aboveground Storage Tanks, Phase I Enhanced Vapor Recovery (EVR) systems must achieve a minimum volumetric control efficiency of 98 percent as determined by TP-201.1. Based on information provided in the ARB report, about 5,000 single-walled ASTs will need to be retrofitted with Phase I EVR system. This represents 70 percent (5000/7150) of all the AST that will need to be retrofitted. Any changes in the testing method that could result in inaccurate results in TP-201.1 method will directly impact the control efficiency of certified system installed on these single walled ASTs, and will in turn result in emission increases due to lower achieved efficiencies.

Under the current test method, vapor displacements from an AST are measured at the two possible venting routes—vapor return line to the delivery truck and the pressure relieve valve installed in the vent line of the AST throughout the delivery process and after the delivery process has ended until no more venting occurs. The purpose for measuring any vented volume after delivery has ended is to capture all venting due to any pressure build up within the storage tank. The proposed amendment seeks to stop the measurement right after the delivery process has ended. Doing so would ignore any pressure built-up in the storage tank due to the delivery and would almost always guarantee a passing certification test. A better approach can be to add to the current procedures ways to measure other vented volume that would otherwise occur separate from the fuel delivery process. At the time of evaluation, the extra vented volume can then be discounted to determine the full impact of the delivery process and the actual volumetric efficiency of the system being tested.

SCAQMD staff has already been in discussions with ARB staff to investigate and develop appropriate procedures to further refine an alternative proposal. SCAQMD staff is prepared to assist ARB staff in further development of an alternative proposal.

Thank you for the opportunity to help improve certification protocols for vapor recovery systems. Please contact Mr. Mohsen Nazemi, Deputy Executive Officer at (909) 396-2662 or Mr. Danny Luong, Senior Enforcement Manager, at (909) 396-2622, if you need additional information or have further questions.

Sincerely,



Barry R. Wallerstein, D.Env.
Executive Officer

cc: Members of the Board