



Air Resources Board



Matthew Rodriguez
Secretary for
Environmental Protection

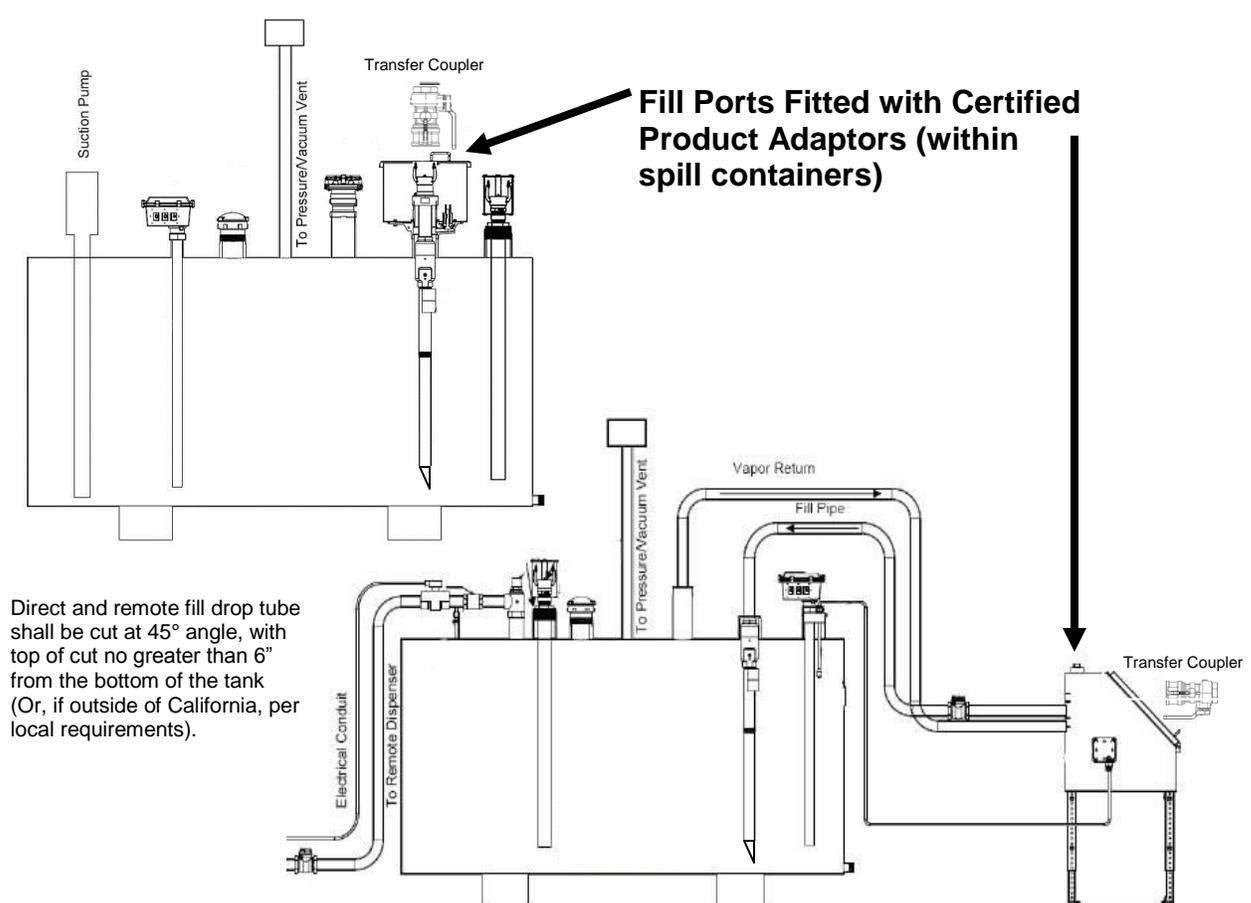
Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Edmund G. Brown Jr.
Governor

April 9, 2014

Dear Fuel Providers and Aboveground Storage Tank (AST) Owners:

The Air Resources Board (ARB) seeks to clarify an issue raised by staff at local air pollution control districts and air quality management districts. District staff has observed some fuel providers incorrectly delivering gasoline into ASTs equipped with ARB certified Phase I enhanced vapor recovery (EVR) systems. In these situations, fuel providers have attempted to drop fuel into inappropriate tank top openings, such as emergency vent bungs and dedicated gauging ports, due to the lack of a compatible fuel transfer coupler and/or inattentiveness. The only acceptable point of delivery into the AST is using the fuel transfer coupler and delivering fuel via the fill port and certified product adaptor. See diagrams below.



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

This letter serves to remind tank owners and fuel providers that when gasoline is delivered into ASTs equipped with Phase I EVR systems, that the appropriate certified transfer coupler and the AST's certified Phase I fill adaptor must be utilized. Executive Orders VR-401 and VR-402 require the use of the OPW 1711D/1712D Series Kamvalok Coupler and the Morrison Bros. 928 Series Coupler, respectively (see below). These Executive Orders can be found at www.arb.ca.gov/vapor/eo-astphasei.htm. Additionally, those AST owners required to install Phase I EVR equipment by the July 1, 2014 deadline¹ must use the appropriate couplers when the AST is fueled by a gasoline delivery vehicle. The couplers must either be stored on site or with the cargo truck making the delivery.

**OPW 1711D/1712D Series
Kamvalok Coupler**



Morrison Bros. 928 Series Coupler



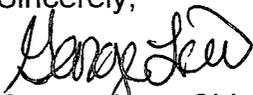
Failure to utilize the certified transfer coupler and removal of Phase I components to deliver gasoline through any point other than the fill port, that is equipped with certified product adaptor, will result in uncertified configurations. Therefore, AST owners/operators, as well as cargo truck operators, may be subject to enforcement action from the local air district if correct fuel delivery procedures and equipment are not employed.

¹ To determine if the July 1, 2014 deadline applies to you please refer to ARB's Regulatory Advisory issued February 28, 2014, available at <http://www.arb.ca.gov/vapor/ASTRegAdvisory022614.pdf> and consult with your local district.

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For more information, please see the ARB Vapor Recovery homepage at www.arb.ca.gov/vapor/vapor.htm.

Sincerely,



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

cc: Jon Adams
San Diego County Air Pollution Control District