

October 1, 2018

Mr. Michael Lessley
Triangle Environmental, Inc.
730 N. Mariposa Street
Burbank, California 91506-1629

Dear Mr. Lessley:

The California Air Resources Board (CARB) staff conducted an in-use equivalency evaluation of the Triangle TriTester with Software Version 2.01. The main objectives of the study were to reevaluate equivalency to Exhibit 5 and to determine equivalency to Exhibit 9 and Exhibit 10. These exhibits are found in Executive Order VR-201 and VR-202, Assist Phase II Enhanced Vapor Recovery System with and without In-Station Diagnostics.

CARB staff conducted testing to evaluate Version 2.01 for equivalency using the United States Environmental Protection Agency's Method 301 to determine whether Version 2.01 can be used in lieu of the exhibits identified above. In summary, CARB staff concludes that that the TriTester Version 2.01 is still equivalent to Exhibit 5. However, staff does not deem Version 2.01 equivalent to Exhibit 9 and 10, unless the TriTester is used in the direct read mode (Software Version DR) to dispense 4.5 to 5.0 gallons and utilizing the raw value cubic feet value to manually calculate the final vapor to liquid values for in-station diagnostic comparison.

If you have any questions or need further information, please contact Mr. Sam Vogt at (916) 322-8922 or by email at samuel.vogt@arb.ca.gov, or contact Ms. Merrin J. Wright at (916) 324-6191 or by email at merrin.wright@arb.ca.gov.

Sincerely,



George Lew, Chief
Vapor Recovery and Fuel Transfer Branch
Monitoring and Laboratory Division

cc: See next page.

Attachment

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cc: (via email)

Steve Mosunic
Sacramento Metropolitan Air Quality Management District

Karen Wilkins
San Diego County Air Pollution Control District

William Thompson
South Coast Air Quality Management District

Merrin J. Wright, Manager
Vapor Recovery In-Use Section

Sam Vogt
Monitoring and Laboratory Division