



Air Resources Board



Linda S. Adams
Secretary for
Environmental Protection

Mary D. Nichols, Chairman
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Arnold Schwarzenegger
Governor

June 1, 2009

#09-02

Mr. Glenn K. Walker
President
Vapor System Technologies
650 Pleasant Valley Drive
Springboro, Ohio 45066

Dear Mr. Walker:

REINSTATEMENT OF ENHANCED VAPOR RECOVERY (EVR) PHASE II BALANCE COMPONENTS AS THE ONLY APPROVED REPLACEMENT COMPONENTS FOR BALANCE PHASE II SYSTEMS

Thank you for your letter of May 18, 2009, and the information supplied for May 29 that showed that Vapor System Technologies (VST) is now able to meet demand for its hanging hardware components. As of June 15, 2009, the only replacement components approved for installation with an EVR Phase II balance system are those which have been certified as part of that EVR system. Currently only VST's EVR hanging hardware components are certified as part of an EVR balance system, under Air Resources Board (ARB) Executive Orders (EO) VR-203, VR-204, and VR-205. Also as of June 15, 2009, if compatible components have been certified to meet phase II EVR standards, only those components can be installed as replacement parts on pre-EVR balance systems. This letter supersedes Approval Letters #09-01 and #08-01 and Advisory #374.

ARB staff issued Approval Letter #09-01 on April 8, 2009, in response to reports of a significant backlog of orders for VST EVR hanging hardware. The approval letter allowed gasoline dispensing facility (GDF) operators to temporarily use pre-EVR balance components as replacement parts for both pre-EVR and EVR balance systems. As a condition to install the pre-EVR components, the operator had to obtain a letter from each of two equipment suppliers stating that the ordered EVR component will not be delivered for at least two weeks. The GDF operator was also required to maintain a copy of both letters at the facility and make them available to district inspectors. The pre-EVR replacement components were to be replaced by EVR components by April 1, 2010.

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

EVR Phase II Balance Systems

As of June 15, 2009, if a replacement part is needed, a GDF operator with an EVR balance vapor recovery system must install an EVR component that was certified as part of that system. Any pre-EVR replacement components which were installed prior to June 15, 2009, may remain in service until March 31, 2010. The GDF operator must retain the letters obtained from the equipment supplier as long as the pre-EVR components are in service. The district may require the GDF operator to maintain other information regarding the use of replacement pre-EVR replacement components. By April 1, 2010, a GDF operator with a VST System shall remove any pre-EVR replacement component and replace it with an EVR component listed in Exhibit 1 of Executive Orders VR-203 or VR-204.

Pre-EVR Phase II Balance Systems

As of June 15, 2009, if a replacement part is needed, a GDF operator with a pre-EVR balance system must install a replacement part that has been certified to meet the EVR Phase II standards if the EVR-certified component is compatible with the pre-EVR system. Approval Letter #09-01 required that if a pre-EVR component was installed, the GDF operator was required to retain the letters obtained from the equipment suppliers as long as the pre-EVR component was in service. Approval Letter #09-01 also stated that the pre-EVR component must be replaced with an EVR component by April 1, 2010. This approval letter supersedes Approval Letter #09-01 and the above two requirements. The GDF operator is now allowed to continue using the pre-EVR replacement component for the remainder of its useful life, the allowable four-year in-use period, or the four years after the effective date of the EVR requirement without the requirement to keep a letter on file from the equipment supplier. The final compliance dates are given for each type of facility listed below.

Approval Letter #08-01 and Advisory #374 were issued on June 30, 2008 to require that if EVR-certified replacement components were available and compatible with a GDF's pre-EVR Phase II balance system, the EVR-certified components must be installed as replacement parts. At that time the only hanging hardware components certified to EVR standards were VST EVR nozzles, breakaways, and hoses and Goodyear Premier hoses. This letter authorizes a GDF operator to install as replacement parts any other hanging hardware components that are certified to EVR standards and are determined by ARB to be compatible with the pre-EVR balance system. In Approval Letter #07-09, ARB staff determined that VST EVR nozzles, breakaways, and hoses were compatible with a number of pre-EVR Phase II systems listed in ARB EO G-70-52-AM.

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Pre-EVR balance systems are vapor recovery systems that are authorized under ARB EO G-70-52-AM, including systems at the following gasoline dispensing facilities. The date in parenthesis is when the facility must comply with Phase II EVR requirements.

1. Facilities that have aboveground storage tanks (January 1, 2015).
2. Facilities with underground storage tanks (UST) that are bulk plants and which also dispense gasoline to vehicles (April 1, 2011).
3. Facilities with USTs that have liquid condensate traps (April 1, 2010).
4. Facilities that are located in the following counties: Del Norte, Humboldt, Lake, Mendocino, Northern Sonoma County Air Pollution Control District portion of Sonoma, San Luis Obispo, Siskiyou, and Trinity (July 27, 2011) .
5. Facilities in the counties of Alpine, Lassen, Modoc, Plumas and Sierra that have an annual throughput of 240,000 gallons of gasoline or less (April 1, 2011).
6. Other gasoline dispensing facilities with USTs that are not required to install EVR Phase II

If you have questions or need further information, please contact Frances Cameron at (916) 445-9314 or via email at fcameron@arb.ca.gov, or Pat Bennett at (916) 322-8959 or via email at pbennett@arb.ca.gov .

Sincerely,


William V. Loscutoff, Chief
Monitoring and Laboratory Division

cc: See next page.

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cc: Terry Dressler
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