

02/01/1980

VOC110201801

Category: 11 – Stage I Vapor Recovery Roof Tanks

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D C. 20460

Feb 1, 1980

SUBJECT: Effect of Imposition of RACT on Delivery of Gasoline
Vapor Recovery Systems

FROM: Director, Division of Stationary Source Enforcement

TO: Enforcement Division Directors, Regions I-X
Air & Hazardous Materials Division Directors, Regions I-X

At the workshop on the Gasoline Marketing Chain held in Chicago November 15-16, 1979, Regional personnel expressed concern regarding the impact of imposition of the SIP revisions on the capability of vapor recovery system manufacturers to deliver new systems. Pacific Environmental Services was asked to look into this question and a summary of their findings is included for your information and use in reviewing SIP compliance dates.

Edward E. Reich

Attachment

Attachment

January 9, 1980

Mr. Robert L. King
Environmental Protection Agency
EM-314-DSSE
401 M Street, S.W.

Washington, D.C. 20460

Dear Mr. King:

Attached is a list of companies that have manufactured or are presently manufacturing vapor recovery systems (VRS) for the gasoline marketing chain. All were contacted concerning the present status of their production of VRSs. Manufacturers representatives were questioned on the lead times necessary to install their vapor recovery system(s) and how the lead time for installation might change once the new SIPs are approved. They were also asked if they had performed any reliability studies on the equipment they had produced. This information is summarized in the attached table.

Generally, the companies contacted indicated that only a slight increase in lead time is anticipated once the new SIPs are approved. This response did not come as a surprise. No company in a competitive situation would want to indicate a problem in meeting future demand for its product. This would indicate poor planning on the company's part and might have a tendency to turn possible customers toward competitors. Only Trico Superior indicated the possibility of a significant increase (about 50 percent), while Edwards Engineering even alluded to a possible reduction in delivery lead time. At present the lead time ranges from 4 to 15 months, with an average of 8 months.

Two of the firms, Southwest Industries and Parker-Hannifin, are no longer manufacturing vapor recovery systems. Both of these firms indicated that facilities that have their equipment installed must use an outside firm for maintenance. Also, the representative from Parker-Hannifin indicated that another firm, A.C.L.FILCO, has purchased Parker-Hannifin's VRS line.

Other firms contacted indicated that maintenance on the units is normally performed by the purchaser or contracted to a maintenance company.

Pacific Environmental Services, INC. * 1930 14th Street * Santa Monica, CA

Mr. Robert L, King

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January 9, 1980

Some of the companies indicated that reliability studies have been performed on their equipment. We are attempting to obtain results of these studies for presentation to you later this month.

If you have any questions or need additional information, please do not hesitate to call either Bob Gordon or me at (213) 450-1800.

Yours truly,

Timothy L. Antonoplos
Environmental Engineer

TLA:nh

Attachment

Attachment

VAPOR RECOVERY SYSTEMS (VRS) RELIABILITY STUDY

Manufacturer	Type of VRS	Lead Time (Present)	Change in Lead Time (Pending SIP Approval)	Reliability Studies Performed
1. AER Corporation	Incineration	16 to 26 weeks	Same	Yes
2. Baker-Perkin	Carbon Absorption	6 months	Increase	Yes
3. Dress Wayne	Compression - Refrigeration Condensation	*	*	*
4. Edwards Engineering Corporation	Refrigeration	60 weeks	Decrease	No
5. Hirt Combustion Engineers	Incineration	5 to 6 months	Unknown	No
6. Hydrotech	Carbon Absorption	32 weeks	Same	No
7. National Air Oil Burner Company, Inc.	Incineration	18 to 24 weeks	Slight increase	No
8. Parker-Hannifin	Compression - Refrigeration Absorption	**	**	**
9. Southwest Industries	Lean Oil Absorption	**	**	**
10. Tenney Engineering, Inc.	Refrigeration	9 months	Same	No
11. Trico Superior	Compression - Refrigeration Absorption	6 to 10 months	9 to 15 months	Yes

* Will not disclose any information

** No longer manufactures VRS