



August 26, 2010

VST Daily Nozzle Inspection Requirements

Enclosed is a copy of California Air Resources Board (CARB) Advisory 418, VST Nozzle Daily Check, dated May 28th, 2010. This advisory recommends VST nozzles be inspected daily. However, VST Executive Orders VR-203/204-XX have since been revised and now **require** all VST nozzles to be inspected daily pursuant to the Installation, Operation and Maintenance Manual for Executive Orders VR-203/204-H, section 2. The required daily inspections apply to VST systems installed per all versions of Executive Orders VR-203/204-XX, VR-205-XX and VR-209-XX. Please review the attached advisory for instructions on how to conduct daily nozzle inspections.

Please note that although the District is not revising your permit to reflect the new requirement at this time, the above referenced Executive Orders currently do require VST nozzles to be inspected on a daily basis. District staff will verify that daily inspections are conducted on all VST nozzles. Any nozzle which fails the daily inspection should be immediately removed from service. To assist you in complying with the new inspection requirements, the District has revised Attachment I (Inspection, ISD Alarm Response, Maintenance and Repair Log for Phase I and Phase II Systems) to include the VST daily nozzle inspections. VST daily nozzle inspections are required to be recorded on Attachment I of your District permit to operate and can be found on the District's website at: www.sdapcd.org/comply/vapor/VRattach.html.

Additionally, Advisory 418 may be found on CARB's website at: www.arb.ca.gov/vapor/advisories/advisories.htm.

For additional information regarding this advisory or any other vapor recovery matter, please contact Randy Smith at (858) 586-2677.

RGS:MJA:jlm

Attachments