

California Environmental Protection Agency



# Air Resources Board

## Addendum to the Final Statement of Reasons for Rulemaking

### AMENDMENTS TO THE LIST OF EQUIPMENT DEFECTS THAT SUBSTANTIALLY IMPAIR THE EFFECTIVENESS OF GASOLINE VAPOR RECOVERY SYSTEMS

Addendum Prepared: July 26, 2012

#### I. BACKGROUND

On June 14, 2012, the Air Resources Board (ARB or Board) staff submitted the Final Statement of Reasons (FSOR) and the Final Regulation Order amending section 94006(b) and the Vapor Recovery Equipment Defect (VRED) List (first adopted September 23, 2002 and last amended June 7, 2008) that is incorporated by reference therein.

This Addendum to the FSOR for the 2012 Amendments to the List of Equipment Defects that Substantially Impair the Effectiveness of Gasoline Vapor Recovery Systems, describes, and provides reasoning for the nonsubstantial changes that ARB staff made to FSOR, Final Regulation Order, and VRED List. The changes made do not materially alter any requirement, right, responsibility, condition, prescription, or other regulatory element of any CCR provisions. All of these changes were made in response to concerns raised by OAL, as well as additional typographical errors subsequently discovered.

ARB staff is submitting this addendum to the FSOR for insertion in OAL File Number 2012-0614-01S.

#### II. ADDITIONAL MODIFICATIONS

##### Nonsubstantive Change Typographical Error in the Vapor Recovery Equipment Defects List

1. On page 16, Part iii example: (bottom of page) ARB staff deleted "VR-204 series VST Phase II EVR System Including ISD." That phrase was inadvertently duplicated from the heading on the next page.
2. ARB staff provided Verification Procedures which are referenced in the current regulation. These Verification Procedures are, and at all times

during this rulemaking, were available to the public. The following Verification Procedures were inadvertently included in the file but should be removed because they are currently referenced in the regulation:

- i. TP 201.3 Determination of 2-Inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities
- ii. TP 201.4 Dynamic Back Pressure
- iii. TP 201.5 Determination (by Volume Meter) of Air to Liquid (A/L) Volume Ratio of Vapor Recovery Systems of Dispensing Facilities
- iv. GDF-01 Bag Test for Multi-Nozzle Vacuum Assist Systems
- v. GDF-02 Bag Test for Single-Nozzle Vacuum Assist Systems
- vi. GDF-09 Phase II Balance System Nozzle Insertion Interlock Operation Determination
- vii. Method 9 40 Code Federal Regulations Part 60 Appendix A: Reference Method 9 / EPA Section 3.12 Visible Determination of the Opacity of Emissions from Stationary Sources
- viii. EPO No. 26-F-1 Vapor Recovery Systems Field Compliance Testing
- ix. G-70-187 Exhibit 5 Fillneck Vapor Pressure Regulation Fueling Test
- x. G-70-191 Exhibit 2 Specifications for the Healy ORVR Phase II Vapor Recovery System (4.a 4.d)
- xi. G-70-191 IOMM Healy Systems VP1000 Dispenser Mounted Vacuum Pump Installation & Service Guide, Scheduled Maintenance Instructions, Weekly Inspection, bullet 4 et Seq.
- xii. G-70-204 Exhibit 2 System Specifications/Vaporsaver (1.A - 1.D)
- xiii. G-70-209 Exhibit 5 Determination (by Volume Meter) of Air to Liquid Volume Ratio of Vapor Recovery Systems of Dispensing Facilities, Adopted April 12, 1996
- xiv. VR-201 Exhibit 4 Determination of Static Pressure Performance of the Healy Clean Air Separator
- xv. VR-201 Exhibit 5 Vapor to Liquid Volume Ratio for Healy Phase II EVR System
- xvi. VR-201 Exhibit 7 Nozzle Bag Test Procedure
- xvii. VR-202 Exhibit 4 Determination of Static Pressure Performance of the Healy Clean Air Separator
- xviii. VR-202 Exhibit 5 Vapor to Liquid Volume Ratio for Healy Phase II EVR System
- xix. VR-202 Exhibit 7 Nozzle Bag Test Procedure

- xx. VR-203 Exhibit 2 System Specifications
- xxi. VR-203 Exhibit 5 Liquid Removal Test Procedure (sections 6.1 to 6.5)
- xxii. VR-203 Exhibit 10 Nozzle Bag Test Procedure
- xxiii. VR-203 Exhibit 9 Determination of VST ECS Processor Activation Pressure

3. In the VRED List table, Defect Identification Methods Specified in the Verification Procedure Column of the Vapor Recovery Defects List, the following changes were made:
  - i. Deleted reference to Exhibit 13 in VR-203 and VR-204 because it is not a defect verification procedure.
  - ii. Deleted reference to Exhibit 8 in VR-208 because it is not a defect verification procedure.

### **III. CONCLUSION**

For the foregoing reasons, ARB staff believes that the above modifications do not materially alter the requirements, rights, responsibilities, conditions, prescriptions, or other regulatory element of any CCR provisions. Therefore, these changes are nonsubstantial in nature.