TITLE 17. CALIFORNIA AIR RESOURCES BOARD

NOTICE OF PUBLIC HEARING TO CONSIDER PROPOSED AMENDMENTS TO ENHANCED VAPOR RECOVERY REGULATIONS TO STANDARDIZE GAS STATION NOZZLE SPOUT DIMENSIONS TO HELP ADDRESS STORAGE TANK OVERPRESSURE

The California Air Resources Board (CARB or Board) will conduct a public hearing at the time and place noted below to consider approving for adoption the proposed amendments to Certification Procedures and Definitions for Vapor Recovery Systems at Gasoline Dispensing Facilities (GDF).

DATE:	October 25, 2018
TIME:	9:00 A.M.
LOCATION:	California Environmental Protection Agency California Air Resources Board Byron Sher Auditorium 1001 Street

This item will be considered at a meeting of the Board, which will commence at 9:00 a.m., October 25, 2018, and may continue at 8:30 a.m., on October 26, 2018. Please consult the agenda for the hearing, which will be available at least ten days before October 25, 2018, to determine the day on which this item will be considered.

Sacramento, California 95814

WRITTEN COMMENT PERIOD AND SUBMITTAL OF COMMENTS

Interested members of the public may present comments orally or in writing at the hearing and may provide comments by postal mail or by electronic submittal before the hearing. The public comment period for this regulatory action will begin on September 7, 2018. Written comments not physically submitted at the hearing must be submitted on or after September 7, 2018, and received **no later than 5:00 p.m. on October 22, 2018**. CARB requests that, when possible, written and email statements be filed at least ten days before the hearing to give CARB staff and Board members additional time to consider each comment. The Board also encourages members of the public to bring to the attention of staff in advance of the hearing any suggestions for modification of the proposed regulatory action. Comments submitted in advance of the hearing must be addressed to one of the following:

Postal mail: Clerk of the Board, California Air Resources Board 1001 I Street, Sacramento, California 95814 Electronic submittal: <u>http://www.arb.ca.gov/lispub/comm/bclist.php</u>

Please note that under the California Public Records Act (Gov. Code, § 6250 et seq.), your written and oral comments, attachments, and associated contact information (e.g., your address, phone, email, etc.) become part of the public record and can be released to the public upon request.

Additionally, the Board requests but does not require that persons who submit written comments to the Board reference the title of the proposal in their comments to facilitate review.

AUTHORITY AND REFERENCE

This regulatory action is proposed under the authority granted in California Health and Safety Code § 41954. This action is proposed to implement, interpret, and make specific § 41954(a).

INFORMATIVE DIGEST OF PROPOSED ACTION AND POLICY STATEMENT OVERVIEW (GOV. CODE, § 11346.5, subd. (a)(3))

<u>Sections Affected</u>: Proposed amendment to California Code of Regulations, title 17, §§ 94010, 94011, 94016, and 94017.

Documents Incorporated by Reference (Cal. Code Regs., tit. 1, § 20, subd. (c)(3)): The following documents would be incorporated in the regulation by reference in California Code of Regulations, title 17, §§ 94010, 94011, 94016, and 94017, respectively:

- D-200 Definitions for Vapor Recovery Procedures [insert amendment date]
- CP-201 Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities [insert amendment date]
- CP-206 Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities Using Aboveground Storage Tanks [insert amendment date]
- CP-207 Certification Procedure for Enhanced Conventional (ECO) Nozzles and Low Permeation Conventional Hoses for Use at Gasoline Dispensing Facilities [insert amendment date]

Background and Effect of the Proposed Regulatory Action:

California's vapor recovery program controls emissions associated with the storage and transfer of gasoline from storage tanks at terminals or bulk plants to tanker trucks, from tanker trucks to storage tanks at GDFs, and from GDF tank to the vehicle's fuel tank

during vehicle fueling. CARB and the air pollution control/air quality management districts (air districts) share responsibility for implementing the vapor recovery program. CARB staff certifies prototype vapor recovery systems installed at operating GDFs. State law requires that throughout California only CARB-certified systems be offered for sale, sold, and installed. Air district rules require GDF operators to install and maintain vapor recovery systems to prevent release of gasoline vapors that contribute to the formation of ozone and to reduce the public's exposure to benzene, a toxic air contaminant. Air district staff also conduct regular inspections to check that systems are operating as certified.

