



Linda S. Adams
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chairman
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Arnold Schwarzenegger
Governor

November 27, 2007

07-09

Glenn K. Walker
President
Vapor System Technologies
650 Pleasant Valley Drive
Springboro, Ohio 45066

Dear Mr. Walker:

In response to your request, the California Air Resources Board (ARB) has determined that the Vapor System Technologies (VST) enhanced vapor recovery (EVR) hanging hardware components (balance nozzle, curb hose, break away, and whip hose) identified in Exhibit 1 of Executive Order VR-203-A and listed in Table 1 are compatible replacement parts for pre-EVR balance vapor recovery systems listed in Table 2.

Table 1
VST Hanging Hardware

| Component | Model Number |
|--------------------|--------------|
| Nozzle | VST-EVR-NB |
| Breakaway Coupling | VSTA-EVR-SBK |
| Coaxial Curb Hose | VDV-EVR |
| Coaxial Whip Hose | VSTA-EVR |

The components have been evaluated according to the criteria of Sections 18.1 and 19.1, 4 of CP-201, **Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities**. Based on the results of the EVR operational tests, ARB staff has determined that these replacement parts, when installed according to the manufacturer's installation and maintenance instructions, will not adversely affect the performance of the vapor recovery system.

Criteria for both system compatibility and commercial availability are included in Section 19.1 of ARB's CP-201. Please note that ARB staff has determined that the VST EVR hanging hardware components are compatible with and meet the operative standards and specifications of pre-EVR balance systems. However, ARB staff is not at this time providing a determination that the VST EVR components are commercially available. Please note that a compatibility determination means that a gasoline dispensing facility (GDF) operator **may** install VST EVR components as replacement parts for a pre-EVR vapor recovery system, but is **not required** to install them as replacement parts.

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

VST's EVR nozzle, coaxial curb hose, coaxial whip hose and breakaway coupling listed in Table 1 are approved for use as replacement parts for the pre-EVR Phase II ORVR compatible balance vapor recovery systems listed below by Executive Order numbers. Until April 1, 2009, these VST components are approved replacement components for systems listed in Table 2.

Table 2
 Pre-EVR Balance Systems

| Executive Order Number | Description |
|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| G-70-17-AD | Modification of Certification of the Emco Wheaton Balance Phase II Vapor Recovery System |
| G-70-23-AC | Recertification of the Exxon Balance Phase II Vapor Recovery System |
| G-70-25-AA | Recertification of the Atlantic Richfield Balance Phase II Vapor Recovery System |
| G-70-36-AD | Modification of Certification of the OPW Balance Phase II Vapor Recovery System |
| G-70-38-AB | Recertification of the Texaco Balance Phase II Vapor Recovery System |
| G-70-48-AA | Recertification of the Mobil Oil Balance Phase II Vapor Recovery System |
| G-70-49-AA | Recertification of the Union Balance Phase II Vapor Recovery System |
| G-70-52-AM | Certification of Components for Red Jacket, Hirt, and Balance Phase II Vapor Recovery System |
| G-70-53-AA | Recertification of the Chevron Balance Phase II Vapor Recovery System |
| G-70-125-AA | Modification of the Certification of the Husky Model V Phase II Balance Vapor Recovery Nozzle |
| G-70-134 | Certification of the EZ Flo Rebuilt A-4000 Series and 11V-Series Vapor Recovery Nozzle |
| G-70-170 | Certification of the EZ-Flo Rebuilt 5005 and 5015 Nozzles for use with the Balance Phase II Vapor Recovery System |

Please note that the outside of the VST EVR curb hose is marked to locate the pick up point for the liquid removal device. It is the responsibility of the installer to insure that a properly sized and marked curb hose is installed. Please refer to [Section 12 of ARB Approved Installation, Operation and Maintenance Manual for the VST Phase II EVR System](#) for hose installation guidelines. Also be aware that the position of the dispenser nozzle hook may need to be adjusted when a VST EVR nozzle is installed in a pre-EVR system.

All VST EVR hanging hardware components installed on a GDF permitted under Executive Order G-70-52AM shall be subject to all the same testing requirements

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applicable to the components listed in Exhibit 2 of G-70-52AM and those sections of the Vapor Recovery Equipment Defects (VRED) list applicable to Executive Order G-70-52AM.

When the dynamic backpressure test procedure, ARB TP- 201.4, is run, the vapor recovery system must meet the following pre-EVR requirements:¹

0.15 in WC at 20 cubic feet per hour (CFH)
0.45 in WC at 60 CFH
0.95 in WC at 100 CFH

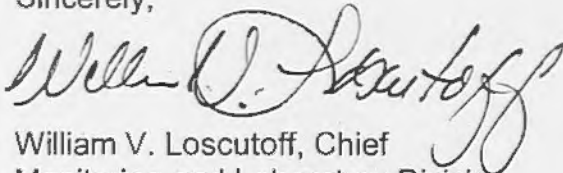
If the liquid removal test, ARB TP-201.6C, is conducted on a hanging hardware assembly with a VST EVR balance nozzle, the following procedures should apply when draining gasoline from the hose:

- VST's spout plug, P/N VST-STP-100, must be used to plug the spout;
- Do not activate the dispenser;
- And engage the nozzle lever. (The VST-EVR-NB nozzle has a lever-actuated vapor valve.)

When the VST EVR curb hose is used as a component, the pick up point mark of the liquid removal device must be at the bottom of the hose loop during the liquid removal test.

If you have further questions or need further information, please contact Frances Cameron at (916) 445-9314 or via email at fcameron@arb.ca.gov, or Pat Bennett at (916) 322-8959 or via email at pbennett@arb.ca.gov.

Sincerely,



William V. Loscutoff, Chief
Monitoring and Laboratory Division

cc: See next page

¹ The exception is the Exxon balance system, (EO G-70-23-AC), with the limits: 0.16 in WC at 40 CFH, 0.35 in WC at 60CFH, and 0.62 in WC at 80 CFH.

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