



Matthew Rodriguez
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov



Edmund G. Brown Jr.
Governor

April 1, 2015

Mr. Mike Lattner
Senior Engineer
Morrison Bros. Company
570 East 7th Street
P.O. Box 238
Dubuque, Iowa 52004-0238

Dear Mr. Lattner:

On February 26, 2015, Morrison Bros. submitted documentation to the Air Resources Board (ARB) seeking approval to sell vapor recovery equipment that has been modified from the version listed under Executive Order (EO) VR-402, *Morrison Brothers Phase I Enhanced Vapor Recovery System for Aboveground Storage Tanks*. As a result of new standards by Underwriters Laboratories (UL) specification 2583, *Outline of Investigation for Fuel Tank Accessories*, covers of the 244 series emergency vents will need to be modified to include new verbiage and emergency vent heights may have to be increased up to 0.5 inches. According to the submittal, UL allows manufacturers to sell existing equipment that they have in stock, but once that stock has been exhausted, Morrison Bros. is required produce the 244 series emergency vents to the UL 2583 specification.

EO VR-402 is set to expire on July 1, 2015 and Morrison Bros. has begun the process for renewing the Phase I certification, which will also include the abovementioned modifications. Morrison Bros. anticipates selling out of their existing stock of the 244 series emergency vents by April 1, 2015 and has requested permission to sell the emergency vents modified to UL 2583 specifications before completing the renewal process of EO VR-402.

The first change to the 244 series emergency vents is the inclusion of new verbiage on covers of the vents, where UL requested two different marking, distinguishing those with opening pressure below 0.5 pounds per square inch (psi) and those with opening pressure at or above 0.5 psi. Figure 1 is a line drawing of the 244 series emergency vent as it is currently certified by EO VR-402. Figure 2 depicts the 244 emergency

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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series vent covers that comply with the UL 2583. Please note the EVR identification tag is not pictured in Figure 2, but will be required once the emergency vent is assembled by Morrison Bros.

The second change to the 244 series emergency vents is that the height dimensions of the cover or the body may have increased up to 0.5 inches depending on the pipe size to accommodate adjustments in flow capacity or opening setting. The length of the bolt for the 6 inch and 8 inch size models increased to 0.5 inches or less. All materials used in the manufacture of the 244 series emergency vents are the same as emergency vents currently listed in EO VR-402.

ARB staff reviewed the modifications to the 244 series emergency vent and determined that neither the cover verbiage change, nor the height increase will affect the component's functionality in relation to vapor recovery. Based on this review, ARB staff intends to include the modified 244 series emergency vent in the next amendment of EO VR-402, via the renewal process.

The renewed EO VR-402 will include specifications, images, and line drawings of the 244 series emergency vents in the appropriate Exhibits. The ARB Approved Installation, Operation, and Maintenance Manual will also be updated to include the modified emergency vents. While ARB completes the Executive Order renewal process, AST owners/operators and installation contractors who wish to install Morrison Bros. 244 series emergency vents that have been modified to meet UL 2583 specifications may do so. Please note that this letter may be utilized until the Executive Order renewal process is complete.

If you have questions, please contact Tahir Muhammad at (916) 449-5289 or via email at tahir.muhammad@arb.ca.gov or Lou Dinkler at (916) 324-9487 or via email at louis.dinkler@arb.ca.gov.

Sincerely,



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

cc: See next page.

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cc: (via email)

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San Joaquin Valley Air Pollution Control District

Tim Wolff
San Diego County Air Pollution Control District

George Kasper
South Coast Air Quality Management District

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Figure 1: 244 Series Emergency Vent as Currently Certified

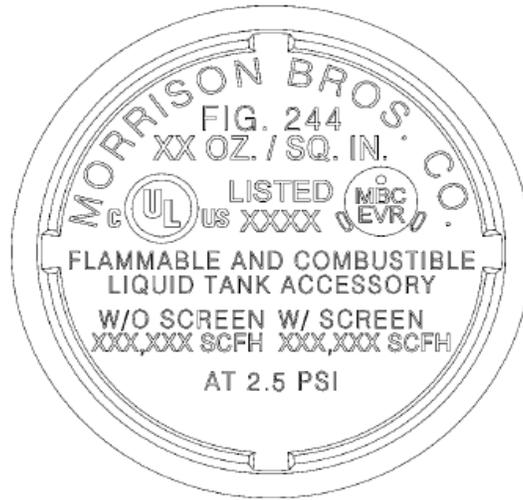
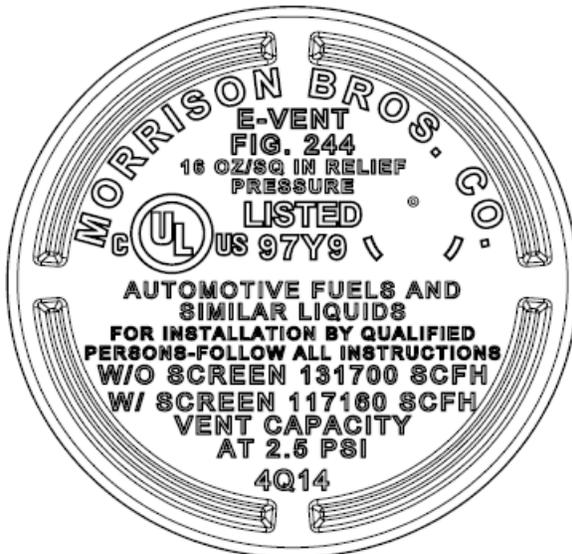


Figure 1A-2
Morrison Bros. 244 Cover Marking Diagram
 (The X designation will contain a value which may vary depending upon the size and pressure setting of the vent)

Figure 2: 244 Series Emergency Vent as Proposed



Vent sample with relief opening pressure greater than or equal to 0.5 psi.



Vent sample with relief opening pressure less than 0.5 psi.