CARB staff is now proposing to make amendments to several of the existing vapor recovery certification procedures and definitions for those procedures that will standardize GDF nozzle spout and bellows dimensions. CARB staff proposes to refine the three spout dimensions already defined in the certification procedures as well as to include sixteen additional dimensions for the:

- Shape and position of the enhanced vapor recovery (EVR) and enhanced conventional (ECO) nozzles' spout and spout latch ring;
- Outside and inside diameter of the vapor collection bellows, face flatness, and contact angle, for EVR vacuum-assist and balance nozzles; and
- Outside diameter of the insertion interlock device for ECO nozzles.

CARB staff proposes that these dimensions and associated definitions be added to the certification procedures. In addition, CARB staff proposes that the following document be incorporated by reference once it has been updated to include these dimensions:

Society of Automotive Engineers (SAE). Surface Vehicle Recommended Practice SAE J285: "Dispenser Nozzle Spouts for Liquid Fuels Intended for Use with Spark Ignition and Compression Ignition Engines." (Update to be issued.)

The proposed nozzle dimensions also reference the following SAE recommended practice document:

Society of Automotive Engineers (SAE). Recommended Practice SAE J1140: "Filler Pipes and Openings of Motor Vehicle Fuel Tanks." (Update to be issued.)

The draft updated version of SAE J1140 has not yet completed the SAE approval process. For a review of proposed J1140 updates, see the CARB staff report, *Proposed Amendments to California Specifications for Fill Pipes and Openings of Motor Vehicle Fuel Tanks*, to be released September 7, 2018 [CARB, 2018c].

CARB may also consider other changes to the sections affected, as listed on page 2 of this notice, during the course of this rulemaking process. Any changes to the sections

affected or the addition of further documents incorporated by reference will be publicly noticed and available for public comment for a period of no less than 15 days.

Objectives and Benefits of the Proposed Regulatory Action:

The proposed amendments are for new dimension requirements and definitions for nozzles used at gasoline dispensing facilities. The amendments are needed to improve nozzle compatibility with newer motor vehicle fill pipes. This compatibility is necessary to reduce air ingestion at the nozzle, which will help reduce pressure driven emissions (overpressure emissions) caused by evaporation of gasoline within the GDF storage tank headspace. Unexpected pressure driven emissions cause GDF vapor recovery systems to not achieve the performance standards and emission reductions anticipated when EVR regulations were adopted. The proposed amendments would prevent the certification of new nozzles not meeting the proposed nozzle specifications.

Emission reductions will result from the statewide implementation of the Healy Model 900 assist nozzle that includes the "Enhanced ORVR-Vehicle Recognition" (EOR) spout assembly at GDFs with vacuum-assist vapor recovery systems. The EOR spout assembly enables a better seal between the nozzle's vapor collection bellows and a fill pipe of a vehicle with an on board refueling vapor recovery (ORVR) system, thereby reducing excess air ingestion. Approximately 52 percent of California GDFs are equipped with the vacuum assist system and there is only one manufacturer of assist nozzles certified for sale in California. The EOR version of the spout assembly meets the proposed dimensional standards. Based on ORVR recognition test data provided by CARB staff, the manufacturer of the Healy assist nozzle voluntarily developed the improved EOR spout assembly to help reduce air ingestion at the nozzle and no longer manufactures the prior version of the nozzle that does not meet the proposed dimensions. The remaining 48 percent of California GDFs are equipped with balance system nozzles. All currently certified balance nozzles meet the proposed spout assembly dimensions.

CARB staff estimates that statewide implementation of the assist EOR nozzle will improve air quality by reducing gasoline vapor (aka reactive organic gases, or ROG) emissions, which also contain benzene, by about one ton per day. Reducing ROG emissions is an integral part of California's program for reaching its goal of attaining and maintaining federal and State ozone standards. Reducing emissions is critical to reducing benzene health risk for people who live and work near gasoline dispensing facilities. The proposed amendments will preserve emission reductions anticipated to result from statewide implementation of the assist EOR nozzle by preventing the introduction of new nozzles with dimensions known to result in a poor seal at the nozzle interface with a vehicle fill pipe. Standardization of spout dimensions will also enable the automotive industry to more effectively design compatible fill pipes for future vehicle models.

