

California Environmental Protection Agency



**MODIFIED PROPOSED AMENDMENTS TO**

**Vapor Recovery Test Procedure**

**TP-201.1C**

**Pressure Integrity Leak Rate of  
Drop Tube/Drain Valve Assembly**

**Adopted: July 3, 2002**

**Amended:**

Note: The text is shown in ~~strikeout~~ to indicate text that is proposed for deletion and underline to indicate text that is proposed for addition. [Bracketed text] is not part of the proposed amendments. Proposed 15-day changes are shown with double underline for addition and ~~double strike-out~~ for deletion.

California Environmental Protection Agency  
Air Resources Board

Vapor Recovery Test Procedure

TP-201.1C

**Pressure Integrity Leak Rate of Drop Tube/Drain Valve Assembly**

Definitions common to all certification and test procedures are in:

**D-200 Definitions for Vapor Recovery Procedures**

For the purpose of this procedure, the term "CARB" refers to the California Air Resources Board, and the term "Executive Officer" refers to the CARB Executive Officer, or his or her authorized representative or designate.

**1. PURPOSE AND APPLICABILITY**

~~1.1~~ The purpose of this procedure is to quantify the pressure integrity leak rate of both a drop tube and drain valve seal ~~Drop Tube/Drain Valve Assembly~~ when the a drop tube is installed below a spill containment bucket on a two-point Phase I system spill container drain path ~~valve is configured to pass liquid into the drop tube as shown in Figure 1. This procedure is used during certification and in the determination of compliance to determine compliance of equipment at installed at gasoline dispensing facilities with the performance standards specification for the maximum allowable leakrate for the spill container drain valve and verifies the zero leak limit for a drop tube seal and threaded components (Drop Tube/Drain Valve Assembly) as defined in the Certification Procedure CP-201. This procedure is not applicable to those Gasoline Dispensing Facilities (GDF) that have a drop tube overfill prevention device installed. It is used to certify and to determine the compliance of components with the performance specification for the maximum allowable leak rate as defined in CP-201 Vapor Recovery Certification Procedure for Gasoline Dispensing Facilities.~~

**2. PRINCIPLE AND SUMMARY OF TEST PROCEDURE**

~~2.1~~ A compatible product cap, ~~compatible for use on a Phase I product adaptor is modified to allow the introduction of nitrogen into a Phase I drop tube installation of a flow meter and pressure gauge.~~ A pressure-measuring device is connected to the modified cap. If the resulting measured nitrogen flowrate necessary to maintain a steady-state pressure of 2.00 inches H<sub>2</sub>O is less than, or equal to, the maximum allowable leakrate the Drop Tube/Drain Valve Assembly is verified to be in compliance. ~~Nitrogen is introduced at a rate equal to the maximum allowable leak rate of the Drop Tube/Drain Valve Assembly and pressure is measured.~~

~~2.2~~ If the introduction of nitrogen, at a flowrate equal to the maximum allowable leakrate does not result in a steady state pressure that meets, or exceeds, the limits specified

