

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To: Roger Vaughan
Technical Service

Date: 05/18/05

From: Stage I & II Vapor Recovery Committee

Subject: Texas Test Procedure -105: Liquid Removal Device (Vapor Recovery Test Procedures Handbook, RG-399, November 2002).

Issue

Several Stage II testing companies have expressed concerns and/or problems with Texas Test Procedure (TXP)-105: (Vapor Recovery Test Procedures Handbook, RG-399, November 2002). It is confusing, has conflicting and/or unnecessary steps, and is extremely complicated to conduct.

Committee Decision

The Texas test procedure for 105: was based upon the California Air Resource Board's (CARB) test procedure for Liquid Removal Devices. At the time Texas developed the handbook, CARB's version was only in draft form, and included a mandatory test of each nozzle and included testing at three different flow rates. After Texas had finished developing the handbook, CARB updated their test procedure to only include testing at one maximum flowrate, as well as adding a step to determine if the test is really needed at each nozzle. The Stage II committee has decided that until the Texas test procedure handbook can be updated, CARB test procedure TP-201.6C can be used in lieu of TXP 105:, if desired. Regardless of which test procedure is used, this test, when applicable, must be conducted on a yearly basis as stated in the test procedure handbook.