In addition, reducing overpressure conditions will reduce the frequency of GDF In-Station Diagnostic (ISD) system overpressure alarms, which will reduce the frequency and cost of service calls for many GDFs with vacuum-assist vapor recovery systems. Improving compatibility between nozzles and fill pipes also will make it easier for many customers to fuel their vehicles by reducing the effort needed to insert the nozzle in the fill pipe. The proposed amendments will preserve the cost savings and other benefits associated with improving the compatibility between nozzles and fill pipes.

CARB staff's proposal was developed in conjunction with an extensive public process. Staff informed, involved, and updated public stakeholders on staff's progress developing the proposed amendments. Staff held public workshops and had other meetings with interested persons during the development of the proposed regulatory amendments. These informal pre-rulemaking discussions provided staff with useful information that they considered during development of the regulatory amendments that are now being proposed for formal public comment.

Between 2012 and 2017, CARB staff held eleven public workshops in northern and southern California about GDF storage tank overpressure problems, study designs and results, and potential solutions. These workshops engaged representatives from nozzle, fill pipe, and automotive manufacturers; GDF owners and operators; service contractors and consultants; petroleum refineries and distributors; air districts; tribes; environmental consultants; farm bureaus; and air quality agencies from outside of California. In addition, staff created a public webpage where related workshop materials and technical support documents were posted to keep stakeholders up to date on the latest developments in the regulatory process and distributed announcements and workshop materials through the CARB list serves that, based on individual subscribers to the list serves, reach more than 4,000 individuals. Staff sent out multiple emails providing announcements to upcoming workshops, a description of the proposed amendments, and contact information for relevant staff.

Further, over the last two years, CARB staff participated in over a dozen meetings with the Society of Automotive Engineers (SAE) Fuel Systems J285/J1140 Task Force (SAE Task Force), which is comprised of nozzle, vehicle, and fill pipe manufacturers. The SAE Task Force is charged with developing and testing new dimension specifications to standardize the vapor recovery nozzle and fill-pipe interface to improve compatibility. The nozzle dimensions included in CARB staff's proposed amendments are the result of extensive deliberations of nozzle, vehicle, and fill pipe manufacturers who participated in the SAE Task Force. All the proposed dimensions have a range of values, rather than a single value, to increase flexibility and allow for innovation among nozzle manufacturers. The SAE Task Force will include the new specifications in an updated version of the SAE recommended practice document called: *J285: Dispenser Nozzle Spouts for Liquid Fuels Intended for Use with Spark Ignition and Compression Ignition Engines.*

Comparable Federal Regulations:

The three nozzle spout dimensions currently specified in CARB certification procedures CP-201, CP-206, and CP-207 are referenced in 40 CFR 80.22(f), where they are applied to nozzles that dispense unleaded gasoline. CARB staff proposes to refine these three dimensions as well as to include sixteen additional dimensions for the:

- Shape and position of the EVR and ECO nozzles' spout and spout latch ring;
- Outside and inside diameter of the vapor collection bellows, face flatness, and contact angle, for EVR assist and balance nozzles; and
- Outside diameter of the insertion interlock device for ECO nozzles.

However, there are no federal regulations or programs directly comparable to California's EVR program for GDFs, and there are no federal regulations establishing dimension specifications for vapor recovery and ECO nozzles, as would be required by the proposed regulatory amendments. California's existing EVR regulations already exceed federal requirements. Other states and countries often require the installation of vapor recovery systems certified by CARB. Thus, changes to CARB EVR certification requirements may have a national and international impact.

An Evaluation of Inconsistency or Incompatibility with Existing State Regulations (Gov. Code § 11346.5, subd. (a)(3)(D)):

During the process of developing the proposed regulatory action, CARB staff conducted a search of any similar regulations on this topic and concluded these regulations are neither inconsistent nor incompatible with existing state regulations.

DISCLOSURE REGARDING THE PROPOSED REGULATION

The determinations of the Board's Executive Officer concerning the costs or savings incurred by public agencies and private persons and businesses in reasonable compliance with the proposed regulatory action are presented below.