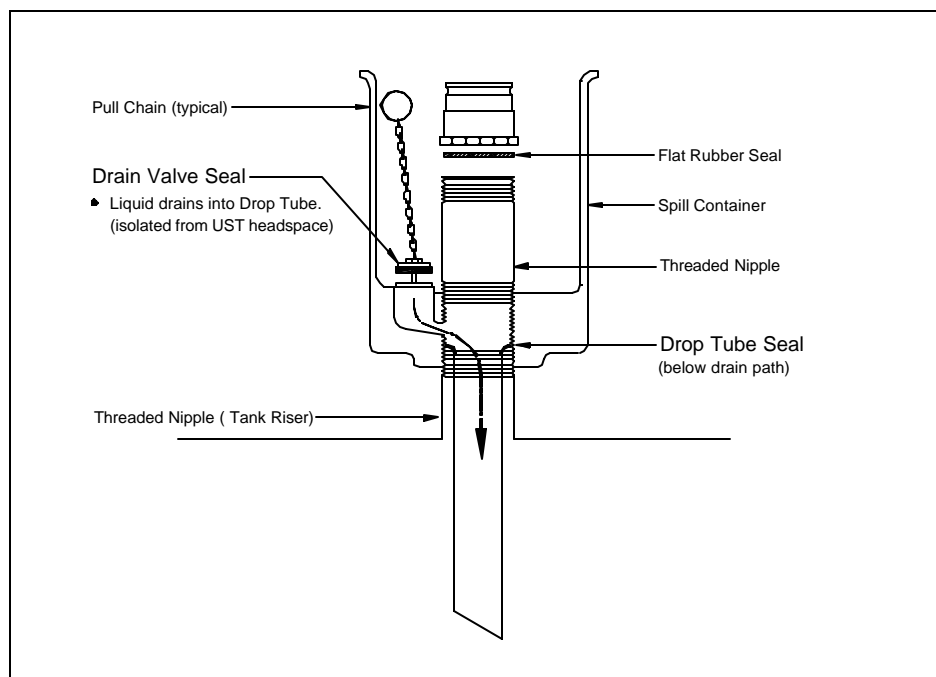
~~in CP-201, the Phase I product adaptor shall be inspected and tested. Any leaks attributable to the Phase I product adaptor shall be corrected and the test repeated to ensure the measured pressure versus flowrate is attributable only to the Drop Tube/Drain Valve Assembly. If the resulting measured pressure at the allowable leak rate is less than the performance standard, the product adaptor, drop tube seal and tank connections are inspected and tested. Any leaks attributable to the above mentioned components shall be corrected and the test repeated to ensure the measured pressure versus flow rate is attributable only to the Drop Drain/Drain Valve Assembly.~~

A compatible dust cap for a Phase I product adaptor is modified to allow the introduction of nitrogen into the Phase I drop tube. A pressure gauge is connected to the modified cap and nitrogen is flowed into the drop tube. If the resulting nitrogen flow rate necessary to maintain a steady-state pressure is less than or equal to the specifications described in CP-201, the drop tube/drain valve assembly is verified to be in compliance. An inflatable bladder is installed in the Phase I drop tube below the spill container drain valve path to eliminate potential biases resulting from the level of fuel in the storage tank.

~~[Proposed for addition]~~

~~**Figure 1**~~

**Drop Tube/Drain Valve Assembly**



### 3. BIASES AND INTERFERENCES

- ~~3.1~~ Missing or defective gaskets on the Phase I product adaptor, or a loose adaptor, may bias the results towards noncompliance. ~~This bias is eliminated by testing the Phase I product adaptor for leaks prior~~ Prior to a final determination of the noncompliance of the component(s), status of the Drop Tube/Drain Valve Assembly. Use leak detection solution on all visible components to verify the absence of leaks.
- ~~3.2~~ Refueling during the test may bias the results. No vehicle refueling or bulk deliveries to any of the tanks at the facility shall occur during this test.
- ~~3.32~~ Product levels less than four (4) inches above the highest opening at the bottom of the submerged drop tube may bias the test toward noncompliance.
- ~~3.432~~ Leaks in the test equipment will bias the results toward noncompliance. Prior to conducting the test, this bias is eliminated by conducting a leak check of the test equipment. ~~leak detection solution may also be used during the test to verify the absence of leaks in the test equipment. During testing, this bias may be eliminated by using a leak detection solution on the test equipment and verifying that no bubbles are present. Leak detection solution may also be used during the test to verify the absence of leaks in the test equipment.~~

#### Figure 1 Pressure Introduction Assembly

[Original Figure 1, Pressure Introduction Assembly, is proposed to follow subsection 5.8 and is proposed to be re-titled as Figure 2 ~~Drop Tube~~ Leak Rate Test Assembly]

- ~~3.5~~ Use of this procedure to quantify the leak rate of containment box drain valves that drain liquid into the ullage of the storage tank, rather than into the drop tube, will yield invalid results.

### 4. SENSITIVITY, RANGE, AND PRECISION

- ~~4.1~~ The measurable leakrate is dependent upon the range of the flowmeter used for the test. The recommended flowmeter range specified in Section 5.1 provides sufficient precision at the maximum allowable leakrate defined in CP-201. ~~Flow Metering Device (i.e., Rotameters). Minimum sensitivity shall be 15 ml/min (.005 CFH) with a maximum full scale range of 300 ml/min and minimum accuracy of ± five percent (5%). The device scale shall be a minimum of 150mm (5.91 inches) tall to provide a sufficient number of graduations for accurate readability.~~
- ~~4.2~~ The sensitivity of the pressure measuring device is 0.01 inches H<sub>2</sub>O for electronic pressure measuring devices and 0.05 inches H<sub>2</sub>O for mechanical pressure gauges. ~~Mechanical Pressure Gauge. Maximum full scale range shall be 5.00 inches H<sub>2</sub>O with minimum accuracy of +/- 2.0 percent of full scale. The minimum sensitivity of 0.01 inches H<sub>2</sub>O. The diameter of the pressure gauge face shall be 4 inches.~~

