



March 27th, 2023

George Lew
California Air Resources Board
Engineering and Certification Branch Chief
Monitoring and Laboratory Division
1927 13th Street
P.O. Box 2815
Sacramento, CA 95812

Subject: Vapor Recovery Procedures – Additional Amendment Proposal

Dear Mr. Lew,

Since the Air Resources Board is currently requesting public comment on proposed amendments to the vapor recovery certification procedures, Husky would like to take this opportunity to propose an idea for an additional future amendment to enhance the reliability of all certified vapor recovery systems which would ultimately benefit the public and all those who provide and maintain vapor recovery system equipment. The idea is to require manufacturers to be ISO 9001:2015 certified just like the automotive industry who recently expanded to IATF 16949:2016 from ISO/TS 16949:2009 for their Quality Management System. You may ask how does this improve equipment reliability. Allow me to explain.

A simple analogy to explain ISO 9001 would be the value an Underwriters Laboratory (UL) Listing adds to a consumer product. When a product passes a set of industry accepted safety standard tests, UL “Lists” the product allowing it to carry their mark of approval. Likewise, when a manufacturing company passes an external audit of the ISO 9001:2015 Standard for a Quality Management System, they become an ISO “Certified” company. A Quality Management System includes such things as procedures for manufacturing process control to ensure the listed product is manufactured consistently. The more a product is manufactured consistently, the less likely a product would be subject to recalls and warranty claims which creates frustration for all who provide and maintain vapor recovery equipment.

Requiring vapor recovery equipment to be made by ISO certified manufacturers would take some time to implement. However, with a well development phase in plan, California vapor recovery equipment could soon experience the same reliability as vehicles bought at a dealership.

We look forward to your thoughts for and against this idea to better serve customers in California and all those who rely on CARB certifications. If you have any questions, please feel free to contact me.

Sincerely,

Grenville Sutcliffe
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