



October 22, 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

Franklin Fueling would like to recommend the following changes to the proposed amendments to the enhanced vapor recovery regulations.

Franklin Fueling recommends that the **A2 Anchor Length** that is currently specified as **0.5/12.5 mm (0.020/0.500in)** be changed to **12.5 mm (0.500 in) max**. The anchor length specification appears in table 4-2 in CP-201, Table 5-2 in CP-206, and Table 3-2 in CP-207.

Franklin Fueling recommends that drawing for the **Nozzle Bellows Contact Angle** be updated to show the angle being taken perpendicular to the spout to agree with the text describing the drawing. This drawing appears in Figure 4B in CP-201 and Figure 5B in CP-206.

Franklin Fueling recommends that the **B3 Nozzle Bellows Face Flatness** be changed to **Nozzle Bellows Face Profile**. In addition, Franklin fueling recommends that the Dimension **2.5 mm (0.098 in) total indicator reading (TIR) max over seal surface** be changed to **2.5 mm (0.098 in) profile tolerance on seal surface**. The Nozzle Bellows Flatness specification appears in Table 4-2 and Figure 4B in CP-201 as well as Table 5-2 and Figure 5B in CP-206.

Franklin Fueling recommends that the definition for **TIR** in D200 shown below:

total indication reading (TIR)

the difference between the maximum and minimum measurements, that is, readings of an indicator, on the planar, cylindrical, or contoured surface of a part such as the vapor recovery nozzle bellows, showing its amount of deviation from flatness, roundness (circularity), cylindricity, concentricity with other cylindrical features, or similar conditions. Also known as full indicator movement.

Be replaced with:

Profile

3-Dimensional tolerance zone existing of 2 parallel surface curves that follow the contour of the surface profile across the entire length of the surface that are the specified tolerance (2.5mm) apart.

Sincerely,



James Novak
Franklin Fueling
(608) 838-5645
novak@franklinfueling.com