~~4.3 Electronic Pressure Gauge. Sensitivity shall be 0.01 inches H<sub>2</sub>O with a maximum full scale range of 20 inches H<sub>2</sub>O and minimum accuracy of +/- 2 percent full scale.~~

~~4.4 Stopwatch. Accurate to within 0.10 seconds.~~

4.1 Flow Meter. The measurable leak rate is dependent upon the sensitivity, range and precision of the flow meter used for testing. The flow meter minimum sensitivity shall be 12.5 ml/min (.026 CFH) with minimum accuracy of ± 5 percent full-scale. The device scale shall be 150mm (5.91 inches) tall to provide a sufficient number of graduations for readability. For electronic flow metering devices, the minimum sensitivity shall be 1.0 ml/min (0.0021 CFH) with a minimum full-scale accuracy of ±1.0 percent.

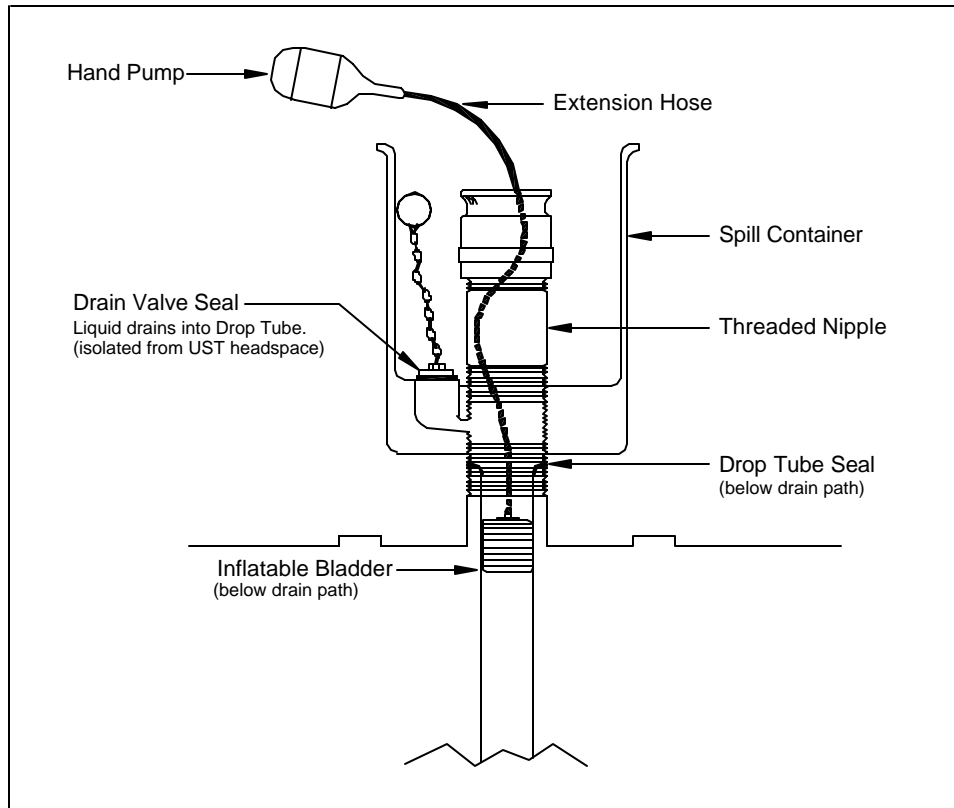
4.2 Pressure Gauge. The measurable pressure is dependent upon the sensitivity, range and precision of the pressure gauge used for testing. For mechanical pressure gauges, the maximum pressure range shall be 0-4 inches H<sub>2</sub>O. The minimum full-scale accuracy shall be ± 3.0 percent and the gauge shall be readable to the nearest 0.10 inches H<sub>2</sub>O. For electronic pressure gauges, the maximum pressure range of the device shall be -10 to 10 inches H<sub>2</sub>O. The minimum full accuracy shall be ± 1.5 percent of full-scale range and the pressure gauge shall be readable to the nearest 0.01 inches H<sub>2</sub>O.