Fiscal Impact/Local Mandate Determination Regarding the Proposed Action (Gov. Code, § 11346.5, subds. (a)(5)&(6)):

Under Government Code §§ 11346.5, subdivision (a)(5) and 11346.5, subdivision (a)(6), the Executive Officer has determined that the proposed regulatory action would not create costs or savings to any State agency or in federal funding to the State, costs or mandate to any local agency or school district, whether or not reimbursable by the State under Government Code, title 2, division 4, part 7 (commencing with § 17500), or other nondiscretionary cost or savings to State or local agencies.

Housing Costs (Gov. Code, § 11346.5, subd. (a)(12)):

The Executive Officer has also made the initial determination that the proposed regulatory action will not have a significant effect on housing costs.

Significant Statewide Adverse Economic Impact Directly Affecting Business, Including Ability to Compete (Gov. Code, §§ 11346.3, subd. (a), 11346.5, subd. (a)(7), 11346.5, subd. (a)(8)):

The Executive Officer has made an initial determination that the proposed regulatory action would not have a significant statewide adverse economic impact directly affecting businesses, including the ability of California businesses to compete with businesses in other states, or on representative private persons.

<u>Results of The Economic Impact Analysis/Assessment (Gov. Code, § 11346.5, subd. (a)(10))</u>:

A detailed assessment of the economic impacts of the proposed regulatory action can be found in Chapter VIII of the ISOR.

NON-MAJOR REGULATION: Statement of the Results of the Economic Impact Assessment (EIA):

<u>Benefits of the Regulation to the Health and Welfare of California Residents, Worker</u> <u>Safety, and the State's Environment:</u>

The objective of the proposed regulatory action is to standardize dimensions for GDF nozzles. CARB staff estimates that statewide implementation of the assist EOR nozzle will result in a reduction of ROG emissions, which also contain benzene, by about one ton per day. The proposed amendments will preserve the emission reductions anticipated to result from implementation of the assist EOR nozzle and will prevent the introduction of new nozzles with design features known to result in a poor seal at the interface between the nozzle and vehicle fill pipe. Reducing ROG emissions will benefit the health and welfare of California residents by reducing ambient ground level ozone and benzene exposure. Although the regulation will not directly affect worker safety, workers at GDFs with assist vapor recovery systems may experience reduced occupational exposure to benzene after the improved nozzles are installed. Reducing ambient ground level ozone also helps to reduce smog, which is a benefit for the state's environment.

Effect on Jobs/Businesses:

The Executive Officer has determined that the proposed regulatory action would not affect the creation or elimination of jobs within the State of California, the creation of new businesses or elimination of existing businesses within the State of California, or the expansion of businesses currently doing business within the State of California. A detailed assessment of the economic impacts of the proposed regulatory action can be found in the Economic Impact Assessment in the Initial Statement of Reasons (ISOR).

Benefits of the Proposed Regulation:

The objective of the proposed regulatory action is to standardize dimensions for GDF nozzles. The proposed amendments will preserve benefits anticipated to result from the voluntary improvement of the Healy assist EOR nozzle, which include reduced gasoline vapor emissions, reduced operating costs for many GDFs, and reduced effort for many customers to fuel their vehicles. Further, the proposed regulatory action will prevent the introduction of new nozzles with design features known to result in a poor seal at the interface between the nozzle and vehicle fill pipe.

A summary of these benefits is provided in this notice. Please refer to the "Objectives and Benefits" section, under the Informative Digest of Proposed Action and Policy Statement Overview that begins on page 2.

<u>Cost Impacts on Representative Private Persons or Businesses (Gov. Code, § 11346.5, subd. (a)(9))</u>:

In developing this regulatory proposal, CARB staff evaluated the potential economic impacts on representative private persons or businesses. CARB staff is not aware of any cost impacts that a representative private person would necessarily incur in reasonable compliance with the proposed action.

Certain businesses that own GDFs with vacuum-assist vapor recovery systems may experience a savings because of implementation of the improved assist EOR nozzle, which may reduce the frequency of ISD overpressure alarms and associated frequency and cost of service calls for operators. CARB staff estimated an average cost-savings of about \$962 per year per affected GDF. CARB staff predicts that over 300 GDFs may experience cost-savings. These sum to about \$3.47 million in cost-savings over the anticipated lifetime of the proposed regulations. The proposed amendments will preserve these cost savings by codifying dimensions that improve compatibility with vehicle fill pipes in case manufacturers consider developing new nozzles in the future.

