

Subject: Re: Proposed Amendments to CP-201
From: Ted Tiberi <ttiberi@aridtech.com>
Date: 29-Apr-20, 7:56 AM
To: "Lew, George@ARB" <george.lew@arb.ca.gov>
CC: "Dinkler, Louis@ARB" <louis.dinkler@arb.ca.gov>

Dear George, Dear Lou,

I wanted to provide a brief summary of our call from 20 April as well as comments after my review of the CP-201 Preliminary Draft Amendments.

As you know, I have previously submitted also two spreadsheets which quantify environmental and economic impacts of the vent and fugitive emissions.

I look forward to your confirmation that the attached summary accurately reflects the topics that we discussed and the proposed CARB amendments to CP-201.

I await additional information from the upcoming Workshop scheduled for 5 May 2020.

best regards, Ted

ps George, you mentioned during our call that you would provide me with contact person within CARB working on fuel station related issues; can you please forward this info?

Ted Tiberi
ARID Technologies, Inc.
323 S. Hale Street
Wheaton, IL 60187 USA
Phone: 630-681-8500; Mobile: 708-557-0297
email: ttiberi@aridtech.com
Web: www.ARIDtech.com

On 22-Apr-20 4:06 AM, Lew, George@ARB wrote:

Hi Ted,

It was nice talking to you on Monday where Lou and I gave you a briefing of this year's vapor recovery rulemaking. You wanted to know the number of drops associated with the proposed spillage standard. Please see the attachment that lists the conversion factors in the conversion to drops. This table also compares the number of drops of the current standards and the proposed standard. Let me know if you have questions regarding the calculations. -George

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—Attachments: Phone Conference with George Lew and Lou Dinkler on Monday 20 April 2020.pdf 174 KB

Subject: RE: Proposed Amendments to CP-201
From: "Dinkler, Louis@ARB" <louis.dinkler@arb.ca.gov>
Date: 14-May-20, 8:23 PM
To: Ted Tiberi <ttiberi@aridtech.com>
CC: "Lew, George@ARB" <george.lew@arb.ca.gov>, "Wood, Michelle@ARB" <Michelle.Wood@arb.ca.gov>, "Marconi, John@ARB" <john.marconi@arb.ca.gov>

Hi Ted,

I wanted to acknowledge receipt of your email and the four attachments. On behalf of CARB's vapor recovery program, we appreciate the well-articulated comments and detailed emission reduction/cost effectiveness calculations associated with the installation of the ARID Permeator processor.

I also wanted to take this opportunity to confirm receipt of the questions submitted via the webinar during last week's public workshop (May 5th) when John Marconi presented the EVR regulatory proposal. We captured two questions from you as follows:

1. Question: 95% of alarms are not indicating equipment defects; so is this an indication of a fundamental design problem of the ARB certified systems?
2. Question: For Phase II and ORVR emission reductions noted towards the beginning of your presentation, what is the cost per pound of emissions reduced?

In addition, my colleague Mary Beth Schwehr forwarded your comments resulting from their April 30 AB2588 webinar. There are two documents we received from Beth. The first was dated May 4, 2020 entitled "Comments to Webinar Conducted Thursday 30 April 2020". The second was a scientific paper entitled "Vent pipe emissions from storage tanks at gas stations: Implications for setback distances".

Lastly, during our conference call back on April 20, there were a few action items for CARB to follow-up on, mainly to provide ARID with CARB's statewide pressure driven emission calculations and a technical support document pertaining to balance system pressure driven emissions, volume dispensed at pressure and revers idle flow emissions. Please stay tuned for these, both are currently under upper management review.

As indicated in the May 5 workshop, in addition to the ISD overpressure alarm issue, our EVR rulemaking proposal contains several other components including changes to nozzle spillage, amendment of Phase I test procedures to accommodate remote fill configurations, and numerous administrative changes to improve clarity and consistency of certification procedures. As such, we've been juggling multiple tasks so please be patient with us.

Of course, our number one priority is the ISD overpressure alarm issue so here's what I propose in terms of next steps with your comments.

First, we will need some time to compile and consider your comments contained in your latest email along with those submitted to Beth dated May 4, 2020 entitled "Comments to Webinar Conducted Thursday 30 April 2020".

