



Linda S. Adams
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov



Arnold Schwarzenegger
Governor

April 8, 2009

09-01

Mr. Glenn K. Walker
President
Vapor System Technologies
650 Pleasant Valley Drive
Springboro, Ohio 45066

Dear Mr. Walker:

**PRE-ENHANCED VAPOR RECOVERY (EVR) PHASE II BALANCE
COMPONENTS MAY BE USED TEMPORARILY AS REPLACEMENT
COMPONENTS FOR VAPOR SYSTEM TECHNOLOGIES (VST) EVR PHASE II
AND PRE-EVR PHASE II BALANCE SYSTEMS**

VST has reported that there is up to a seven week backlog of orders for VST EVR Phase II hanging hardware. In response to this backlog, the California Air Resources Board (ARB) temporarily approves the use of pre-EVR components as replacement parts. VST EVR whip hose, curb hose, breakaway or nozzle specified in Executive Orders VR-203 and VR-204 may be temporarily replaced by the corresponding coaxial balance components listed for Executive Order G-70-52-AM. These pre-EVR balance components were determined to be compatible with the VST EVR components in ARB's Approval Letter # 08-01 dated November 27, 2007. Note that only coaxial liquid removal hoses are acceptable replacement parts for the VST EVR curb hose. This approval will apply to the following:

1. Facilities that have completed installation of VST Phase II EVR system (Executive Order VR-203 or VR-204).
2. Facilities located in air districts which are currently in attainment of state ozone standard. These air districts include the counties of Lake, Mendocino, Del Norte, Humboldt, and Trinity.
3. Facilities located in air basins that are not designated nonattainment for ozone, have an annual throughput of 240,000 gallons of gasoline or less, and are in counties with a population of less than 100,000. These air basins include the counties of Alpine, Lassen, Modoc, Plumas, and Sierra.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

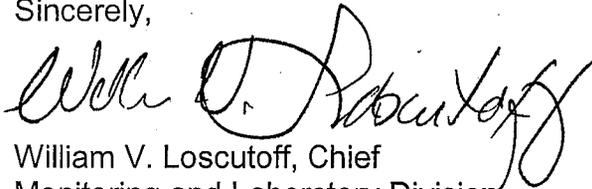
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4. Facilities located in air districts that were designated nonattainment for ozone effective 2007. These air districts include the counties of Northern Sonoma, San Luis Obispo, and Siskiyou.

In order for a gasoline dispensing facility (GDF) operator of one of the above facilities to install a pre-EVR replacement component, the operator must obtain a letter from two equipment suppliers stating that the ordered balance EVR component will not be delivered for at least two weeks. A copy of the letter shall be maintained at the location of each GDF and be made available to district inspectors. The pre-EVR replacement components covered by this letter may remain in service until March 31, 2010. By April 1, 2010, GDF operator shall remove the pre-EVR component and replace it with an EVR component listed in Exhibit 1 of Executive Orders VR-203 or VR- 204.

If you have questions or need further information regarding this letter, please contact Pat Bennett at (916) 322-8959 or via email at pbennett@arb.ca.gov, or George Lew at (916) 327-0900 or via email at glew@arb.ca.gov.

Sincerely,



William V. Loscutoff, Chief
Monitoring and Laboratory Division

cc: Terry Dressler
Santa Barbara County Air Pollution Control District

Robert Kard
San Diego County Air Pollution Control District

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Sacramento Metropolitan Air Quality Management District

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California Air Pollution Control Officers Association

Jim Swaney
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Bay Area Air Quality Management District

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