



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**  
AUG 30 2004

400 Seventh St., S.W.  
Washington, D.C. 20590

Mr. William V. Loscutoff, Chief  
Monitoring and Laboratory Division  
Air Resources Board  
California Environmental Protection Agency  
P.O. Box 2815  
Sacramento, California 95812

Ref. No.: 04-0174

Dear Mr. Loscutoff:

Thank you for your letter of July 21, 2004, requesting our comments regarding potential changes the California Air Resources Board (CARB) may propose in some equipment on gasoline cargo tanks. The CARB is currently evaluating emissions of gasoline vapor from the operation of cargo tank trucks.

The CARB is studying emissions from three main sources: vapor and product delivery hoses; pressure-vacuum relief (p/v) valves; and degassing operations. The results of this study will be used in the development of regulations aimed at reducing the emissions from these potentially significant sources. Your ideas regarding potential equipment modifications involve the hoses and p/v valves. For example, you considered the use of caps installed on the ends of the hoses between delivery operations. Relative to p/v valves, because venting may occur during hot, sunny conditions, with the valve operating according to current "cracking pressure" standards, you have considered the potential of increasing that standard. At this time, you are seeking comments on this issue.

The U. S. Department of Transportation (DOT), Research and Special Programs Administration's Office of Hazardous Materials Safety is the agency responsible for issuing and interpreting the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180), which establish requirements for transporting hazardous materials in intrastate, interstate, and foreign commerce. The HMR prescribe packaging requirements, such as specifications for the manufacture and testing of cargo tank motor vehicles used to transport hazardous materials (e.g., gasoline).

Because DOT has the authority to issue safety requirements for cargo tank motor vehicles used to transport gasoline, any regulations established by a State in regard to modifications or changes to cargo tank motor vehicles must be substantively the same as the DOT's regulations. If the study demonstrates need for change in current regulations, you may petition for rulemaking in accordance with 49 CFR 106.95 and 106.100.



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178.320  
180.405

Thank you again for your interest in transportation safety and keeping us informed as the study progresses. We look forward to your future input when more conclusive results become available.

Sincerely,

A handwritten signature in cursive script that reads "Walter L. Mitchell".

*for* Edward T. Mazzullo  
Director, Office of Hazardous  
Materials Standards



Terry Tamminen  
Agency Secretary

# Air Resources Board

Alan C. Lloyd, Ph.D.  
Chairman

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Arnold Schwarzenegger  
Governor

July 21, 2004

Mr. Edward T. Mazzullo, Director  
Office of Hazardous Materials Standards  
United States Department of Transportation  
DHM-10  
400 7<sup>th</sup> Street, S.W.  
Washington, DC 20590-0001

Engram  
\$178,320  
\$180,405  
Cargo Tanks  
04-0174

Dear Mr. Mazzullo:

The purpose of this letter is to notify you early in the process that the California Air Resources Board (ARB) may propose changes in some equipment on gasoline cargo tanks. Because your office may have concerns regarding these changes, we are seeking your comments at this time.

The ARB is currently evaluating emissions of gasoline vapor from the operation of cargo tank trucks. Specifically, we are studying the emissions from three main sources: vapor and product delivery hoses; pressure-vacuum relief (p/v) valves; and degassing operations. The results of this study will be used in the development of regulations aimed at reducing the emissions from these potentially significant sources.

Although the emissions study is still progressing, our initial thoughts regarding potential equipment modifications involve the hoses and p/v valves. For example, we have considered the use of caps installed on the ends of the hoses between delivery operations. Regarding p/v valves, we have concerns that significant venting may occur, especially during hot, sunny conditions (which coincides with ozone season) with the valve operating according to current "cracking pressure" standards. Thus, we have considered the possibility of increasing that standard to some degree.

We will keep you informed as the study progresses and more conclusive results become available. If you have questions regarding the details of this emissions study or related regulation development, please feel free to contact Ranjit Bhullar, Manager of the In-Use Vapor Recovery Section at (916) 322-0223 or via e-mail at [rbhullar@arb.ca.gov](mailto:rbhullar@arb.ca.gov).

Sincerely,

William V. Loscutoff, Chief  
Monitoring and Laboratory Division

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: <http://www.arb.ca.gov>.

California Environmental Protection Agency