

**Contact Report  
Gasoline Area Source**

**From:** Julia Cavalier, MACTEC Federal Programs  
**Date:** November 3, 2003  
**Contact:** Mr. Bradley Cole  
**Organization:** California Air Resources Board (CARB) Enforcement Division,  
Sacramento, CA  
**Telephone Number:** (916) 322-3951

---

**Contact Summary:**

I had called CARB to obtain information about gasoline vapor testing procedures for gasoline tank trucks. California regulations mandate that all gasoline cargo tanks be tested annually for vapor tightness. California has also developed a "daily" vapor tightness test during which tank trucks must meet static pressure performance values that are less strict than those for the annual test. Enforcement agents can mandate that a tank perform the daily standard at any time. The limits established for the annual vapor tightness test are twice as strict as those outlined in the federal gasoline NESHAP. I attempted to determine: a) how often tanks were subject to the daily vapor tightness test, b) the success rates of tanks being tested (by both the daily and annual vapor tightness tests), c) why had the tests currently in use been chosen, and d) had any cost studies been performed on the California vapor tightness certification and testing procedures before implementation.

My initial call was returned by Mr. Brad Cole. He manages the Gasoline Vapor Recovery Enforcement Program in California. He provided the following information about cargo tanks in California. In 2002, there were:

5100 cargo tanks in California

1622 daily tests were performed

He also informed me that approximately 10% of tank trucks typically failed the annual vapor tightness test. CARB enforcement officials have not found the daily test to be particularly reliable. Static pressure in the tank is monitored, and this is followed by internal vapor valve performance measurements. The internal vapor valves often get stuck during the procedure, and in Mr. Cole's words, the truck could fail the test and then "drive around the block to loosen the valves" and then pass.

Mr. Cole also mentioned that those being regulated have been quite frustrated with the test. Representatives of the cargo tank industry have stated that they do not understand how the daily test relates to the annual test. Due to these concerns and the problems with the testing method, Mr. Cole speculated that the tank truck vapor tightness testing methods might be revisited in the future. Possible changes might include changing the method so that pressure is tested using existing exterior valves or butterfly valves. The daily test limits might also be changed to match annual limits, or vapor tightness tests might be tested more frequently.

He was unable to provide much insight as to why the vapor tightness tests were chosen. They were adopted during the 1980's, and the motivation for doing so is no longer clear. He was also unable to confirm whether or not a cost effectiveness analysis had been performed for the test procedures, and recommended that I contact Bob Fricker of the CARB Enforcement Division at (916) 322-6956 or [rfricker@arb.ca.gov](mailto:rfricker@arb.ca.gov). Mr Fricker is approaching retirement and was probably involved in the initial implementation of the testing procedures.

If I were searching for information on vapor tightness testing for bulk gasoline plants and terminals, Mr. Cole recommended I contact either Ranjit Bhullar (919-322-0223) or Paul Falcon (916-445-9499).