



Alan C. Lloyd, Ph.D.  
Agency Secretary

# Air Resources Board

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Arnold Schwarzenegger  
Governor

June 8, 2005

# 03-06a

Mr. Thomas J. Smith  
Chief Engineer  
Hirt Combustion Engineers, Inc.  
3659 San Gabriel River Parkway  
Pico Rivera, California 90661

Dear Mr. Smith:

On March 28, 2003, the California Air Resources Board (ARB) issued Approval Letter #03-06 for Onboard Refueling Vapor Recovery (ORVR) compatibility with the Hirt Combustion Engineers, Inc. (Hirt) VCS 400-7 system. Because of recent date revisions to the Enhanced Vapor Recovery (EVR) timeline, it was necessary to update Approval Letter #03-06 to reflect the current EVR schedule.

ARB staff witnessed a demonstration conducted by Hirt Combustion Engineers, Inc. (Hirt) VCS 400-7 Phase II Vacuum Assist Vapor Recovery System certified under Executive Order G-70-177-AA. The purpose of the demonstration was to determine whether the Hirt VCS 400-7 system is capable of operating as certified when fueling vehicles equipped with ORVR systems.

The results of the evaluation demonstrated that the Hirt VCS 400-7 system did not generate excess emissions as a result of fueling of ORVR-equipped vehicles. Based upon the results of the Hirt ORVR demonstration, and a subsequent ARB fueling point analysis, the Hirt VCS 400-7 system is hereby approved for ORVR compatibility with the following limitations:

- Existing GDF that use the Hirt VCS 400-7 system shall limit their total fueling points to 8 for unihose dispenser configurations or 8 multiple hose dispenser fueling points, or shall upgrade to an ARB-certified EVR system by the deadline below.
- ORVR deadline:
  - Existing GDF with annual gasoline throughput greater than 2.0 million gallons/year must be ORVR compatible by September 1, 2005.
  - Existing GDF with annual gasoline throughput greater than 1.0 million gallons/year must be ORVR compatible by January 1, 2006.

*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

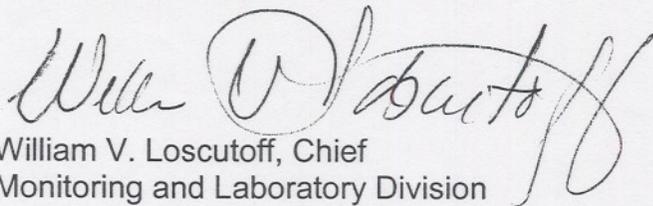
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- Existing GDF with annual gasoline throughput less than 1.0 million gallons/year must be ORVR compatible by March 1, 2006.
- The above thought is based on 2003 calendar year.

After April 1, 2005, only EVR certified Phase II vapor recovery systems may be installed in new facilities. Existing GDF using the Hirt VCS 400-7 system installed prior to April 1, 2005, may continue to operate until January 1, 2009, as conditioned above. After January 1, 2009, all gasoline dispensing facilities utilizing underground storage tanks must comply with the standards and specifications for Phase II EVR systems as set forth in CP-201 Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities.

If you have questions or need further information, please contact either Joe Guerrero at (916) 324-9487 or via email at [jguerrer@arb.ca.gov](mailto:jguerrer@arb.ca.gov) or Sam Vogt at (916) 322-8922 or via email at [svogt@arb.ca.gov](mailto:svogt@arb.ca.gov).

Sincerely,



William V. Loscutoff, Chief  
Monitoring and Laboratory Division

cc: Elizabeth Haven  
State Water Resources Control Board

Tania Leisten  
Monterey Bay Unified AQMD

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South Coast AQMD

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Bob Bradt  
Hirt Combustion Engineers