



Air Resources Board



Matthew Rodriguez
Secretary for
Environmental Protection

Mary D. Nichols, Chair
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Edmund G. Brown Jr.
Governor

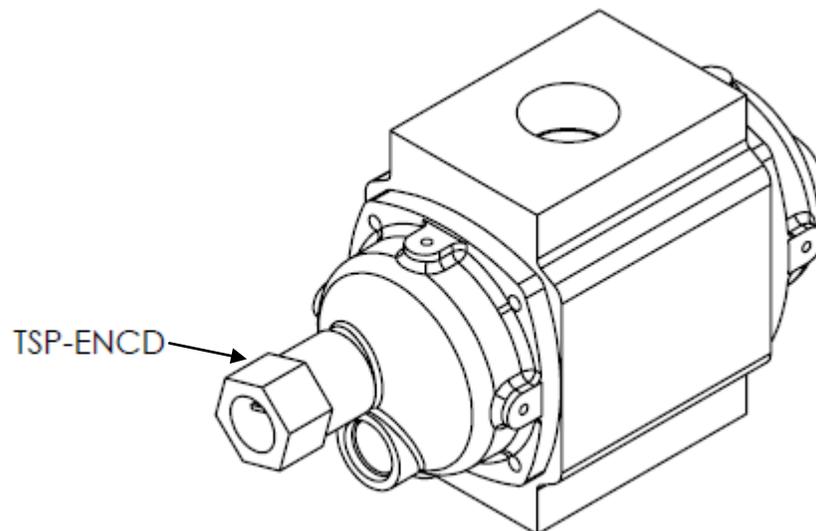
April 8, 2016

Mr. Randall Boucher
Franklin Fueling Systems
34 Spring Hill Road
Saco, Maine 04072

Dear Mr. Boucher:

Thank you for your letter in which Franklin Fueling Systems (FFS) requested the California Air Resources Board's (ARB) approval of an alternate potting material to be used in the production of the TS-VFM (Vapor Flow Meter) of the INCON In Station Diagnostic (ISD) System. The Vapor Flow Meter is listed as a certified component in Executive Orders (EO) VR-202 and VR-204, the Assist Phase II Enhanced Vapor Recovery (EVR) System and the Balance Phase II EVR System, respectively. The request is to change the potting material that is used to hold the electronics in the encoder housing (TSP-ENCD) which is attached to the TS-VFM. The current potting encapsulate has been obsoleted by the manufacturer. The color of the obsoleted potting material is blue and the requested alternate potting material is black.

INCON TS-VFM (Vapor Flow Meter)



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

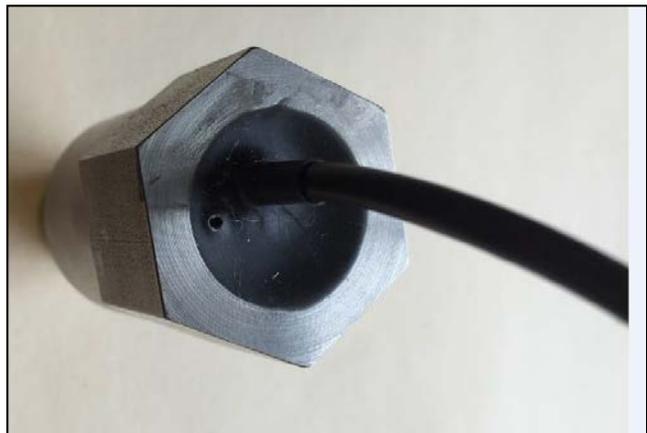
The request included an engineering drawing of the TSP-ENCN housing, a production TSP-ENCN housing with the alternate potting material for ARB staff chain of custody storage, potting material data sheets, pictures of the current potting encapsulate and alternate potting encapsulate, and diagrams of the TS-VFM with the attached TSP-ENCN housing.

ARB staff has conducted an engineering evaluation as required in Section 18.2 of the Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities (CP-201) and has determined that the potting encapsulate material change will not adversely affect the performance of the INCON ISD system when used with either the Assist Phase II EVR Systems or Balance Phase II EVR Systems. ARB staff research, including reviewing literature provided by FFS, indicates that the blue and black potting materials have similar physical properties and are approved to Underwriters Laboratories (UL) 94 standards.

Obsoleted Blue Potting Material



Alternate Black Potting Material



Amendments to EOs VR-202 and VR-204 are not required for this potting material change since the model of the INCON ISD vapor flow meter remains the same and because those EOs and ARB approved Installation, Operation and Maintenance Manuals do not reference the color of the potting material. In addition, there are no changes to the TS-VFM installation or maintenance instructions. To ensure this change does not have any unintended consequences, ARB staff may conduct in-use evaluations at any time of the vapor flow meter with the alternate potting material.

Mr. Randy Boucher
April 8, 2016
Page 3

As required by CP-201 and State law, ARB cannot certify the alternate potting material unless the following State agencies have provided an approval/determination. The following table shows the date of those agencies granting their approval or determination.

**Agency Approval or Determination of the Alternate Potting Material
for the Vapor Flow Meter**

Agency	Office of the State Fire Marshal (Department of Forestry and Fire Protection)	Division of Occupational Safety and Health (Department of Industrial Relations)	Division of Measurement Standards (Department of Food and Agriculture)	Division of Water Quality (State Water Resources Control Board)
Approval/ Determination Date	02/29/2016	01/22/2016	01/07/2016	03/22/2016

With this letter, FFS can begin marketing the TS-VFM and TSP-ENCD with the requested material change. If you have any questions, please contact either Mr. Fred Medina at (916) 324-1003 or via email at frederick.medina@arb.ca.gov, or Mr. Pat Bennett at (916) 322-8959 or via email at pat.bennett@arb.ca.gov.

Sincerely,



Michael T. Benjamin, Chief
Monitoring and Laboratory Division

cc: See next page.

Mr. Randy Boucher
April 8, 2016
Page 4

cc: (via email)

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South Coast Air Quality Management District

Magen Holloway
Bay Area Air Quality Management District

Roseana Brasington
Mojave Desert Air Quality Management District

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State Water Resources Control Board

James Parsegian
Department of Forestry and Fire Protection

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