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CARB staff contention: Balance systems are certified at 95 percent and operate at 90 percent overall efficiency when Stage I and Stage II processes are combined.

Facts: Balance systems now in use were certified under the old Method 2-1, a statistical procedure. Since the development of the current mass balance based TP201.2 in 1991, balance systems have not been retested. A major procedural change such as TP201.2 should have resulted in a decertification of older systems and a retesting requirement under the four-year grandfathering provisions. In late 1992, the Oregon DNR tested balance nozzles using TP201.2 in its draft version. The tests were conducted by VOC, California's primary test laboratory at the time, and supervised by CARB's Monitoring Division. Resulting efficiencies were below 90 percent for most nozzles (one reached 95 percent).

Recent certification testing of balance systems in Missouri has resulted in two nozzle certifications at 95 percent using procedure derived from TP201.2.

A recent analysis by the San Diego AQMD of actual emissions from Stage I and Stage II processes estimates overall efficiency to be about 75 percent. While the data is preliminary and will be refined in the future, it shows a significant discrepancy between assumed performance levels and field observations.

It's time for change

CARB's arguments regarding performance advantages of balance over assist systems are clearly not substantiated by facts. Moreover, for years CAPCOA has requested the assistance of CARB in solving significant operational problems with balance systems, including low vapor recoveries and system tightness problems. The recent test results have prompted at least one AQMD to require annual balance system testing beginning in January 2000.

It is high time for CARB staff to recognize its responsibility to address all potential emissions problems, and not concentrate solely on assist vapor recovery systems.

Wolf Koch *is founder and President of Technology Resources International, Inc. in Batavia, Illinois. He provides services in technology planning, product development and testing and litigation support. He is an expert in retail service station technology, product distribution and natural gas vehicles and associated fueling systems.*