



Cal/EPA

California
Environmental
Protection
Agency



Air Resources Board

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Pete Wilson
Governor

Secretary for
Environmental
Protection

July 7, 1997

James Healy
Healy Systems, Inc.
17 Hampshire Drive
Hudson, New Hampshire 03051

#97-06

Dear Mr. Healy:

Healy System Monitor

The California Air Resources Board (CARB) has evaluated and tested the Healy System Monitor which is required for use by Executive Order G-70-165. The Executive Order requires the installation of a CARB-certified system by July 1, 1996, which was extended to January 1, 1997. The System Monitor includes: 6275 Vent Sensor Assembly, 6280 System Monitor, a 3 inch water column (w.c.) Pressure Vent (PV) valve, a 1 to 2 inch w.c. pressure valve, a vacuum switch, and control box.

A typical installation of the vent pipe configuration is illustrated below in Figure 1. The 1 to 2 inch w.c. valve allows the pressure to bleed past the sensor, indicating that venting is occurring. This venting action sends a signal to the monitor and initiates a vent light. Because this configuration uses a pressure valve which may vent below 2.0 inches water column, static decay testing will require that this component be "bagged" for the test. The bag shall contain the valve but not the connection to the vent pipe and shall be removed after the test. One currently approved pressure valve is the OPW Model 523LP-2200, 1.75 inch w.c. valve.

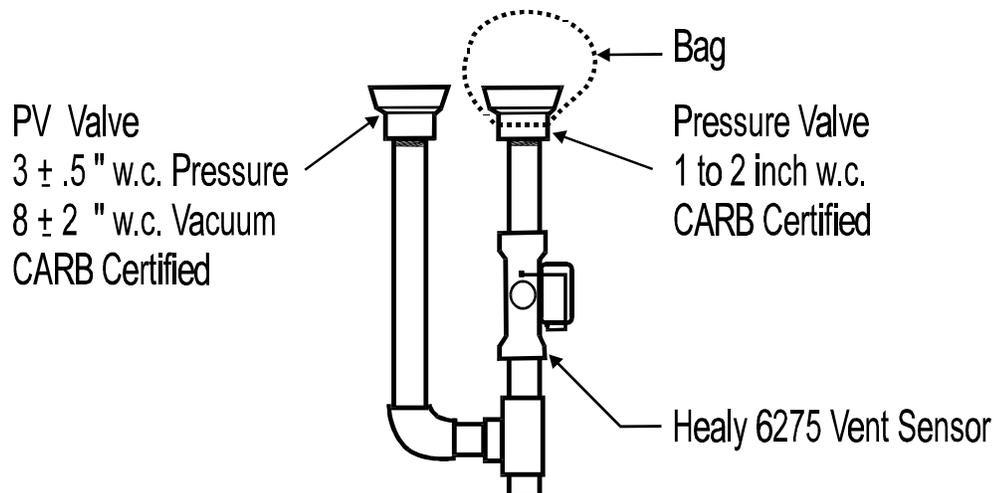


Figure 1

Instructions on the side of the monitor shall indicate basic operating instructions for retrieving failure and status reports. The parameters are to be set as follows:

Vent Test Period	0024 (hours)
Max. Vent Period	0010 (hours)
Max. Vent Err. Before Alarm	0001
Max. Run Startup Time	0010 (secs)
Max. Vac Err. Before Alarm	0003

This unit is designed to monitor venting which occurs whenever the pressure in the underground storage tank exceeds 1-1/2 inches water column (wc). This is indicated by a very low level of flow from the system through orifice meter on the low pressure leg of the vent monitoring apparatus. Pressure in the storage tanks in excess of the setting of the pressure vacuum valve on this leg, which is 1-1/2 inches wc, is registered by the monitor. Flow across this orifice meter for a period of time which is more than 10 hours, accumulated, in a calendar day, indicates a problem with the system. The approved monitor shall have an audible alarm that cannot be turned off, but rather can be reset to alarm every (4) hours. This audible alarm shall alert the attendant that service to the system may be required and a qualified technician should be contacted. The main purpose of the monitor is to identify failure conditions. The system shall be removed from service when the monitor alarms until maintenance is performed to correct the problem or unless continued operation is allowed under a local district variance or breakdown rule. Vacuum failures indicated by the monitor can be verified with a gauge at the dispenser.

The amount of vapor lost through the low pressure leg of the vent pipe system is very small, and periods of venting less than ten hours do not necessarily constitute a violation. Venting through the main leg of the system which is documented and which, by volume, exceeds ten percent of the product throughput volume are considered a violation, however, regardless of whether the monitor alarms.

The system shall be installed and wired such that no dispensing can occur unless the monitor is ON and operational. This feature will insure the monitor is detecting and recording any failures. It is not intended to terminate dispensing of fuel at the service station.

I find that the Healy System Monitor, when installed in accordance with the manufacturer's instructions, will not adversely affect the performance of vapor recovery systems on which they are installed and is approved for use with Healy Phase II Vapor Recovery Systems. Executive Order G-70-165 provides that all Healy Model 600 Systems shall be equipped with the system monitor no more than 60 days after the monitor is certified. This approval is effective immediately and all systems installed under Executive Order G-70-165 shall be equipped with this monitor by September 15, 1997.

If you have any questions or wish to discuss this matter further, please call Joe Guerrero at (916) 324-7343 or Laura McKinney at (916) 327-1525.

Sincerely,

INTERNET VERSION

James J. Morgester, Chief
Compliance Division

cc: Mr. Jim Johnston, Chairman,
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Lynn LaBarber
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