



California Independent Oil Marketers Association

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Honorable Mary Nichols
California Air Resource Board
1001 I Street
Sacramento, CA 95812

Re: Submission of the 2013 Amendments to the Cargo Tank Vapor Recovery Regulation into the California State Implementation Plan

The California Independent Oil Marketers Association (CIOMA) represents about 300 members, including nearly 90% of all the independent petroleum marketers in the state and about one quarter of the state's 12,000 service stations. Our members are small, family- and minority-owned businesses that provide services to nearly every family in California. Additionally, CIOMA members fuel local governments, law enforcement, city and county fire departments, ambulances/emergency vehicles, school district bus fleets, construction firms, marinas, public and private transit companies, hospital emergency generators, trucking fleets, independent fuel retailers (small chains and mom-and-pop gas stations) and California agriculture, among many others. CIOMA appreciates the opportunity to provide comment on this rulemaking and hopes the California Air Resources Board will work to ensure the health and safety of all Californians with regards to vapor recovery on cargo tank equipment.

CIOMA's concern with adding the Cargo Tank Vapor Recovery regulations to the State Implementation Plan (SIP) is the likelihood that sweeping change could occur with little focus on this program due to overshadowing by higher level issues under the SIP. CARB staff does excellent work on all programs but with so many moving parts involving larger programs, the Cargo Tank Vapor Recovery could merely be touched on, rather than delved into at a meeting addressing changes to the hundreds of pages that make up the SIP.

CIOMA is in a unique position to provide real life experience and input on any proposed changes to the Cargo Tank Vapor Recovery regulations. If CARB is interested in making any changes to these regulations, it would behoove them to contact CIOMA prior to beginning the rulemaking process. Our members interact with this equipment every day at a variety of locations including at the terminal, retail stations, and farms. Being able to provide information regarding the daily use of this equipment is paramount when the agency is contemplating new or revised rules. Our organization has an excellent working relationship with other agencies that may be involved, such as the Division of Measurement Standards, and is available as a resource to CARB and other agencies.

Thank you for your time and consideration, please contact Sam Bayless at bayless@cioma.com with any questions or comments. We look forward to hearing from staff if any changes to the regulation are being considered.