



Winston H. Hickox
Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman

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Gray Davis
Governor

November 9, 2001

Dear (vapor recovery processor manufacturer):

As you know, the Enhanced Vapor Recovery (EVR) amendments require vapor recovery equipment to be certified to new standards. Several of the standards were viewed by the Air Resources Board (ARB) to be technology-forcing and were adopted with future effective dates. The Board directed staff to conduct a technology review on these future standards to assess the technological feasibility of the EVR requirements. As part of this technology review, we are contacting you to request information as to the feasibility of several standards related to vapor recovery processors.

At the first EVR Technology Review workshop held on October 9, 2001, the feasibility status of several standards pertaining to processors was presented. As the enclosed tables indicate, ARB staff have data demonstrating that almost all the requirements are met by currently certified systems. However, we are still evaluating whether the standards for the maximum A/L ratio of 1.3 for a system with a processor and the maximum hydrocarbon emission rate of 5.7 lbs/1000 gallons are achievable by the April 2003 effective date.

We are requesting any data or information you can provide as to the technological feasibility of these standards. We will honor your request to keep sensitive material confidential. We would appreciate this information by December 6, 2001, so that we can include your input into the draft technical review report scheduled for release in January 2002. The next workshop will be held on February 5, 2002.

We look forward to working with you in evaluating the EVR standards. You can download materials relating to the EVR Technical Review at www.arb.ca.gov/vapor/vapor.htm. If you have questions, please contact Cindy Castronovo at (916) 322-8957 or ccastron@arb.ca.gov.

Sincerely,

ORIGINAL SIGNED BY

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

Enclosure

*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

Phase II Standards

Standard/Specification	Feasibility Status
Static Pressure Performance	Yes
Liquid Removal (5 ml/gal)	Yes
Nozzle/Dispenser Compatibility	Yes
Unihose MPD Configuration	Yes

Phase II Standards

Standard/Specification	Feasibility Status
Vapor Piping Requirements (slope, diameter, etc.)	Yes
Liquid Condensate Traps	Yes
Leak-tight Connectors and Fittings	Yes
Dynamic Pressure Drop	Yes
Max. A/L of 1.00 for System Without Processor	Yes

Phase II Standards

Standard/Specification	Feasibility Status
HAPs from Destructive Processors 1.2 lbs/yr 1,3-butadiene	Yes
84 lbs/yr acetaldehyde	Yes
36 lbs/yr formaldehyde	Likely
UST Pressure Criteria Daily avg $\leq +0.25$ in water Daily high $\leq +1.5$ in water Non-excluded hours = 0 ± 0.05 in	Yes

Phase II Standards

Standard/Specification	Feasibility Status
Phase II Emission Factor (incl. pressure-related fugitives)	Likely
Phase II Compatibility with Phase I Systems	Likely
Balance System Component Pressure Drops	Likely

Phase II Standards

Standard/Specification	Feasibility Status
Max. A/L Ratio of 1.30 for System with Processor	Maybe
Max. HC Rate to Processor	Maybe