Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Terry Tamminen
Agency Secretary

Arnold Schwarzenegger
Governor

October 4, 2004

Mr. Thomas A. Driscoll
Senior Environmental Scientist
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 TW Alexander Drive (D243-02)
Research Triangle Park, North Carolina 27709

Dear Mr. Driscoll:

Thank you for the opportunity to provide comments on the Stage II Vapor Recovery Systems Issues Paper dated August 12, 2004 and also for making the September 20, 2004 meeting on the issue paper available via conference call. We are supportive of your efforts to clarify the Clean Air Act requirements regarding continued use of Stage II vapor recovery in conjunction with the growing population of vehicles equipped with Onboard Refueling Vapor Recovery (ORVR). We also are interested in further efforts to improve emission factors associated with use of these vapor recovery systems.

Our comments on the issue paper are enclosed. If you have questions, or wish to discuss further, please contact Cindy Castronovo, of my staff, at (916) 327-0900 or via email at ccastron@arb.ca.gov.

Sincerely,

George Lew, Chief
Engineering and Certification Branch
Monitoring and Laboratory Division

Enclosure

California Air Resources Board (ARB) Comments on August 12, 2004 USEPA Stage II Issue Paper

Defining "Widespread Use:"

The Clean Air Act allows USEPA to revise or waive Stage II vapor recovery for "serious" or worse non-attainment areas once USEPA determines ORVR systems are in "widespread use" in the vehicle fleet. How to determine "widespread use" is the main focus of the issue paper. Our understanding is that the determination of "widespread use" will not necessarily affect California, as we expect that ARB will be able to show an emission benefit for use of Phase II systems even after ORVR vehicles are in "widespread use" and states can decide whether or not to maintain vapor recovery requirements.

The comments below are referenced to pages in the issue paper:

p. 13 Module 6: ISD does not "assure compliance," but instead identifies gross failures associated with significant excess emissions.

p. 14 Table 1: Compares ARB and API field test emission factors for ORVR excess emissions. ARB staff does not necessarily agree with the API emission factors, but are working together on a test program in conjunction with the Western States Petroleum Association (WSPA) to collect more information.

p. 15 The paper states that the, "API data show the miniboot reduces excess emissions." We disagree with this statement as ARB tests define excess emissions due to ORVR incompatibility as additional fugitive and vent emissions during fueling of ORVR vehicles. ARB staff did not measure the emissions at the nozzle interface during our field testing.

p. 17 API's study assumes in-use Stage II efficiencies are less than the 95% certified level and we do not disagree. However, nowhere in API's analysis or elsewhere in the issue paper is any consideration of possible degradation of the ORVR efficiency of 98%.

p. 22 The issue paper states that, "CARB staff plan to retain Stage II controls after widespread use occurs in California." Apparently, this was taken from an ARB staff statement during a conference call or workshop. The statement is likely an accurate quote, but it should probably be revised to add, "if there is an emission benefit," to put the statement in proper context.

p. 25 The statement, "if the V/L ratio is out of limits, the vapor pump flow is adjusted to achieve the correct V/L ratio," implies that the ISD system automatically adjusts the V/L ratio. The statement is taken from the February 4, 2000 staff report (p. 67) that discusses a specific sensor, not an ISD requirement.