



Linda S. Adams
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chairman
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Arnold Schwarzenegger
Governor

July 9, 2008

Mr. Bill Nelson
Franklin Fueling Systems
Dispensing Systems Product Manager
3760 Marsh Road
Madison, Wisconsin 53718

Dear Mr. Nelson:

In your letter dated June 27, 2008, you stated that Franklin Fueling Systems (FFS) intends to modify the gravel shield used on the 5-gallon Grade Level Spill Container referenced in the EBW Phase I Vapor Recovery System (EBW System), Executive Order VR-103-D. Specifically, FFS has proposed to extend the gravel shield to the bottom of the spill container and reduce the amount of carbon black colorant used in the gravel shield's polyethylene material.

Air Resources Board (ARB) staff has completed an engineering evaluation of the information provided by FFS, and has determined that the proposed changes to the gravel shield will not affect the performance of the EBW System and thus no field testing is required. Therefore, ARB staff determines that FFS can implement the above proposed changes to the gravel shield.

We do not find it necessary to update Executive Order VR-103-D to show the revised gravel shield at this time. However, we intend to show the revised gravel shield in future revisions of Executive Order VR-103. FFS shall provide ARB staff with updated versions of each figure in the Executive Order and corresponding Installation, Operation, and Maintenance (IOM) manual that shows the 5-gallon Grade Level Spill Container and revised, larger gravel shield. Please submit updated drawings to Mr. Scott Bacon within four weeks of receiving this letter

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>.

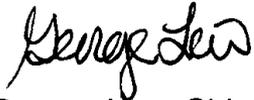
California Environmental Protection Agency

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Should you have questions or concerns regarding this letter, please contact either Scott Bacon at (916) 322-8949 or via email at sbacon@arb.ca.gov, or Pat Bennett at (916) 322-8959 or via email at pbennett@arb.ca.gov.

Sincerely,



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

cc: Jim Swaney
San Joaquin Valley Air Pollution Control District

John Marvin
Bay Area Air Quality Management District

Gary Ma
Yolo-Solano Air Quality Management District

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Kevin Graves
State Water Resources Control Board