### **Figure 2**

#### **Product Cap Test Assembly**

[Figure 2 is proposed to be relocated following subsection 6.3 and renamed to Figure 3  
~~Drop Tube Product Adaptor Test Cap~~]

**Figure 1**  
**Typical Inflatable Bladder Installation**



**5. EQUIPMENT**

~~**5.1** Pressure Introduction Assembly. Drop Tube Test Assembly and Drop Tube Test Cap. Use a product dust cap, or equivalent, compatible with the Phase I product adaptor. The cap shall be equipped with a minimum of two (2) pressure taps and flowmeter capable of measuring flowrates equal to the maximum allowable leakrate. in which to connect a pressure gauge and flow meter. The maximum allowable full-scale range for the flowmeter shall be 1.00 CFH. The flowmeter shall be calibrated for use with nitrogen. As a safety precaution, the hose used to feed nitrogen into the assembly shall be steel braided, or a separate grounding strap may be used. An example of a complete Pressure Introduction Drop Tube Test Assembly is shown in Figure 12. An example of a Product Cap Test Assembly Drop Tube Test Cap is shown in Figure 23.~~

~~**5.2** Pressure Measuring Device. Use a pressure-measuring device to monitor the pressure in the drop tube.~~

~~5.2.1 If an electronic pressure-measuring device is used, the maximum full scale range of the device shall be 10 inches H<sub>2</sub>O. The minimum accuracy shall be~~

0.5 percent and the pressure measuring device shall be readable to the nearest 0.01 inches H<sub>2</sub>O.

~~5.2.2 If a mechanical pressure measuring device is used, the maximum fullscale range shall be 5 inches H<sub>2</sub>O. The minimum accuracy shall be 1.0 percent and the minimum graduations shall be 0.05 inches H<sub>2</sub>O. The minimum diameter of the pressure gauge face shall be 4 inches.~~

~~Pressure Gauge. Use a Dwyer Model 475 Mark III Series™ electronic pressure gauge or equivalent, to measure the pressure inside of the drop tube. If a mechanical pressure gauge is desired, use a Magnahelic Model 2000-0™ or equivalent that conforms to the minimum specifications listed in Section 4 to measure the pressure inside of the drop tube during testing.~~

**Figure 3**  
**Vapor Poppet Pressure Relief Assembly** [Figure removed]

~~5.3 Flow Meter (Rotameter). Use an Aalborg Flow Meter, tube number 032-41C or equivalent with minimum specifications in Section 4 to introduce nitrogen flow.~~

~~5.1 Pressure Gauge. Use a pressure gauge with minimum specifications listed in Section 4 to monitor the pressure in the drop tube.~~

~~5.2 Flow Meter. Use a flow meter with minimum specifications listed in Section 4 to set the required nitrogen flow rate(s).~~

~~5.343 Nitrogen. Use inert, commercial grade gaseous nitrogen in a high-pressure cylinder, equipped with a two-stage pressure regulator and a one psig pressure relief valve.~~

~~5.454 Stopwatch. Use a stopwatch accurate to within 0.2 seconds accurate to within 0.10 seconds to time the duration of the test pressurization of the drop tube and pressure stabilization period one-minute flow.~~

~~5.565 Leak Detection Solution. Any non-flammable commercial liquid solution designed to detect vapor leaks may be used to verify the pressure integrity of the Phase I product adaptor during this test.~~

~~5.6 Vapor Poppet Pressure Relief Assembly. Use an assembly to open the Phase I vapor poppet during testing. This will ensure that the underground storage tank (UST) ullage and liquid surface is at zero gauge pressure. An example of a Vapor Poppet Pressure Relief Assembly is shown in Figure 3.~~

~~5.7 Traffic Cones or Caution Tape. Use traffic cones or caution tape to encircle the area containing the Phase I spill containment buckets while the test is being conducted containers during testing.~~