Nozzle manufacturers may have a small increase in initial nozzle certification costs and certification renewal costs associated with the additional time needed for CARB certification staff to evaluate compliance with an increased number of nozzle dimensions. There are currently five manufacturers that either produce nozzles already certified by CARB for sale in California (three vapor recovery nozzles), or have submitted applications for nozzle certification (three ECO nozzle prototypes). Company profile information available for the five nozzle manufacturers indicates none meets the definition of small business and none is based in California. CARB staff estimated a total potential cost of \$2,280 for incorporating additional dimensions in the review of the six vapor recovery and ECO nozzle when nozzle manufacturers apply for certification renewal. The combined costs for nozzle manufacturers for re-certification and certification renewal equate to an additional cost of about \$3,230 per nozzle model for the three vapor recovery nozzle models and three ECO nozzle prototypes over the 11-year lifetime of the proposed regulations. CARB staff estimated a total potential cost of

about \$1,140 over 11 years for incorporating additional dimensions in the review of potential future prototype nozzles when nozzle manufacturers apply for initial certification and certification renewal. These costs sum to about \$20,520 over the 11-year lifetime of the proposed regulations. If nozzle manufacturers were able to pass on all costs along with an estimated 20 percent markup, this would result in \$24,624 in costs to California businesses over the 11-year lifetime of the regulation. This could result in approximately \$5 in additional cost per impacted California business (\$24,624 ÷ 5,305 impacted GDFs) over the 11-year lifetime, which is considered to be negligible.

Effect on Small Business (Cal. Code Regs., tit. 1, § 4, subds. (a) and (b)):

The Executive Officer has also determined under California Code of Regulations, title 1, § 4, that the proposed regulatory action would not negatively impact small businesses. Statewide implementation of the Healy assist nozzle with the improved EOR spout assembly would have direct benefits (cost-savings) for small business owners of GDFs with assist systems and ISD systems that have experienced frequent ISD overpressure alarms. Based on field study results (see Chapter II of the ISOR), CARB staff predicts that about 80 percent of these GDFs will experience substantially fewer overpressure alarms once they install an improved assist nozzle (e.g., the Healy nozzle that includes the EOR spout assembly). Because some GDF operators pay for authorized service providers to respond to every ISD overpressure alarm, rather than self-clear the alarms, reducing the number of overpressure alarms will result in reduced GDF operating costs. CARB staff predicts that over 100 GDFs owned by small businesses may experience cost-savings. The proposed amendments will preserve the anticipated cost-savings associated with improving the compatibility between assist nozzles and fill pipes.

The proposed amendments also have an indirect effect on small businesses that own GDFs with assist systems because the proposed amendments require all GDFs with assist systems to replace the old version of the Healy Model 900 that does not have the improved EOR spout assembly. However, this proposed requirement has no cost impact for two reasons. First, Franklin Fueling Systems, the manufacturer of the Healy assist nozzle, no longer manufactures nor distributes the old model, and CARB staff's survey of parts distributors and service contractors indicates their inventory of the old model will be depleted by the end of 2018 (before the proposed amendments would become effective). Second, the proposed amendments provide an exception to existing certification procedure requirements that would allow GDF operators to use their old model nozzles until the end of their useful life, even if the useful life extends beyond four years. Therefore, there would be no new cost associated with replacing the old version of the assist nozzle with the new version.

Consideration of Alternatives (Gov. Code, § 11346.5, subd. (a)(13)):

Before taking final action on the proposed regulatory action, the Board must determine that no reasonable alternative considered by the Board, or that has otherwise been identified and brought to the attention of the Board, would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law. CARB staff considered reasonable alternatives to the proposed amendments, as described in Chapter IX of the ISOR.

ENVIRONMENTAL ANALYSIS

CARB, as the lead agency under the California Environmental Quality Act (CEQA), has reviewed the proposed regulatory amendments and concluded that the proposed action is exempt pursuant to CEQA Guidelines §15308, because the action is an action taken by regulatory agencies for the protection of the environment. A brief explanation of the basis for reaching this conclusion is included in Chapter VI of the ISOR.

