State of California
Air Resources Board

Executive Order VR-104-N

Relating to Certification of Vapor Recovery Systems

CNI Manufacturing Phase I Vapor Recovery System

Whereas, the California Air Resources Board (CARB) has established, pursuant to California Health and Safety Code sections 25290.1.2, 39600, 39601, and 41954, certification procedures for systems designed for the control of gasoline vapor emissions during the filling of underground gasoline storage tanks (Phase I EVR System), in its Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities Using Underground Storage Tanks (CP-201) as last amended July 12, 2023, incorporated by reference in Title 17, California Code of Regulations, Section 94011;

Whereas, CARB has established, pursuant to California Health and Safety Code Sections 39600, 39601, 39607, and 41954, test procedures for determining the compliance of Phase I EVR Systems with emission standards;

Whereas, CNI Manufacturing Inc. requested and was granted certification of the CNI Manufacturing Phase I Vapor Recovery System (CNI Manufacturing System) pursuant to CP-201 on September 26, 2003, by Executive Order VR-104-A, and last modified on November 8, 2023, by Executive Order VR-104-M;

Whereas, Vapor Systems Technologies, Inc. (VST) requested a modification to the CNI Manufacturing System to add the VST-EVRPV-200 Pressure/Vacuum (P/V) Valve and VST-EVRPV P/V Valve with Test In Place (TIP) feature as modifications of the CNI Manufacturing System;

Whereas, CP-201 provides that the CARB Executive Officer shall issue an Executive Order if he or she determines that the vapor recovery system, including modifications, conforms to all applicable requirements set forth in CP-201;

Whereas, Executive Order G-21-474 delegates to the Chief of the Monitoring and Laboratory Division the authority to certify or approve modifications to certify Phase I and Phase II vapor recovery systems for gasoline dispensing facilities (GDF); and

Whereas, I, Walter Ham, Chief of MLD, find that the CNI Manufacturing System, as amended to include the modification listed above, conforms with all the requirements set forth in CP-201, and results in a vapor recovery system which is at least 98.0 percent efficient when tested pursuant to test procedure TP-201.1, Volumetric Efficiency for Phase I Systems (July 26, 2012).

Now therefore, it is hereby ordered that the CNI Manufacturing System including modifications is certified to be at least 98.0 percent efficient when installed, operated, and maintained as specified herein and in the following exhibits. Exhibit 1 contains a list of the

certified components. Exhibit 2 contains the performance standards and specifications, typical installation drawings, and maintenance intervals applicable to the CNI Manufacturing System as installed in a GDF. Exhibit 3 contains the manufacturing performance specifications. Exhibit 4 contains the manufacturer warranties. Exhibit 5 is the below grade vaulted tank configuration.

It is further ordered that compliance with the applicable certification requirements, rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board are made conditions of this certification.

It is further ordered that every certified component manufactured by CNI Manufacturing, EMCO, Franklin Fueling Systems (FFS), OPW, Husky Corporation (Husky), and Vapor Systems Technologies, Inc (VST) shall meet the manufacturing performance specifications as provided in Exhibit 3.

It is further ordered that the certified CNI Manufacturing System shall be installed, operated, and maintained in accordance with the CARB-Approved Installation, Operation and Maintenance (IOM) Manual for the CNI Manufacturing System as certified by Executive Order VR-104-N. Equipment shall be inspected quarterly and annually per the procedures identified in the CARB Approved IOM Manual. These inspections shall also apply to systems certified by Executive Orders VR-104-A to M. A copy of this Executive Order and the CARB Approved IOM Manual shall be maintained at each GDF where a certified CNI Manufacturing System is installed.

It is further ordered that all equipment listed in Exhibit 1, unless exempted, shall be clearly identified with a permanent identification showing the manufacturer's name and model number.

It is further ordered that any alteration in the equipment parts, design, installation, or operation of the system provided in the manufacturer's certification application or documents and certified hereby is prohibited and deemed inconsistent with this certification, unless the alteration has been submitted in writing pursuant to the process for Executive Order amendments set forth in Section 18 of CP-201 and approved in writing by the CARB Executive Officer or his or her delegate. Any sale, offer for sale, or installation of any system or component without CARB's approval as set forth above is subject to enforcement action.

It is further ordered that the following requirements are made a condition of certification. The owner or operator of the CNI Manufacturing System shall conduct and pass the following tests no later than 60 days after startup and at least once every three (3) year period after startup testing, using the following test procedures. Shorter time period may be specified by the District.

- TP 201.3, Determination of 2 Inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities (July 26, 2012);
- TP 201.1B, Static Torque of Rotatable Phase I Adaptors (October 8, 2003); and
- Depending on the system configuration, either TP 201.1C, Leak Rate of Drop Tube/Drain Valve Assembly (July 12, 2021) or TP 201.1D, Leak Rate of Drop Tube Overfill Prevention Devices, and Spill Container Drain Valves (July 12, 2021).

Districts may specify the sequencing of the above tests. Notification of testing and submittal of test results shall be done in accordance with District requirements and pursuant to the policies established by that District. District may require the use of alternate test form(s), provided they include the same minimum parameters identified in the datasheet referenced in the test procedure(s). Alternate test procedures, including the most recent versions of test procedures listed above, may be used if determined by the CARB Executive Officer or his or her delegate, in writing, to yield equivalent results. Testing the pressure/vacuum (P/V) vent valve will be at the option of the District. If P/V vent valve testing is required by the District, the test shall be conducted in accordance with TP-201.1E, Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves (October 8, 2003) and Exhibit 2.

It is further ordered that the CNI Manufacturing System shall be compatible with gasoline in common use in California at the time of certification. Any modifications to comply with future California gasoline requirements shall be approved in writing by the Executive Officer or his or her delegate.

It is further ordered that the certification of the CNI Manufacturing System shall remain valid through June 1, 2025.

It is further ordered that Executive Order VR-104-M issued on November 8, 2023, is hereby superseded by this Executive Order. CNI Manufacturing System certified under Executive Orders VR-104-A through M may remain in use at existing installations up to four years after the expiration date of this Executive Order when the certification is not renewed.

It is further ordered that this Executive Order shall apply to new installations or major modification of the Phase I system of existing gasoline dispensing facilities.

Executed at Sacramento, California, this 9th day of October 2024.

Walter Ham (Oct 9, 2024 13:23 PDT)
Walter Ham, Ph.D., Chief
Monitoring and Laboratory Division

Attachments: (see next page.)

Attachments

Exhibit 1 CNI Manufacturing Phase I Vapor Recovery System Equipment List
Exhibit 2 Installation, Maintenance and Compliance Specifications
Exhibit 3 Manufacturing Performance Standards and Specifications
Exhibit 4 Manufacturer Warranties
Exhibit 5 Vaulted Aboveground Storage Tank Configuration
Installation, Operation and Maintenance Manual