Comment 1 for Gasoline Vapor Recovery Systems (vrdef11) - 45 Day.

First Name: randy
Last Name: smith
Email Address: randy.smith@sdcounty.ca.gov
Affiliation: San Diego APCD

Subject: T 17 Request for Change
Comment:

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Hi Ranjit,
Please consider this as a CAPCOA comment requesting a change in T17
as part of the regulatory review in response to ongoing discussions
with ARB on EO 203/204-K (comment #23).  Specifically, there is a
reference in the EO to GDF-09 that should be amended or the test
procedure itself should be revised.  I don't believe GDF-09 is
current in that it references pre-EVR nozzles (the Emco Wheaton
referenced in the EO is EVR) and includes a wet test that is not
necessary based on the design of the nozzle and statements made
from the manufacturer during recent training sessions attend by SD
Staff.  George Lew believes it would be easier to change the TP
rather than the EO and suggested I send you this request.  There is
a veiled reference to nozzles not cited in section 5.1 of the TP
but even that section does not clearly or adequately address the
issue in a reasonable manner considering the design of the
insertion interlock nor would it be practical for station operators
or district staff to perform.  Please feel free to contact me
should you have any questions or assistance in revising the TP.
Thanks!
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Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2011-06-21 15:30:40

No Duplicates.

Comment 2 for Gasoline Vapor Recovery Systems (vrdef11) - 45 Day.

First Name: John
Last Name: Fecteau
Email Address: jfecteau@veeder.com
Affiliation: Veeder-Root

Subject: VRED List Comments
Comment:

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Please see attached file.
Copy of letter and comments also sent by post.
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Attachment: 'www.arb.ca.gov/lists/vrdef11/6-vred_comments_vr.pdf'

Original File Name: VRED Comments VR.pdf

Date and Time Comment Was Submitted: 2011-07-29 11:00:46

No Duplicates.

There are no comments posted to Gasoline Vapor Recovery Systems (vrdef11) that were presented during the Board Hearing at this time.