Air Resources Board

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Linda S. Adams
Acting Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

July 14, 2011

Mr. Gary Gevorgyan
Managing Member
GA Ninety, LLC
13127 Ebell Street
North Hollywood, California 91605

Dear Mr. Gevorgyan:

In a letter dated November 29, 2010, GA Ninety, LLC., initiated a request with the California Air Resources Board (ARB) for the addition of the EasyGrip breakaway reconnection clamp (manufactured by Simple Fit, Inc.) to the Franklin Fueling Systems (FFS) Healy Phase II Enhanced Vapor Recovery Executive Orders (EO) VR-201 and VR-202.

Samples of the EasyGrip reconnection clamp were provided to ARB staff for evaluation. Staff has determined that the EasyGrip reconnection clamp is suitable for the reconnection of the 8701VV breakaway certified on EO VR-201 and VR-202 and can be used as an alternate clamp to the FFS/Healy Model 795 breakaway reconnection clamp shown in the Installation, Operation, and Maintenance Manual.

Note: **The EasyGrip cannot be used as a reconnection clamp for the FFS/Healy Model 807 Swivel Breakaway.** Gasoline Dispensing Facilities that use the 807 Swivel Breakaway must continue to use the 795 reconnection clamp.

During the next revision of the FFS/Healy Phase II EOs, the procedure for using the EasyGrip reconnection clamp will be incorporated into the Installation, Operation, and Maintenance Manual (IOM). In addition, Section 1.4 of the Scheduled Maintenance Section that refers to the reconnection procedure following a driveoff will be updated to note that the EasyGrip can be used for reconnection of the 8701VV Breakaway.

Until the next EO revision can occur, station owners/operators and contractors who wish to use the EasyGrip reconnection clamp can use the procedure shown in the Enclosure of this letter. Additional information on the EasyGrip operation can be found by viewing a video clip on their website at www.simplegrip123.com.

If you have questions, please contact Mr. Paul Marzilli at (916) 445-7431 or via email at pmarzill@arb.ca.gov, or Mr. 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

Enclosure

cc: See next page.

cc: Danny Luong
South Coast Air Quality Management District

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Randy Smith
San Diego County Air Pollution Control District

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Laura Fisher
State Water Resources Control Board

James Parsegian
Department of Forestry and Fire Protection

Amit Gupta
Department of Industrial Relations

Dan Reiswig
Department of food and Agriculture

Bill Nelson
Franklin Fueling Systems

Enclosure

Drive-Off Breakaway Reconnection Procedure for the 8701VV Breakaway using EasyGrip Reconnection Tool

Use this procedure to either reconnect or disconnect (reverse order) the Healy 8701VV Breakaway as part of Section 1.4 Procedure for Reconnecting Breakaway and Testing Fueling Point after Drive-Off in the Healy Systems Scheduled Maintenance.

Note: Breakaway Reconnections must be logged in the GDF Maintenance Log.

TOOLS NEEDED:

- EasyGrip Reconnection Clamp


- 8 mm Hex Head Socket
- Torque wrench
- Safety Glasses

RECONNECTION PROCEDURE

1. Inspect each half of the separated breakaway for obvious damage to the outer-shell, plastic inserts or o-rings; including cracks, chips or tears that may effect reconnecting the two halves.

2. Check the shear pin bushing hole, (See Figure 1) located in the top half of the breakaway for any part of the pin left behind at separation. A gentle tap on the opposite side of the breakaway should eject the pin.

Figure 1

3. After completing inspection, lightly lubricate the main o-ring on the top half of the breakaway (See Figure 1). Any weight motor oil is acceptable.

4. With the EasyGrip in its full open position, place the top portion of the breakaway into the top side of the EasyGrip and the bottom portion of the breakway into the bottom side (See Figure 2).

Figure 2

5. Pull the two handles of the Easy Grip down at the same rate to slowly bring the two halves together. Check the main o-ring for position as the top and bottom of the breakaway come together. See Figure 3.

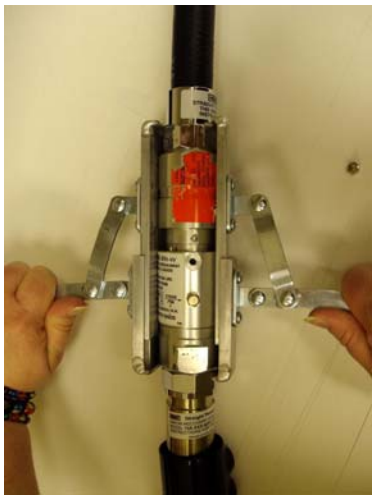

Figure 3

6. Align the dowel pin in the bottom half of the breakaway with the dowel pin guide located in the top half of the breakaway. When the dowel pin and guide are aligned, continue squeezing tool grips until the breakaway halves come together. See Figure 4

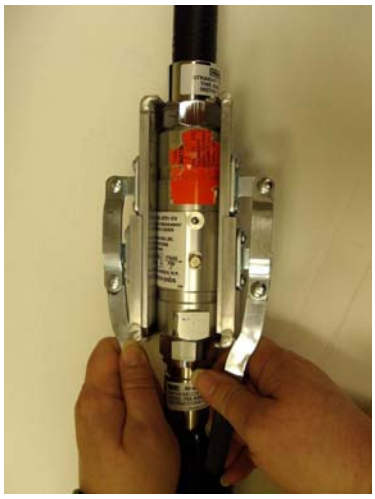

Figure 4

Caution: Reconnection can cause a small amount of gasoline to leak out of the breakaway. A towel placed in front of the reconnection zone of the breakaway can help to minimize fuel spills.

7. Remove the shear pin (#787) located in the spare shear pin location of the breakaway and install in place of the original. See Figure 5

Figure 5

8. Torque the shear pin to 20 inch-pounds (~ 1.5 ft-lbs).
   DO NOT OVER-TIGHTEN

9. If available, install a shear pin (#787) in the spare shear pin location.

10. Remove the Easygrip.

11. Proceed with the tests outlined in Section 1.4 of the Healy Systems Scheduled Maintenance.