SPECIAL ACCOMMODATION REQUEST

Consistent with California Government Code § 7296.2, special accommodation or language needs may be provided for any of the following:

- An interpreter to be available at the hearing;
- Documents made available in an alternate format or another language; and
- A disability-related reasonable accommodation.

To request these special accommodations or language needs, please contact the Clerk of the Board at (916) 322-5594 or by facsimile at (916) 322-3928 as soon as possible, but no later than 10 business days before the scheduled Board hearing. TTY/TDD/Speech to Speech users may dial 711 for the California Relay Service.

Consecuente con la sección 7296.2 del Código de Gobierno de California, una acomodación especial o necesidades lingüísticas pueden ser suministradas para cualquiera de los siguientes:

- Un intérprete que esté disponible en la audiencia;
- Documentos disponibles en un formato alterno u otro idioma; y
- Una acomodación razonable relacionados con una incapacidad.

Para solicitar estas comodidades especiales o necesidades de otro idioma, por favor llame a la oficina del Consejo al (916) 322-5594 o envié un fax a (916) 322-3928 lo más pronto posible, pero no menos de 10 días de trabajo antes del día programado para la audiencia del Consejo. TTY/TDD/Personas que necesiten este servicio pueden marcar el 711 para el Servicio de Retransmisión de Mensajes de California.

AGENCY CONTACT PERSONS

Inquiries concerning the substance of the proposed regulatory action may be directed to the agency representative, Michelle Wood, Air Pollution Specialist, Vapor Recovery Regulatory Development Section, at (916) 445-3641 or (designated back-up contact) Lou Dinkler, Manager, Vapor Recovery Regulatory Development Section, at (916) 324-9487.

AVAILABILITY OF DOCUMENTS

CARB staff has prepared a Staff Report: Initial Statement of Reasons (ISOR) for the proposed regulatory action, which includes a summary of the economic and environmental impacts of the proposal. The report is entitled: *Proposed Amendments to Enhanced Vapor Recovery Regulations to Standardize Gas Station Nozzle Spout Dimensions to Help Address Storage Tank.*

Copies of the ISOR and the full text of the proposed regulatory language, in underline and strikeout format to allow for comparison with the existing regulations, may be accessed on CARB's website listed below, or may be obtained from the Public Information Office, California Air Resources Board, 1001 I Street, Visitors and Environmental Services Center, First Floor, Sacramento, California, 95814, on September 4, 2018.

Further, the agency representative to whom nonsubstantive inquiries concerning the proposed administrative action may be directed is Chris Hopkins, Regulations Coordinator, (916) 445-9564. CARB staff has compiled a record for this rulemaking action, which includes all the information upon which the proposal is based. This material is available for inspection upon request to the contact persons.

HEARING PROCEDURES

The public hearing will be conducted in accordance with the California Administrative Procedure Act, Government Code, title 2, division 3, part 1, chapter 3.5 (commencing with section 11340).

Following the public hearing, the Board may take action to approve for adoption the regulatory language as originally proposed, or with non-substantial or grammatical modifications. The Board may also approve for adoption the proposed regulatory language with other modifications if the text as modified is sufficiently related to the originally proposed text that the public was adequately placed on notice and that the regulatory language as modified could result from the proposed regulatory action. If this occurs, the full regulatory text, with the modifications clearly indicated, will be made available to the public, for written comment, at least 15-days before final adoption.

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The public may request a copy of the modified regulatory text from CARB's Public Information Office, Air Resources Board, 1001 I Street, Visitors and Environmental Services Center, First Floor, Sacramento, California, 95814.

FINAL STATEMENT OF REASONS AVAILABILITY

Upon its completion, the Final Statement of Reasons (FSOR) will be available and copies may be requested from the agency contact persons in this notice, or may be accessed on CARB's website listed below.

INTERNET ACCESS

This notice, the ISOR and all subsequent regulatory documents, including the FSOR, when completed, are available on CARB's website for this rulemaking at http://www.arb.ca.gov/regact/2018/gdfnozzles2018/gdfnozzles2018.htm

CALIFORNIA AIR RESOURCES BOARD

Richard W. Corey Executive Officer

Date: August 21, 2018

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 at <u>www.arb.ca.gov</u>.