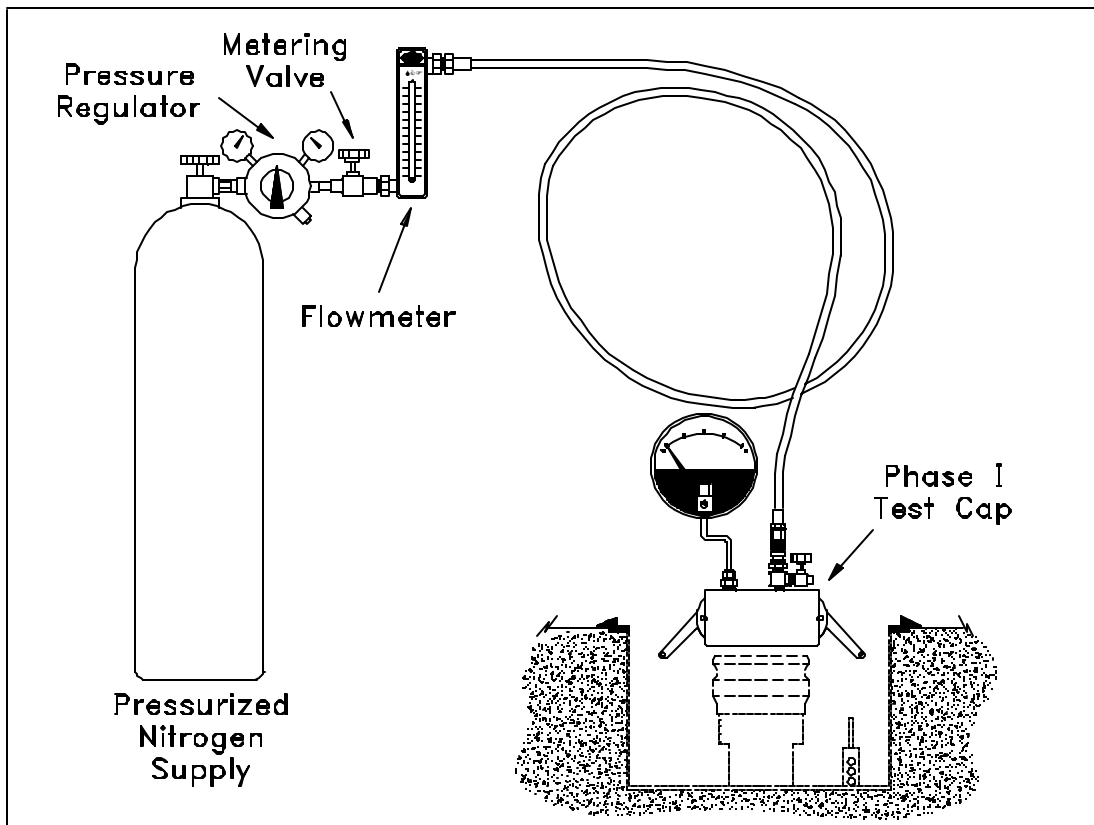
~~5.8 Tank Gauging Stick. Use a tank gauging stick of sufficient length to verify that the UST liquid level is at least four (4) inches above the highest opening at the bottom of~~

~~the submerged drop tube. The tank gauging stick shall be equipped with a non-sparking "L" bracket at the end.~~

5.6 Inflatable bladder. Use an inflatable bladder and extension hose, as shown in Figure 1, to isolate the drain valve. Unless otherwise specified in the certification Executive Order for the system, a "3-4 model" inflatable plumber's bladder may be used.

5.7 Product Adaptor Test Cap. Use a modified product dust cap compatible with the Phase I product adaptor. The cap shall be equipped with connections for a pressure gauge and flow meter. An optional metering valve may be installed to relieve excess pressure. An example of a Product Adaptor Test Cap is shown in Figure 3.

**Figure 4**  
**Drain Valve Configured to Drain into Drop Tube** [Renamed Figure 2 to replace Figure 4]  
**Figure 2**  
**Drop Tube Leak Rate Test Assembly**



