



# Air Resources Board



**Matthew Rodriguez**  
Secretary for  
Environmental Protection

**Mary D. Nichols, Chair**  
1001 I Street • P.O. Box 2815  
Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)

**Edmund G. Brown Jr.**  
Governor

December 3, 2015

15-01

Mr. Jose E. Rodriguez  
Director of Technical Services  
EMCO Wheaton Retail  
1004 West Covina Parkway #413  
West Covina, California 91790

Dear Mr. Rodriguez:

Thank you for your letter requesting approval from the Air Resources Board (ARB) to list the certified EMCO Model A4110EVR coaxial hose swivel as an optional component on the EMCO Wheaton Retail (EMCO) Phase II Enhanced Vapor Recovery (EVR) Systems, Executive Orders (EO) VR-207 and VR-208. The hose swivel is currently a required component in EOs VR-207 and VR-208 and is installed between the Goodyear Model Maxxim Premier Plus coaxial curb hose and EMCO Model A4005EVR nozzle. The hose swivel can provide additional flexibility to the end user in situations where the end-user needs to stretch out the hose to reach their fuel tank on the other side of the vehicle. You have stated on various occasions that some gasoline dispensing facility (GDF) owners and operators do not wish to use this hose swivel.

ARB staff has conducted an engineering evaluation of your request as required in Section 19.4.3 of Certification Procedure 201 (CP-201) and determined that elimination of the EMCO Model A4110EVR hose swivel between the Goodyear Model Maxxim Premier Plus coaxial curb hose and EMCO Model A4005EVR nozzle will not adversely affect the performance of the EMCO Phase II EVR Systems. The Goodyear hose can be installed directly to the EMCO nozzle, without the EMCO Model A4110EVR hose swivel, and this configuration has demonstrated compatibility and performance as currently certified in the Balance Phase II EVR Executive Orders VR-203 and VR-204.

This letter serves only to approve the EMCO Model A4110EVR coaxial hose swivel as an optional component on the EMCO Phase II EVR Systems for the remainder of the allowable in-use period of the systems (that is, until September 15, 2017), at which time the EMCO Phase II EVR Systems, EOs VR-207 and VR-208, can no longer be used unless the certifications are renewed at a later date. GDF owners and operators can choose whether or not to use the EMCO Model A4110EVR coaxial hose swivel in their hose configurations. Installation of either hose configuration must continue to comply with the installation,

*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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operation, maintenance, and performance requirements and specifications in EOs VR-207 and VR-208.

If you have questions, please contact either Mr. Paul Thalken at (916) 445-9499 or via email at [paul.thalken@arb.ca.gov](mailto:paul.thalken@arb.ca.gov), or Mr. Pat Bennett at (916) 322-8959 or via email at [pat.bennett@arb.ca.gov](mailto:pat.bennett@arb.ca.gov).

Sincerely,



Michael T. Benjamin, Chief  
Monitoring and Laboratory Division

cc: (via email)

Tim Wolff  
San Diego County Air Pollution Control District

George Kasper  
South Coast Air Quality Management District

Roseana Navarro-Brasington  
Mojave Desert Air Quality Management District

James Parsegian  
Department of Forestry and Fire Protection

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