

# OPW®

A DOVER RESOURCES COMPANY



STATE OF CALIFORNIA  
AIR RESOURCES BOARD  
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15-Day Comment

TAC  
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Board Secretary  
California Air Resources Board  
P.O. Box 2815 2020 L Street  
Sacramento, CA 95812

September 21, 1995

**SUBJECT:** Comments on Board Resolution 95-27 *The Certification and Test Procedures for Gasoline Vapor Recovery Systems*

Thank you for the opportunity to submit the following comments pertaining to the subject material.

- TP-201.5 Determination (by Volume Meter) of Air to Liquid Ratio of Vapor Recovery Systems of Dispensing Facilities  
Section 8.3 Compliance Test Instructions In (2)(a) and (2)(b) which addresses the interpretation of the A/L test results, there is in the statements "...the *nozzle* complies." or "... the *nozzle* does not comply." This implies that only the nozzle affects the A/L of the system and will result in the expense of the replacement of "good" nozzles where the actual problem may be another component. There are many other components of the system that affect the A/L such as the hose, vapor pump, and etc. As worded it implies that the replacement of a nozzle will result in an acceptable A/L and this is not the case. Therefore, it is suggested that the word "*nozzle*" be replaced with the word "*system*" in those sections so that the statement would read "...the *system* complies." or "...the *system* does not comply.". This would be a more appropriate interpretation of the test results.

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**Quality Statement**

OPW Fueling Components will provide defect-free products and services meeting the requirements of our customers and each other

- TP-201.2  
It would seem appropriate to update Figure 6, Figure 7, Figure 8, and Figure 10 to the current acceptable sleeve configuration that has been used for numerous efficiency tests rather than to show an obsolete design. In section 5.1.3.1 the references to the sleeve (Figures 4A through 4C) do not agree with the actual figure designations.
- TP-201.3  
If this procedure is to be used for systems with a P-V vent and the intent is to permit the testing at 2 inches WC so that the P-V vent will not have to be removed, it would seem that Figures 1 and 3 are not applicable. It is suggested they be removed.

Sincerely,

*Donald L. Leininger*  
Donald L. Leininger, P.E.  
Technical Liaison Manager



STATE OF CALIFORNIA  
AIR RESOURCES BOARD  
RECEIVED 9/26/95  
BY BOARD SECRETARY

September 25, 1995

Ms. Pat Hutchens  
Board Secretary  
California Environmental Protection Agency  
Air Resources Board  
P.O. Box 2815  
Sacramento, California 95812

Fax # 916-322-4737

15 Day Comment  
TAC  
legal  
MLD

Dear Ms. Hutchens,

Following are our written comments on the modifications approved by the Board, to the certification procedures and test methods released on 5/12/95, for gasoline vapor recovery systems.

CP 201, page 28:

We believe the vapor valve flow rate shown at a pressure of 27" WCI is incorrect, and probably should be; .0023 CFM @ +27" WCI.

TP-201.3, page 5, paragraph 3.5 and 3.6:

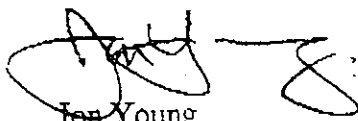
The requirement to install expensive isolation valves is not necessary in the Hasstech incinerator systems. Simply removing power from the system will prevent any system valves from opening, at which time a pressure decay test may be conducted. This should be changed to be more system specific.

TP-201.5 page 8, paragraph 11.2:

On incinerator equipped systems such as the Hasstech **VacuRite**, the allowable A/L range can be stated as a **minimum** only rather than a mean +/- 10% of the mean. This minimum A/L ratio approach is shown in Executive Order G-70-164, exhibit 2, page 3. The reason the minimum is appropriate is due to the incinerator which accommodates any excess air ingested with higher A/L values. Providing a minimum only should make field compliance testing easier.

Thank you for the opportunity to comment on these modifications.

Sincerely,



Jon Young  
President

# Gilbarco Inc. Facsimile Cover Sheet

**To:** Laura McKinney  
**Company:** Cal. ARB California Air Resources Board  
**Phone:** 916 327 1525  
**Fax:** 916 445 5745

*Late Comment*

**From:** Ken Pope  
**Phone:** 910 547 5028  
**Fax:** 910 292 8871

**Date:** 01/17/96

**Pages including this  
cover page:** 1

## Comments: Laura,

While looking through the Vapor Recovery Certification and Test Procedures Proposed "Fifteen Day Changes" for June 20, 1995 Public Hearing, I noticed a proposed addition to page 28 section 4.2.4.1 numbers (2) and (3) of CP-201 that I had not noticed before. This addition is a new flow versus pressure performance specification for vapor return valves of [0.000083 CFM @  $\geq +27.00$  "WC] for positive and negative gauge pressure.

My concern is that the VaporVac vapor valve, due to its design, will not hold + 27.00 "WC applied to the valve outlet, i.e. the vapor pump / UST side of the valve. It is designed to remain sealed up to + 15.00 "WC. It will however, remain sealed under a - 27.00 " WC vacuum applied to the valve outlet as this vacuum will cause the valve disk to be pulled down against the seat.

I talked to Craig Hartsell and he said you had already suggested a change to this performance specification to James Loop.

Could you let me know what the status and latest wording is on this performance spec.?

Thanks



CC: C. Hartsell, E. Rima