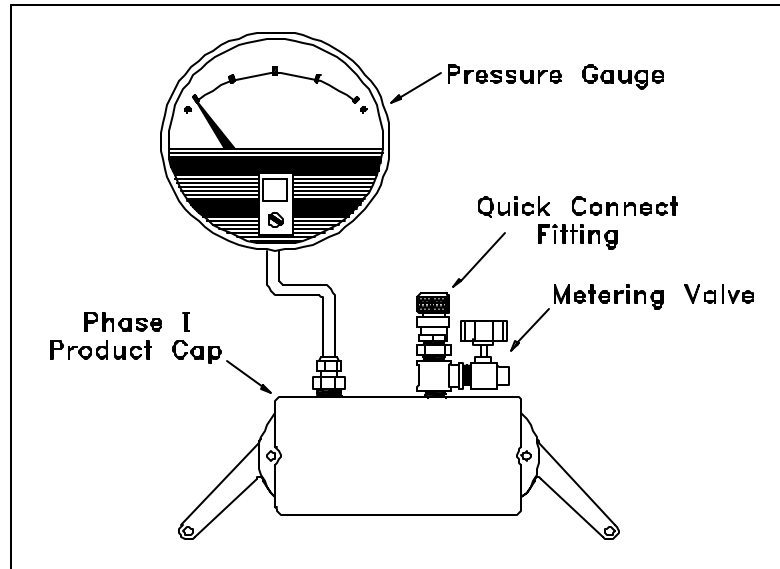
## 6. PRE-TEST PROCEDURES



- ~~6.1~~ The flow meter and pressure gauge and ~~pressure-measuring device~~ shall be calibrated within ~~the 180 days~~ six (6) months prior to conducting the testing. The flow meter(s) shall be calibrated for ~~use with~~ use with ~~using~~ nitrogen. Calibrations shall be conducted in accordance with EPA or CARB protocols. ~~{CARB calibration methodology for flow meters and pressure gauges are contained in Appendix D of Air Monitoring Quality Assurance, Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing, January 1979.}~~
- ~~6.2~~ ~~All pressure measuring device(s) shall be bench calibrated using a reference gauge, incline manometer or NIST traceable standard at least once every six (6) months. Calibration shall be performed at 20, 50, and 80 percent of full scale. Accuracy shall be within five (5) percent of each of these calibration points.~~
- ~~6.23~~ Place the ~~traffic cones or caution tape~~ around the perimeter of the Phase I spill containment buckets, ~~containers~~ allowing sufficient space to safely conduct the testing.
- ~~6.342~~ Remove the lids of the Phase I ~~from the spill containment buckets~~ containers and inspect the drain valve configuration. ~~Visually determine that the drop tube is installed below the spill containment bucket and that the drain path allows liquid to drain directly into the drop tube. Verify that the drain valve passes if the drain valve exits~~ liquid directly into the drop tube, as shown in Figure 1, rather than into the storage tank ullage space.
- ~~6.4~~ Inspect the Phase I product adaptor to ensure that the gasket is intact and that the adaptor is securely attached to the Phase I product stem.
- ~~6.5~~ Verify that the liquid level in the storage tank is at least four (4) inches above the highest opening at the bottom of the submerged drop tube using the tank gauging stick.
- ~~6.6~~ Inspect the drain valve configuration. Verify that the drain valve drains liquid directly into the drop tube above the Overfill Prevention device, as shown in Figure 4, rather than into the underground storage tank ullage space. If the drain valve drains into the underground tank ullage space, this procedure will only quantify the leak rate through the connections.
- ~~6.3~~ Inspect the Phase I product adaptor to ensure that the gasket is installed and that the adaptor is securely attached to the Phase I product riser.

[Modified to Add Figure]

**Figure 3**  
**Product Adaptor Test Cap**



## 7. TEST PROCEDURE

~~7.1~~ Connect the Pressure Introduction Drop Tube Test Assembly to the Phase I product drop tube adapter as shown in Figure 12. Connect the nitrogen supply line to the inlet of the flowmeter.

~~7.2~~ Connect the Vapor Poppet Pressure Relief Assembly to the Phase I vapor poppet to bring the UST headspace to atmospheric pressure.

~~7.32~~ With no vehicle refueling occurring, open the nitrogen supply and adjust the nitrogen flowrate to at least three times the maximum allowable leakrate specified in CP-201, 0.42 CFH (200 ml/min) and proceed to 7.3, and start the stopwatch.

