

**Jeffery Yang**

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**From:** KEVIN J. WILLIAMS  
**Sent:** Tuesday, December 23, 2008 4:37 PM  
**To:** Jeffery Yang; ALETA KENNARD  
**Subject:** FW: EPA No comment on Sacramento 445 & 449

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**From:** Steckel.Andrew@epamail.epa.gov [mailto:Steckel.Andrew@epamail.epa.gov]  
**Sent:** Tuesday, December 23, 2008 2:28 PM  
**To:** KEVIN J. WILLIAMS; mguzzett@arb.ca.gov  
**Cc:** alpete99@comcast.net  
**Subject:** EPA No comment on Sacramento 445 & 449



**United States Environmental Protection Agency**

**Region IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

**December 23, 2008**

**Transmittal of EPA Rule Review Comments**

**To:** Kevin Williams, Sacramento Metropolitan Air Quality Management District  
kjwilliams@airquality.org

Mike Guzzetta, California Air Resources Board  
mguzzett@arb.ca.gov

**From:** Andrew Steckel, Rulemaking Office Chief  
steckel.andrew@epa.gov

**Re:** SMAQMD Rule 448 – Gasoline Transfer into Stationary Storage Containers and SMAQMD Rule 449 – Transfer of Gasoline into Vehicle Fuel Tanks, DRAFT rules of December 12, 2008

We have completed a preliminary review of the draft rules identified above and have identified no significant concerns. Please direct any questions in this regard to me at (415) 947-4115 or to Alfred Petersen at (415) 947-4118.

**STATE OF CALIFORNIA  
ENVIRONMENTAL PROTECTION AGENCY  
AIR RESOURCES BOARD**



P. O. Box 2815  
Sacramento, California 95812

December 29, 2008

**Transmittal  
of  
ARB Staff Rule Review Comments**

**To:** Mr. Kevin Williams,  
Program Coordinator  
Sacramento Metropolitan Air Quality Management District  
Telephone Number: (916) 874-4851  
e-mail: [kjwilliams@airquality.org](mailto:kjwilliams@airquality.org)

**From:** Alex Krichevsky, (916) 324-6222  
e-mail: [akrichev@arb.ca.gov](mailto:akrichev@arb.ca.gov)

The following draft rules, which are scheduled for a public workshop to be held by your District staff on January 13, 2009, were received by us on December 12, 2008, for our review:

Rule 448	Gasoline Transfer into Stationary Storage Tanks
Rule 449	Transfer of Gasoline into Vehicle Fuel Tanks

We have reviewed the rules and have the comments on the following page. We believe that our comments are important to the effectiveness and enforceability of Rule 449.

If you have any questions about our comments, please contact Mr. Angus Macpherson, Manager of the Testing and Certification Section, Evaporative Controls and Certification Branch, Monitoring and Laboratory Division at (916) 445-4686.

**Rule review comments are on the following page**

Date: December 29, 2008

Air Resources Board Staff Comments on  
Sacramento Metropolitan Air Quality Management District  
Draft Rules 448 and 449

Rule 448 Gasoline Transfer into Stationary Storage Tanks

We have no comments on this rule.

Rule 449 Transfer of Gasoline into Vehicle Fuel Tanks

1. Section 301.1: Table 4-1 in ARB Vapor Recovery Certification Procedure CP-201 requires 95% by weight control efficiency and an emission factor < 0.38 lb/1000 gal for summer fuel. Therefore, we recommend to change this section to read as follows:

For summer fuel, a gasoline vapor control efficiency of at least 95% by weight ~~or~~ and a mass emission factor not exceeding 0.38 pounds of gasoline vapors per 1,000 gallons of gasoline dispensed.

2. Section 301.2: Table 4-1 in ARB Vapor Recovery Certification Procedure CP-201 requires 95% by weight control efficiency or an emission factor < 0.38 lb/1000 gal for winter fuel. Therefore, we recommend to change this section to read as follows:

For winter fuel, a gasoline vapor control efficiency of at least 95% by weight and ~~or~~ a mass emission factor not exceeding 0.38 pounds of gasoline vapors per 1,000 gallons of gasoline dispensed.

**Jeffery Yang**

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**From:** Carney. Karen [carneyk@SacCounty.NET]  
**Sent:** Thursday, January 15, 2009 3:37 PM  
**To:** Jeffery Yang  
**Subject:** January 13, 2009 SMAQMD Workshop Questions  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Jeffery,

Under Rule 448, 306.1, regarding maintenance inspections, how will the owner/operator be able to verify:

- If the spill containment drain valve is vapor tight?
- If the poppet valve is damaged? Should we actually compress it to see?
- If the submerged fill pipe is missing or damaged?

*Thank You,*

***Karen C. Carney***

Environmental Specialist  
County of Sacramento, Department of General Services  
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Mather, CA 95655  
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**Jeffery Yang**

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**From:** KEVIN J. WILLIAMS  
**Sent:** Friday, January 30, 2009 2:11 PM  
**To:** ALETA KENNARD; Jeffery Yang  
**Subject:** FW: EPA no comment on Sacramento 448 & 449

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**From:** Steckel.Andrew@epamail.epa.gov [mailto:Steckel.Andrew@epamail.epa.gov]  
**Sent:** Friday, January 30, 2009 1:01 PM  
**To:** KEVIN J. WILLIAMS; mguzzett@arb.ca.gov  
**Cc:** alpete99@comcast.net  
**Subject:** EPA no comment on Sacramento 448 & 449



**United States Environmental Protection Agency**

**Region IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

**January 30, 2009**

**Transmittal of EPA Rule Review Comments**

**To:** Kevin Williams, Sacramento Metropolitan Air Quality Management District  
kjwilliams@airquality.org

Mike Guzzetta, California Air Resources Board  
mguzzett@arb.ca.gov

**From:** Andrew Steckel, Rulemaking Office Chief  
steckel.andrew@epa.gov

**Re:** SMAQMD Rule 448, Gasoline Transfer into Stationary Storage Containers; and Rule 449, Transfer of Gasoline into Vehicle Fuel Tanks, draft versions received on January 26, 2009

We have preliminarily reviewed the draft rules identified above and have identified no concerns. Please direct any questions in this regard to me at (415) 947-4115 or to Alfred Petersen at (415) 947-4118.

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1/30/2009