



Winston H. Hickox
Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman

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Gray Davis
Governor

May 15, 2001

01-02

Mr. Eric Riffle
Principle Engineer
Hydraulic Components Engineering and Vapor Recovery Systems
Marconi Commerce Systems
7300 West Friendly Avenue
P.O. Box 22087
Greensboro, North Carolina 27420-2087

Dear Mr. Riffle:

In your letter dated January 29, 2001, Marconi Commerce Systems requested California Air Resources Board (CARB) approval of two design modifications for your Encore series dispensers.

The first modification was for the use of T-drilled connections on the two inner legs of the M01237 Balance upper tubing assembly used for multiple hose per side dispensers instead of the standard Nibco tee fittings. This method of connection, as well as the test data supplied on the piping connection standards for the Encore production frame, has been evaluated. Our initial concern was the strength reduction of the T-drilled joint compared to the standard Nibco tee configuration. However, the data and pictures provided on the strength of the Encore production frame and method of mounting the piping within that frame, demonstrated that the copper tubing is well supported. In addition, this new piping configuration, when compared to your current method, will reduce the amount of potential leak sources from fifteen (15) to eleven (11). This represents a reduction of over 26%.

The second modification was to use the M01446 Balance upper tube in dispensers for single hose per side units. Currently, when you have a single hose per side dispenser, you install the M01237 Balance upper tubing assembly into the dispenser and plug three of the four ports used for vapor recovery. This new piping configuration, when compared to your current method, will reduce the amount of potential leak sources from fifteen (15) to four (4). This represents a reduction of over 73%.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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We find that the use of the M01237 Balance multiple upper tube with T-drilled connections, when installed in accordance with the manufacturer's installation instructions on the Encore dispenser series will not adversely affect the performance of vapor recovery systems. In addition, we find that the use of the M01446 Balance single upper tube, instead of the M01237 Balance manifold upper tubing, when installed in accordance with the manufacturer's installation instructions on the single hose per side Encore series dispensers will not adversely affect the performance of vapor recovery systems.

The use of the T-drilled M01237 balance upper tubing assembly for multiple hose dispensers and the M01446 balance upper tubing for single hose dispensers does not affect the status of Marconi Commerce Systems current certification, under Executive Order G-70-52, of the Encore series dispensers for Phase II vapor recovery systems.

As you know, with the recent adoption of the Enhanced Vapor Recovery (EVR) standards, only those Phase II vapor recovery systems and components that have been certified to the new EVR standards may be sold in California after April 1, 2003. These components will be evaluated as part of the Phase II EVR system if Marconi includes them in the EVR application.

If you have questions regarding the M01446 balance upper tube, please contact either Laura McKinney at (916) 327-0900 or Paul Marzilli at (916) 445-7431.

Sincerely,

Signed Copy on File

George Lew, Chief
Engineering and Certification Branch
Monitoring and Laboratory Division