



## ARID TECHNOLOGIES, INC.

4 May 2020

*Ms. Beth Schwehr  
California Air Resources Board  
Air Quality Planning and Science Division  
1001 I Street  
Sacramento, CA 95814*



*Re: Comments on Webinar conducted on Thursday, 30 April 2020*

Dear Ms. Schwehr,

***Background:***

The California Air Resources Board (CARB) is proposing amendments to the Emission Inventory Criteria and Guidelines Regulation and incorporated Report (collectively referred to as the EICG Regulation, or EICG) for the Air Toxics "Hot Spots" Program (AB 2588).

The EICG Regulation provides facilities information on how to compile and report the types and quantities of toxic substances they routinely release into the air. CARB is scheduling a webinar on April 30, 2020, to discuss proposed amendments to the EICG Regulation. These proposed amendments are necessary to ensure comprehensive and up-to-date reporting of emission inventories and subsequent evaluation of health risks.

The proposed amendments are also designed to support community-focused efforts at CARB to reduce criteria pollutant and air toxic emissions from California's most disadvantaged communities.

I listened with interest to the proceedings, and I would like to call your attention to proposed actions being initiated by the California Air Resources Board, Monitoring & Laboratory Division (MLD), Vapor Recovery & Fuel Transfer Branch, Vapor Recovery Regulatory Development Section.

The notice for the 5 May Remote Access Public Workshop is presented below;

California Air Resources Board (CARB) staff invites you to participate in a public workshop to discuss proposed regulatory amendments to CARB's certification and test procedures for vapor recovery systems at gasoline dispensing facilities (gas stations). The goal of the workshop is to provide information and solicit input on a suite of proposed regulatory amendments that include:

1. Revising the in-station diagnostics (ISD) system overpressure alarm criteria, improving and clarifying ISD report content, and providing more options for ISD communication ports, such as USB or Bluetooth, in addition to the currently required RS232 port;



2. Making the nozzle spillage standard more stringent to preserve superior performance achieved by currently certified equipment, and avoid backsliding;
3. Revising Phase I drop tube compliance test procedures to allow for remote fill configurations for gas stations equipped with underground storage tanks;
4. Requiring vapor recovery equipment manufacturers to provide physical samples of the system or components that successfully comply with applicable performance standards or specifications; and
5. Various administrative changes to clarify and improve the certification and test procedures for better regulatory certainty and enforceability.

Of particular note, ARID is concerned that a revision of the in-station diagnostics (ISD) system alarm criteria will not provide GDF operators with the tools they need to adequately control significant pressure driven emissions of VOC's and HAP's. In fact, a commercially proven and robust system which meets the rigorous ISD system criteria has recently been certified by CARB. In reviewing the MLD presentation outline for tomorrow's presentation, it seems that MLD is leaping to an ISD downgrade option before making detailed calculations of cost effectiveness of the presently certified solution relative to historic EVR costs on a dollar per pound of reduced emissions basis.

In addition, it seems that MLD has not considered localized public health impacts and risks of the pressure driven VOC and HAP emissions (vent and fugitive). ARID is in the process of reviewing the supporting documentation recently posted to the ARB website, but our preliminary review indicates large discrepancies regarding accurate magnitude and temporal variation of the emissions. In addition, it seems that MLD's analysis specific to the "Phase II EVR Assist System" does not consider the air dispersion impact of carcinogenic compounds nor GDF proximity to sensitive receptors and/or environmental justice communities. (I have attached to this email a recent study on this topic).

The proposed wide-sweeping elimination of the ISD system Pressure Alarms for the entire California GDF population of 10,000 sites seems inconsistent with initiatives designed to minimize localized adverse public health impacts.

We plan to participate in the MLD presentation tomorrow, and ARID is in the process of compiling our technical rebuttal to the ISD alarm elimination proposal. In the meantime, we are pleased to share with you and your group additional emissions field data and calculations collected and derived from California GDF, over a number of years.

Would you and/or your Air Quality Planning and Science Division Group be interested in further discussing this topic? If so, can you please provide guidance on to whom we should provide this information?

Sincerely,



Ted Tiberi, President & Founder  
ARID Technologies, Inc.