~~7.43~~ Wait until the pressure measuring device records a pressure between 2.00 and 2.20 inches H<sub>2</sub>O. Start the stopwatch for a maximum of five minutes or until the pressure gauge reads 2.10 inches H<sub>2</sub>O. Record the pressurization time on the data sheet and proceed accordingly as follows:

~~7.43.1~~ If the pressure does not reach at least 2.00 inches H<sub>2</sub>O within 180 seconds, the Drop Tube/Drain Valve Assembly does not comply with the maximum allowable leakrate. If the pressure did not reach 2.10 in. H<sub>2</sub>O within 5 minutes, the device does not comply with the maximum allowable leak rate.

~~7.43.2~~ If the pressure reaches at least 2.00 inches H<sub>2</sub>O, reduce the introduction of nitrogen to the allowable leakrate specified in CP-201. Wait until the pressure reaches steady state conditions for at least ten (10) seconds and record both the nitrogen flowrate and the steady state pressure. If the steady state

~~pressure is less than 2.00 inches H<sub>2</sub>O, the Drop Tube/Drain Valve Assembly does not comply with the maximum allowable leakrate. If the pressure reached 2.10 inches H<sub>2</sub>O within five (5) minutes, reduce the nitrogen feed to the maximum allowable leak rate listed in CP-201 for the device and observe the pressure gauge for one minute (1 min.). If the one minute (1 min.) final pressure is less than 2.00 inches H<sub>2</sub>O, the device does not comply with the maximum allowable leak rate.~~

~~7.4.3 If the Drop Tube/Drain Valve Assembly does not reach the minimum specified pressure, use a soap solution on the rotatable adaptor to check for leaks at the rotation mechanism or the adaptor seal.~~

~~7.4 Record the one minute final pressure on the data sheet.~~

7.1 Carefully install the inflatable bladder into the drop tube as shown in Figure 1 and inflate.

7.2 Connect the Product Adaptor Test Cap to the Phase I product adaptor and connect the flow meter and pressure gauge to the test cap as shown in Figure 2.

7.3 Open the nitrogen supply and adjust the nitrogen flow to a rate no greater than the maximum allowable leak rate specified for the drain valve in CP-201 and start the stopwatch for a maximum of 5 minutes.

7.4 Wait until the pressure gauge indicates a pressure equal to the performance specification pressure for the drain valve as defined in CP-201.

7.4.1 If the pressure gauge does not indicate the specified pressure within 5 minutes, the drain valve does not comply with the maximum allowable leak rate specification.

7.4.2 If the pressure gauge indicates the specified pressure within 5 minutes immediately reduce the nitrogen flow in order to stabilize at the specified pressure ( $\pm 0.05$  inches H<sub>2</sub>O) for 30 seconds.

7.5 Record the flow rate required to stabilize at the pressure specified in CP-201.

7.5.1 If the final flow rate is below the detectable limit of the flow meter, record the lowest measurable flow rate and final pressure on the data sheet.

7.5.2 If the final flow rate is greater than the capacity of the flow meter, record the highest measurable flow rate and final pressure.

## 8. POST-TEST PROCEDURES

~~8.1 Remove the Pressure Introduction Assembly and the Vapor Poppet Pressure Relief Assembly from the Phase I connections. Replace the caps on the appropriate Phase I adaptors, and the lids on the appropriate spill containment buckets. Drop Tube Test~~

~~Assembly from the Phase I area and store in a protected location to prevent damage to instruments.~~

~~8.2 Remove the traffic cones from the Phase I area. Replace the caps on the appropriate Phase I adaptors, and the appropriate lids on the spill containers.~~

~~8.3 If the steady-state pressure, at a nitrogen flowrate rate equal to the allowable leakrate, was not equal to or greater than 2.00 inches H<sub>2</sub>O, Equation 9-1 may be used to determine the leakrate at 2.00 inches H<sub>2</sub>O. Remove the traffic cones or caution tape from the Phase I area.~~

8.1 Carefully remove the Product Adaptor Test Assembly and the Inflatable Bladder from the Phase I drop tube.

8.2 Replace the caps on the appropriate Phase I adaptors, and the appropriate lids on the spill containers.

## 9. CALCULATING RESULTS

9.1 If the flow\_rate of N<sub>2</sub>nitrogen was at the upper limit of the flow\_meter and the measured pressure never reached ~~2.00 inches H<sub>2</sub>O~~the specified pressure, but was greater than 0.0 inches H<sub>2</sub>O, the actual leak\_rate at a specified pressure ~~of 2.00 inches H<sub>2</sub>O shall may shall~~ be calculated as follows:

$$Q_{2.00} = (2.00)^{1/2} \left[ \frac{Q_{actual}}{(P_{actual})^{1/2}} \right] \quad \text{Equation 9-1} \quad \text{[proposed deletion]}$$

$$Q_{SP} = (SP)^{1/2} \left[ \frac{Q_{actual}}{(P_{actual})^{1/2}} \right] \quad \text{Equation 9-1} \quad \text{[proposed adoption]}$$

