Cal/EPA
California Environmental Protection Agency

Air Resources Board
P.O. Box 2815
2020 L Street
Sacramento, CA
95812-2815

Pete Wilson
Governor

Secretary for Environmental Protection

September 16, 1997

Mr. Ken Kunaniec
Engineering Manager, Source Test Section
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, California 94109

Dear Mr. Kunaniec:

Equivalency of BAAQMD Test Procedures

Thank you for your September 11, 1997 letter requesting an equivalency determination for several of your vapor recovery test procedures. As you know, many of our procedures have more than one set of applicabilities and instructions, all of which are considered equivalent to each other. Therefore, in making a determination of equivalency of your procedures to ours, we verified that at least one set of your applicabilities and instructions matched one set of ours. In cases where your test methods contained procedures that are not present in the ARB methods, we performed an engineering evaluation and concluded that these procedures were acceptable as well. In fact, we hope to add similar procedures in our next revision of the ARB certification and test procedures.

Thus, we have determined that BAAQMD ST-27, ST-30, ST-36, ST-37, and ST-38 are considered equivalent to CARB TP-201.4, TP-201.3, TP-201.1, TP-201.6, and TP-201.3B respectively.

If you have further questions on this matter, please contact Cindy Castronovo at (916) 263-1628 or James Loop at (916) 263-2059.

Sincerely,

William V. Loscutoff, Chief
Monitoring and Laboratory Division

cc: James J. Morgester, CD

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