Second, once we carefully consider your comments, we will reach out and schedule a conference call and webinar for further discussion. Given the amount of material, this could be a two-part process, meaning we might need to have a technical call to discuss emission and cost effectiveness calculations and a second more policy related call to discuss the alternative you suggest to consider site specific operating parameters for controlling pressure driven emissions.

How does this sound to you? Overall, you've provide a good deal of information for us to consider, you are definitely keep us on our toes!

Regards,
-Lou

From: Ted Tiberi [mailto:ttiberi@aridtech.com]
Sent: Thursday, May 14, 2020 6:02 AM
To: Dinkler, Louis@ARB <louis.dinkler@arb.ca.gov>
Cc: Lew, George@ARB <george.lew@arb.ca.gov>; Wood, Michelle@ARB <Michelle.Wood@arb.ca.gov>
Subject: Re: Proposed Amendments to CP-201

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Lou, Dear George,

I have attached ARID's comments and supporting information regarding Proposed Amendments to CP-201. We ask that you please add this latest summary to our previously submitted information on this topic.

I have four attachments as follows:

- ARID Comment Summary

- Spreadsheet with two tabs; derivation of refueling and storage tank emissions and cost effectiveness calculations (update of previously submitted spreadsheet, based on incorporating parameters used in ARB technical reports)

- Explanation of spreadsheet calculations

- Copy of recently published, peer-reviewed article entitled, "Vent pipe emissions from storage tanks at gas stations: Implications for setback distances"

We are actively monitoring pressure profiles from both Phase II Vac Assist and Phase II Balance California GDF, and we are pleased to provide raw data and/or pressure driven fugitive and vent emissions calculations per your request.

We look forward to continuing our two decades-long work with you and ARB Staff on the shared goal of providing state-of-the-art, cost-effective vapor recovery technology to yield healthy, safe and clean air for Californians.

best regards, Ted

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On 01-May-20 12:22 PM, Dinkler, Louis@ARB wrote:

Hi Ted,

Thanks for providing the meeting summary and thank you for providing the prior email response (with emission calcs and cost effectiveness information) shortly after our conference call on April 20. We value your feedback and will carefully review your calculations and assumptions and schedule a follow up conference call/webinar for further discussion. We also acknowledge that the ARID Permeator has passed a series of rigorous challenge mode tests (PWD simulation, high evaporation rates) required by CARB to obtain certification.

With the public workshop just a few days away, we have been focused on releasing supporting documentation on our vapor recovery program webpage. Over the last few days, we have posted the workshop presentation and several technical support documents that convey our findings pertaining to frequency of overpressure alarms, effectiveness of the overpressure alarm, and perhaps most importantly, the magnitude of pressure driven emissions from a statewide basis and specific to the assist system. Allow me to point you to two key items that will be worth reviewing:

1. Evaluation of Pressure Driven Emissions from Gasoline Dispensing Facilities <https://ww2.arb.ca.gov/sites/default/files/2020-04/Evaluation%20of%20Pressure%20Driven%20Emissions%20DRAFT.pdf>
2. Estimate of Pressure Driven Emission Occruing at GDF Equipped with the Assist Phase II EVR System https://ww3.arb.ca.gov/vapor/op/studies/assist/vropa6.pdf?_ga=2.185157354.270398422.1588349984-205465187.1540412779

Due to our focus on the workshop preparation, we have not had the opportunity to fully review and evaluate your recent documents. So once the dust settles, we will reach out to you for additional discussion.

Look forward to speaking to you soon. PS, the workshop presentation has also been loaded is available at:

<https://ww2.arb.ca.gov/sites/default/files/2020-04/CARB%20Staff%20May%205%202020%20EVR%20Workshop%20Presentation.pdf>



Louis Dinkler
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Vapor Recovery Regulatory Development Section
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From: Ted Tiberi <ttiberi@aridtech.com>
Sent: Wednesday, April 29, 2020 5:57 AM
To: Lew, George@ARB <george.lew@arb.ca.gov>
Cc: Dinkler, Louis@ARB <louis.dinkler@arb.ca.gov>
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