Where:

~~Q<sub>2.00SP</sub>~~ = The leak\_rate of the ~~drop tube assembly at 2.00 inches H<sub>2</sub>O~~component at the specified pressure, cubic feet per hour

Q<sub>actual</sub> = The actual ~~introduction flow~~rate of nitrogen, cubic feet per hour

P<sub>actual</sub> = The actual measured steady-state pressure at Q<sub>actual</sub>, inches H<sub>2</sub>O

~~2.00SP~~ = Specified Pressure, defined in CP-201, inches H<sub>2</sub>O

9.2 Commonly used flow rate conversions:

$$\underline{1 \text{ CFH} = 471.95 \text{ ml/min}}$$

$$\underline{\text{Example: Convert 0.17 CFH to ml/min: } 0.17 \text{ CFH} \times 471.95 = 80 \text{ ml/min}}$$

$$\underline{1 \text{ ml/min} = 0.00212 \text{ CFH}}$$

Example: Convert 100 ml/min to CFH: 100 ml/min x 0.00212 = 0.21 CFH

<b>Commonly Used Flow Rate Conversions</b>	
<u>0.05 CFH = 24 ml/min</u>	<u>0.21 CFH = 100 ml/min</u>
<u>0.17 CFH = 80 ml/min</u>	<u>0.34 CFH = 160 ml/min</u>

## 10. REPORTING RESULTS

~~10.1~~ Report the results of the quantification of the leak rate through the drop tube/drain valve assembly as indicated ~~quantification of the leakrate through the Drop Tube/Drain Valve Assembly as shown~~ ~~Drop Tube/Drain Valve test~~ on Form 1. Districts may require the use of alternate forms, provided they include the same minimum parameters as identified on Form 1.

## 11. ALTERNATE PROCEDURES

~~11.1~~ This procedure shall be conducted as specified. Modifications to this test procedure shall not be used to determine compliance unless prior written approval has been obtained from the CARB Executive Officer, pursuant to Section 14 of ~~Certification Procedure CP-201~~ (Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities).

**Form 1-** [Form is to be replaced with new Form 1]

**Field Data Sheet**

**Pressure Integrity Of Drop Tube/Drain Valve Assembly**

Facility:	Test Date:	Tester(s):
Address:	City:	Zip Code:
Phase I System Type:	Phase II System Type:	
Date of Last Flowmeter Calibration:	Date of Last Pressure Device Calibration:	

**Test Results**

Product Grade	Nitrogen Flowrate (CFH)	Pressure (inches H <sub>2</sub> O)	Make/Model Spill Containment Bucket	Make/Model Rotatable Product Adapter	Make/Model Rotatable Vapor Adapter

<i>Comments:</i>

**Form 1**

**Drop Tube/Drain Valve Assembly Data Sheet**

Facility:	Test Date:	Tester(s):
Address:	City:	Zip Code:
Spill Container Make & Model:		
Date of Last Flow Meter Calibration:	Date of Last Pressure Gauge Calibration:	

**Test Results**

Product Grade	Pressurization Flow Rate (CFH)	Time Required to Pressurize to 2.10 in. H <sub>2</sub> O (seconds)	1 Minute Flow Rate (CFH)	1 Minute Final Pressure (in. H <sub>2</sub> O)

<b>Comments:</b>

**TP-201.1C Form 1 [New proposed Form 1]  
Drop Tube/Drain Valve Assembly Data Sheet**

Facility:	Test Company:	Test Date:
Address:	Test Personnel:	
City:	State, Zip Code	
Overfill Prevention Make & Model:	Spill Container Make & Model:	
Date of Last Flow Meter Calibration:	Date of Last Pressure Gauge Calibration:	

**Test Results**

Device Type & Product Grade	Time to Pressurize	30-Second Flow rate (CFH)	30-Second Pressure (in. H <sub>2</sub> O)

<i>Comments:</i>



