

UPDATED INFORMATIVE DIGEST

Sections Affected: Amendments were made to title 17, California Code of Regulations (CCR), sections 94011, 94153 and 94155 which incorporate by reference certification procedures and test procedures identified below.

Background

Health and Safety Code section 41954 requires the Air Resources Board (the "Board" or "ARB") to adopt procedures for certifying systems designed to control gasoline vapor emissions during gasoline marketing operations, including storage and transfer operations. Section 39607(d) of the Health and Safety Code requires ARB to adopt test methods to determine compliance with ARB and district non-vehicular emissions standards. The certification and test procedures related to gasoline vapor recovery are incorporated by reference in sections 94000-94015 and 94101-94162, title 17, CCR.

Vapor recovery system configurations for gasoline dispensing facilities are certified by ARB as achieving a certain level of emissions control performance. During certification tests, specifications are established for various aspects of system operation related to emissions control that reflect the tested system's operation during emissions testing. Performance checks are conducted by district staff to ensure that installed systems meet these emissions-related specifications to ensure that systems operate in a manner consistent with the certified level of emissions control performance. Certification and test procedures adopted by the board govern both certification testing and subsequent performance checks by districts.

ARB staff continually evaluates vapor recovery certification and test procedures, reviews and responds to recommendations from industry, districts and federal agencies regarding these procedures, and periodically proposes improvements and corrections as necessary.

Description of Regulatory Action

As approved by the Board, three certification and test procedures are being revised; these procedures are incorporated by reference into title 17, CCR, sections 94011, 94153 and 94155, as amended. The revised procedures are:

Method CP-201	Certification Procedure for Vapor Recovery Systems of Dispensing Facilities
Method TP-201.4	Determination of Dynamic Pressure Performance of Vapor Recovery Systems of Dispensing Facilities
Method TP-201.6	Determination of Liquid Removal of Phase II Vapor Recovery Systems of Dispensing Facilities

One procedure initially proposed for revision was withdrawn from this rulemaking. This procedure is:

Method TP-201.5 Determination (by Volume Meter) of Air to Liquid Volume Ratio of Vapor Recovery Systems of Dispensing Facilities

Need for Amendment

These amendments are part of our continuing effort to update and improve the ARB vapor recovery methods. Staff has revised existing vapor recovery system certification and test procedures to reflect advances in emission measurement technology, correct inadvertent errors, and better support effective testing of vapor recovery system performance after installation. The amendments address comments from districts and industry representatives requesting improvements and corrections as conveyed in various workshops and written communications.

The amended procedures will assist district staff in evaluating test data to demonstrate compliance with permit conditions, regulations, and other statutes.

Plain English Summary of Revisions to Existing Test Methods

All of the revisions are to existing ARB vapor recovery certification and test methods. The revisions constitute a response to reports of problems and shortcomings in existing certification and test methods reported by various parties including air pollution control districts, equipment manufacturers, and ARB testing staff. The revisions correct inadvertent errors, clarify wording which has proved subject to misinterpretation, add quality assurance checks, and improve safety in testing. The revised methods are summarized below.

Method CP-201 Certification Procedure for Vapor Recovery Systems of Dispensing Facilities

ARB Method CP-201 prescribes requirements for certification of the performance of gasoline dispensing facility (service station) vapor recovery systems including procedures for application for certification, performance standards and specifications, test procedure requirements and testing requirements. The amended procedure included a requirement for a warranty notice tag on certified equipment and specifies information to be included on the warranty notice tag. The application for certification has been revised to require additional system information from the manufacturer, such as the complete list of hanging hardware to be used with the system, rather than just the nozzle. The amended procedure clarifies that allowable pressure drop information should be provided through the system as a whole and for each system component. A new section requires documentation that the applicant has notified other manufacturers that the applicant is seeking certification of a system that uses their components.

Method TP-201.4 Determination of Dynamic Pressure Performance of Vapor Recovery Systems of Dispensing Facilities

ARB Method TP-201.4 prescribes procedures for determining the resistance of dispensing equipment to the flow of vapor simulated by a nitrogen stream. The applicability of this procedure has been clarified to show this test method is applicable to balance systems and is not to be used for assist systems. As amended, the method would allow omission of the addition of liquid gasoline to the underground piping when retesting facilities that have had no change in the underground piping since the previous test. Another revision removes the backpressure limits from the test method and instead references the back-pressure limits in certification executive orders or as specified in applicable regulations. Numerous other technical changes are made to clarify the test procedure while maintaining unchanged the principle of the test measurements.

Method TP-201.6 Determination of Liquid Removal of Phase II Vapor Recovery Systems of Dispensing Facilities

ARB Method TP-201.6 prescribes techniques for quantifying liquid removal from dispenser hoses. The applicability of this procedure has been clarified to show this test method is not to be used for vapor assist type systems. Several minor revisions were made to eliminate provisions for dynamic pressure and gasoline dispensing pressure measurements unrelated to liquid removal determination. Another revision clarifies the intent that liquid removal be determined at flow dispensing rates above 5 gallons per minute. No major revisions were made.

Comparable Federal Regulation

There are no comparable federal regulations that certify gasoline vapor recovery systems for service stations. There are no comparable federal test methods to determine compliance with vapor recovery system requirements. ARB procedures applicable to such vapor recovery systems have an impact nationwide as ARB certifications and test procedures are recognized and used in other states.