

California Air Pollution Control Officer Association (CAPCOA) Vapor Recovery Committee Comments on Proposed Amendments to Section 94006(b), Title 17, CCR and VRED List (adopted September 23, 2002 and last amended June 22, 2005)

The San Diego Air Pollution Control District on behalf of the CAPCOA Vapor Recovery Committee submitted these comments to ARB staff on July 19, 2007. However, it appears these comments were not incorporated into the proposed amendments. San Diego APCD on behalf of the CAPCOA Vapor Recovery Committee respectfully requests the comments below be considered.

- 1.) Page 3- Most of the Balance executive orders are struck out yet the systems are allowed to be installed. What is ARB's intent on striking out these systems?
- 2.) Page 17 – The verification procedure to determine if vapor pumps are inoperative for G-70-191 AA is “direct observation in accordance with the Healy IOMM.” The committee recommends a more specific reference as to specific sections and/or pages in the IOMM..
- 3.) Page 24 – The verification procedure to determine if vapor pumps are inoperative for both VR-201-XX and VR-202-XX is “direct observation in accordance with the Healy Phase II EVR System Including Veeder –Root ISD IOMM”. The committee recommends a more specific reference as to specific sections and/or pages. The committee also recommends the title be changed to Healy Phase II Enhanced Vapor Recovery System Executive Order VR-201/202-XX including Approved I.O.M.M.
- 4) The committee requests ARB consider adding “insertion interlock mechanism which will allow dispensing when the vapor collection boot is uncompressed” as a defect for all Healy Systems as has been done for Balance Systems.

Should you have any questions, please contact Randy Smith of the San Diego Air pollution Control District at (858) 586-2677.