



**Linda S. Adams**  
Secretary for  
Environmental Protection

# Air Resources Board

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



**Arnold Schwarzenegger**  
Governor

January 23, 2009

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

Dear Mr. Nelson:

In letters dated April 9, 2008, and June 6, 2008, Franklin Fueling Systems (FFS) requested modifications to components of the Healy Phase II Enhanced Vapor Recovery Systems (VR-201 and VR-202 series executive orders). The modifications requested were: 1) minor changes to the dimension and tolerances of the nozzle diaphragm shutoff spacer to improve reliability of the nozzle insertion interlock mechanism; and 2) changes to the location of electronic components on the VP-1000 control panel to improve cooling of the components.

For the shutoff spacer, Air Resources Board (ARB) staff requested and was provided a sample of nozzles that were first bench tested by ARB staff using our 900 nozzle testing cart and subsequently installed at two high throughput locations in the Sacramento area. ARB staff visited the sites frequently as well as maintaining contact with the station operators to monitor any issues and confirmed that the shutoff performance of the 900 nozzle has not affected any of the vapor recovery aspects of the nozzle design in a negative way.

For the VP-1000 control panel, ARB staff requested and was provided five VP-1000 vacuum pumps with this new control panel installed. One of the five pumps has been installed on the 900 nozzle testing cart and the other four were installed at one of the high throughput locations in the Sacramento area where the shutoff spacer nozzles were installed. ARB staff visited this site occasionally as well as maintaining contact with the station operator to monitor any issues and confirmed that the performance of the VP-1000 vacuum pumps has not been affected as a result of the modification.

Given the information provided by FFS and the results of the evaluations conducted at the evaluation locations, ARB staff has determined that the modifications, when installed in accordance with the manufacturer's installation instructions, will not adversely affect the performance of the vapor recovery system.

*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>.*

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California Environmental Protection Agency

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Approvals for the requested modifications have been received from the other four agencies required by ARB Certification Procedure 201 (CP-201).

No changes to Executive Orders VR-201 and VR-202 are required, and FFS is free to begin marketing the Healy Phase II Enhanced Vapor Recovery Systems with the modifications discussed in this letter.

Should you have questions or concerns regarding this letter, please contact either Paul Marzilli at 916-445-7431 or via email at [pmarzill@arb.ca.gov](mailto:pmarzill@arb.ca.gov), or Pat Bennett at 916-322-8959 or via email at [pbennett@arb.ca.gov](mailto:pbennett@arb.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "William V. Loscutoff". The signature is written in a cursive style with a large, prominent initial "W".

William V. Loscutoff, Chief  
Monitoring and Laboratory Division

cc: See next page

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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

Isam Boulad  
Sacramento Metropolitan Air Quality Management District

Randy Smith  
San Diego County Air Pollution Control District

James Parsegian  
Department of Forestry and Fire Protection

John Roach  
Department of Food and Agriculture

Larry McCune, P.E.  
Department of Industrial Relations

Kevin Graves, P.E.  
State Water Resources Control Board