

## Air Resources Board

## Alan C. Lloyd, Ph.D. Chairman



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

March 3, 2004

Mr. Glenn Walker President Vapor Systems Technologies, Inc. 2030 Webster Street Dayton, Ohio 45404

Dear Mr. Walker:

Thank you for your letter dated February 20, 2004, regarding the use of California Air Resources Board (ARB) certified VST hoses and breakaways on the Healy Phase II Vapor Recovery system certified by Executive Order G-70-191-AA.

When the ARB certifies a vapor recovery system, the components approved for use with this system are listed under Exhibit 1 of the Executive Order. In addition to the list of certified components, there is additional provisional language that allows the use of other certified equipment that may not appear in the list. This provisional language allows for equipment that has undergone testing subsequent to the issuance of the Executive Order. The VST hoses and breakaways for the Healy system were approved by Approval Letters 94-28 issued on November 8, 1994 and 97-05 issued on May 28, 1997, respectively. These approval letters can be found in the ARB vapor recovery web page at <a href="http://www.arb.ca.gov/vapor/letters.htm">http://www.arb.ca.gov/vapor/letters.htm</a>.

The original Executive Order G-70-190 for the Healy 800 Phase II vapor recovery system did contain the following language:

"OR

Any inverted coaxial hose, CARB –certified for use with the Healy ORVR Phase II Vapor Recovery System.

Any breakaway coupling with a vapor valve which is CARB-certified for use with the Healy ORVR Phase II Vapor Recovery System"

The omission of this language from the amended Executive Order, G-70-191-AA, was an oversight on the part of the ARB and others who reviewed this Executive Order prior

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: <a href="http://www.arb.ca.gov">http://www.arb.ca.gov</a>.

California Environmental Protection Agency

Mr. Glenn Walker March 3, 2004 Page 2

to issuance. Unfortunately, this has had an adverse impact on the some end users in the South Coast Air Quality Management District (SCAQMD).

Hoses and breakaways require ARB certification. Once certified, they remain certified unless they have been formally decertified. The VST VSTaflex Healy style inverted coaxial hose assembly and the VST-H-SBK breakaways have not been decertified and are still approved for use with the Healy systems.

If you have questions or need further assistance, please contact Ranjit Bhullar at (916) 327-8528 or via email at <a href="mailto:rbhullar@arb.ca.gov">rbhullar@arb.ca.gov</a>, or Paul Thalken at (916) 445-9499 or via email at <a href="mailto:pthalken@arb.ca.gov">pthalken@arb.ca.gov</a>.

Sincerely,

William V. Loscutoff, Chief

Monitoring and Laboratory Division

CC:

Mr. Lou Roberto, South Coast AQMD

Mr. Ben Shaw, South Coast AQMD

Mr. John Schroeder, San Joaquin Valley APCD

Mr. Paul Bauer, Healy System, Inc