



On August 29, 2023 the California Air Resources Board (ARB) issued the approval of the Healy 900 nozzle as a replacement component for the Healy Model 400 nozzle, listed in Executive Order (EO) G-70-187, Healy 400 ORVR Vapor Recovery System for Aboveground Storage Tank Systems. ARB's approval letter is attached to this Compliance Assistance Bulletin.

Please note that the testing requirements for the Healy 900 nozzle differ from the Healy 400 nozzle. **Facilities with G-70-187 systems that choose to install the Healy 900 nozzle must first apply for and receive an Authority to Construct from the San Joaquin Valley Air Pollution Control District (District) prior to installing the nozzle.** The Healy 900 nozzle must be installed, operated, maintained, and tested in accordance with the most current version of EO VR-201, which includes conducting and passing start-up testing within 60 days of beginning operation with the new nozzle.

Information on ARB executive orders can be found at:

<https://ww2.arb.ca.gov/our-work/programs/vapor-recovery/vapor-recovery-executive-orders>

District **Authority to Construct / Permit to Operate Applications**, and **Gasoline Dispensing Supplemental Application Forms** can be found at:

<https://ww2.valleyair.org/permitting/application-forms/application-forms>.

If you have any questions or would like additional information regarding the application process, please contact the District's Small Business Assistance hotline at the numbers listed below:

**Bakersfield: 661-392-5665**

**Fresno: 559-230-5888**

**Modesto: 209-557-6446**

**Northern Region**

4800 Enterprise Way

Modesto, CA 95356-8718

Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**

1990 E. Gettysburg Avenue

Fresno, CA 93726-0244

Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**

34946 Flyover Court

Bakersfield, CA 93308-9725

Tel: 661-392-5500 FAX: 661-392-5585

August 29, 2023

Mr. Heber Silva  
Engineering Design Director  
Franklin Electric - Fueling Systems  
3760 Marsh Road  
Madison, Wisconsin 53718  
[HSilva@fele.com](mailto:HSilva@fele.com)

Dear Mr. Silva,

Thank you for the letter dated August 20, 2019, in which Franklin Fueling Systems (FFS), requested the California Air Resources Board (CARB) amend Executive Order (EO) G 70 187, Healy Model 400 ORVR Vapor Recovery System for Aboveground Storage Tank Systems (Healy 400 ORVR VR System), to include the Healy Model 900 (Healy 900) EVR nozzle as an approved replacement component. The reason for this request is that FFS no longer manufactures the Healy Model 400 ORVR nozzle or its components. The Healy 900 nozzle is currently certified and listed in Exhibit 1 of the most current version of EO VR-201, Assist Phase II Enhanced Vapor Recovery (EVR) System.

CARB staff evaluation started with designating the following gasoline dispensing facility (GDF) as a test site to conduct compatibility testing:

Gasoline Dispensing Facility
City of Manteca 210 E Wetmore Avenue Manteca, California

CARB staff conducted various vapor recovery tests at the above test site with the Healy 900 nozzle in accordance with Test Procedures-206.3, Exhibit 4 of EO G-70-187 and Exhibit 5 of VR-201 for the 900 nozzle in lieu of Exhibit 5 and 6 of EO G-70-187. All tests were conducted prior to the seal date, October 19, 2022, and after the 60-day operational test period, January 12, 2023. The intent is to verify that the Phase I and Phase II systems comply with the requirements set forth in CP 206 and EO G-70-187. The results demonstrated that the Healy 900 nozzle complies with applicable requirements (see Certification Summary for more details).

Per Section 20 of CP 206, this letter constitutes CARB's approval of the Healy Model 900 as a replacement nozzle for the Healy 400 nozzle listed in EO G-70-187. This approval is contingent upon the Healy 900 nozzle being installed, operated, maintained, and tested in accordance with the most current version of EO VR-201, which include the provisions applicable to the Healy 900 nozzle listed in the following document:

1. Legal Language,
2. Exhibit 1, Equipment List,
3. Exhibit 2, System Specifications
4. Exhibit 3, Manufacturing Performance Standards and Specifications
5. Exhibit 5 (in lieu of Exhibit 5 and 6 of EO G-70-187), Vapor to Liquid Volume Ratio
6. Exhibit 7, Nozzle Bag Test Procedure
7. IOM 1, Systems Scheduled Maintenance, and
8. IOM 2, Nozzle - Healy Model 900

In addition to the above, the Healy 400 ORVR VR System with the Healy 900 nozzle shall comply EO G-70-187 Exhibit 3 (Static Pressure Integrity Test Aboveground Storage Tanks) and Exhibit 4 (Vapor Return Line Vacuum Integrity Test for the Healy 400 ORVR System).

If you have questions or need further information, please contact Mr. Tahir Muhammad at (279) 842-9683 or via email at [Tahir.Muhammad@arb.ca.gov](mailto:Tahir.Muhammad@arb.ca.gov) or Mr. Bradley Cole at (279) 208-7267 or via email at [Bradley.Cole@arb.ca.gov](mailto:Bradley.Cole@arb.ca.gov).

Sincerely,

**Walter Ham**  
Digitally signed by Walter Ham  
Date: 2023.08.29 12:15:12  
-07'00'

Walter Ham, Ph.D., Chief, Monitoring and Laboratory Division

Attachment

cc: (via email)

Jacqueline Huynh, Bay Area Air Quality Management District  
[jHuynh@baaqmd.gov](mailto:jHuynh@baaqmd.gov)

Bradley Fawcett, Franklin Fueling Systems  
[Bradley.Fawcett@fele.com](mailto:Bradley.Fawcett@fele.com)

Bradley Cole, Manager, Vapor Recovery Certification Section

Tahir Muhammad, Monitoring and Laboratory Division