Linda S. Adams
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

Arnold Schwarzenegger
Governor

December 29, 2008

Mr. Bill Nelson, Vice President
Franklin Fueling Systems
3760 Marsh Road
Madison, Wisconsin 53718

Dear Mr. Nelson:

In a letter dated December 8, 2008, you requested approval from the California Air Resources Board (ARB) to make a modification to the certified vapor adaptors, model numbers SWV-101-B and SWV-101-SS, listed in Exhibit 1 of Executive Order VR-101, Phil-Tite Phase I Vapor Recovery System. The modification included reducing the diameter of the retainer surface on the Spider so the retainer can completely rest on the machined surface of the Spider when installed in the adapter. If the retainer surface is machined to the current dimension and extreme tolerances, the retainer may not completely rest on the retainer surface causing the Spider to seat incorrectly.

In support of the requested modification, Franklin Fueling Systems (FFS) submitted a sample of the modified vapor adaptors and test results showing the retainer remains fully seated on the modified retainer surface of the Spider. Based on the information provided by FFS, ARB staff determined that this modification will not affect the vapor recovery performance of the adaptors. Revisions to Executive Order VR-101 are not necessary. The component identification and location will remain the same as the current model SWV-101-BB and SWV-101-SS vapor adaptors.

Should you have questions or concerns regarding this letter, please contact either Melinda Weaver at (916) 322-8919 or via email at mweaver@arb.ca.gov, or Pat Bennett at (916) 322-8959 or via email at pbennett@arb.ca.gov.

Sincerely,

George Lew

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

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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cc: Jim Swaney
San Joaquin Valley Air Pollution Control District

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Bay Area Air Quality Management District

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Yolo-Solano Air Quality Management District

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San Diego County Air Pollution Control District

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State Water Resources Control Board