



Winston H. Hickox
Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman

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Gray Davis
Governor

April 7, 2003

To: All Vapor Recovery Manufacturers/Stakeholders:

California Air Resources Board (ARB) staff is proposing to exempt some Phase I vapor recovery components from the identification requirements as specified in Section 9.4.1 of **CP-201, Certification of Vapor Recovery Systems for Gasoline Dispensing Facilities** (amended July 2002). The requirement is specified as follows:

“All components for vapor recovery systems shall be permanently identified with the manufacturer’s name, part number, and a unique serial number. This requirement does not apply to replacement subparts of the primary component. Specific types of components may be exempted from this requirement if the Executive Officer determines, in writing, that this is not feasible.”

We have determined that the requirement is not feasible for some Phase I components. We also identified some components that are currently included in the certification Executive Order (EO) parts lists, which either do not need to be included, or to which this requirement does not apply. The following table lists all these components with comments identifying those we propose to either exempt or eliminate from the list.

ARB staff recognizes that it may take time for equipment manufacturers to implement this requirement. We are proposing that compliance with CP-201 Section 9.4.1 requirements must be achieved within 90 days after the list is final.

We would appreciate your comments and suggestions on the proposed changes. Please provide a written response no later than May 15, 2003. Written comments should be submitted to George Lew by mail, email or fax:

George Lew, Chief
Engineering and Certification Branch
Monitoring and Laboratory Division
P.O. Box 2815
Sacramento, CA 95812
glew@arb.ca.gov
Fax: (916) 327-8217

A copy of this letter, as well as written comments and our responses will be posted on the ARB Vapor Recovery web site at www.arb.ca.gov/vapor/vapor.htm.

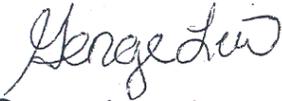
The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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If you have questions or need additional information, please contact Laura McKinney at (916) 322-2496 or via email at lmckinne@arb.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "George Lew".

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

cc: Teresa Sewell, Chair
CAPCOA Vapor Recovery Committee

Proposed Changes to Identification Requirements for Phase I Components

Component	Proposed Changes
Adaptors - Product and Vapor	
Adaptors - Automatic Tank Gauge	
Cap - Automatic Tank Gauge	
Dust Caps - Product and Vapor	
Drop Tube	Manufacturer name, part number and unique serial number not required. Not feasible.
Extractor Assembly	Requirements do not apply. No impact on performance of vapor recovery system. Do not require listing in certification Executive Orders.
Installation Tools	
Jack Screw (OPW)	
Jam Nut (CNI)	
Overfill Prevention Device Ball Float Type	
Overfill Prevention Device Drop Tube Type (Positive Shutoff)	
Pressure/Vacuum Vent Valve	
Spill Container Drain Valve	
Spill Container (except drain valve)	No impact on performance of vapor recovery system. Serial number not required unless drain valve is integral to container.
Spill Container Lids	Requirements do not apply. Listed in certification EO because type evaluated for effect on drain valve performance.
Tank Bottom Protector	Requirements do not apply. No impact on performance of vapor recovery system. Listed in certification EO because design may affect ability to measure distance between highest opening at bottom of drop tube and tank bottom.