

State of California
AIR RESOURCES BOARD

PUBLIC HEARING TO CONSIDER ADOPTION OF REGULATIONS FOR THE
CERTIFICATION AND TESTING OF GASOLINE VAPOR RECOVERY SYSTEMS
USING ABOVEGROUND STORAGE TANKS

June 21, 2007

Staff's Suggested Changes to the Original Regulatory Proposal for
Certification and Test Procedures CP-206 and TP-206.3

Staff recommends that the Air Resources Board approve modifications to the regulations originally proposed in the Staff Report released on May 4, 2007. These modifications are suggested in response to review and informal comments received since the Staff Report was published. The modifications affect the text of the Certification and Test Procedures, CP-206 and TP-206.3.

Modifications to CP-206 (Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities Using Aboveground Storage Tank)

1. As originally noticed, CP-206 sections 4 (Table 4-1), 4.4, 4.6, 5 (Table 5-1), and 5.14 proposed that U.S. EPA Method 21 (combustible gas detection devices) was inadvertently specified for vapor leak detection. U.S. EPA Method 21 is not specified in CP-201 (Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities) for leak detection. The change is to delete references to U.S. EPA Method 21 in CP-206 in order to be consistent with CP-201.
2. As originally proposed, the procedure requires testing to be conducted at an operating gasoline dispensing facility (GDF). The change will allow testing to be done on a tank that does not transfer gasoline.
3. As originally proposed, the procedure is not clear on the number of tanks to be tested. The change will allow the manufacturers to specify those tanks which represent a worse case scenario from an emission standpoint.

Modifications to TP-206.3 (Determination of Static Pressure Performance of Vapor Recovery Systems at Gasoline Dispensing Facilities with Aboveground Storage Tanks)

1. As originally noticed, the first three subsections in Section 4 were incorrectly number as section 4.5 (repeat). These sections should be 4.1, 4.2, and 4.3.
2. As originally proposed, section 4.5 did not specifically require the use of electronic pressure measuring device or digital pressure indicator to measure pressure tank pressure. The change will require that electronic pressure measuring devices or digital pressure indicators be used because they are more accurate than mechanical pressure gauges.
3. As originally proposed section 5.3 will require combustible gas analyzers to be calibrated every 180 days with 2.1 mole percent of methane by volume. Modification to section 5.3 will require that combustible gas analyzers be calibrated in accordance with manufacturer's instruction.
4. As originally proposed section 6.4 requires that the minimum ullage be 25% of the tank capacity and maximum ullage be 75% of tank capacity. Modification to section will make it clear that the maximum and minimum ullage applies to all tanks when tanks are manifolded.
5. As originally proposed, section 6.5 incorrectly references equation 9-1 in section 9. The change is to reference the equation 8-1 in section 8.
6. As originally proposed section 6.6 requires that nozzles be properly hung in the dispenser boot. Modifications to section 6.6 will require that dispenser covers be in place and no dispensing be allowed during the test. This modification will make TP-206.3 consistent with the currently adopted TP-201.3 (Determination of 2 Inch WC Static Pressure Performance of Vapor Recovery Systems at Dispensing Facilities), which is used to determine the static pressure of underground storage tank.
7. As originally proposed section 6.11 requires the leak test assembly to be installed per Figure 1. Modification to section 6.11 would allow other leak test assembly configurations by stating that Figure 1 is an example and that other examples could be found in Figures 1 to 3 in TP-201.3. The title of Figure 1 is changed to reflect that the figure is an example.