

October 03, 2018

Lou Dinkler
Manager,
California Air Resources Board
Monitoring and Laboratory Division
1900 14th Street
Sacramento, CA 95811
Submitted electronically to ldinkler@arb.ca.gov

Re: Proposed Amendments to Enhanced Vapor Recovery Regulations to Standardize Gas Station Nozzle Spout Dimensions to Help Address Storage Tank Overpressure

Dear Mr. Dinkler:

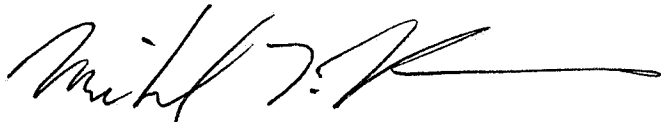
It has been great to get this cross-functional working group working towards the resolutions of the specification and regulations. As the Chairman of the Refueling Taskforce and the Fuel Systems Subcommittee, I personally have found that the relationships on a personal and business level with CARB, (Lou, Tahir, Michelle, Sam, John, Gurj, and Jason) to be excellent and have seen this protean project of improving the interfaces well worthwhile. Thanks to all who have been involved to bring this series of regulations and specifications to the level of understanding the groups, have now.

This comment letter will cover the areas that still have some need for clarification proposals for consideration:

CP-201 and CP-207

- Documentation of the nozzle specifications, SAE would suggest that the spout diameter range adjust to match with the current and sustained J285 dimensions of 20.5-21.34 mm.
 - Reducing the range to 20.12 can have detrimental consequences for developing a device to preclude Urea/SCR nozzles from opening a nozzle prevention device.
 - ISO 22241 for Urea/SCR systems require devices to accept Urea/SCR nozzles as large as 20.0mm to be accepted.
 - A Petrol nozzle this small with wear will fit into a Urea System.
 - This would give 0.1mm of range for acceptance/rejection between the two styles of nozzles.

Thank you and your team for the participation in the SAE taskforce and the great work on development of these updated regulations. It has been a pleasure developing the relationships and working with your team.



MICHAEL T. ZITKOVICH, on behalf of the SAE Refueling Interface Taskforce

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