

AIR POLLUTION CONTROL DISTRICT  
REGULATORY COMPLIANCE DIVISION

POLICIES AND PROCEDURES

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Topic: Gasoline Station Inspections

Distribution: All Policy Holders

This policy and procedure document provides guidelines on the inspection of Phase I and II vapor recovery systems (VRS) at gas stations. APCD Rule 316 regulates gas stations employing VRSs which are certified by the California Air Resources Board (CARB). The certification and the systems, which include fill tubes, fill caps, vapor lines, underground tanks, fuel dispensers, nozzles, hoses, and miscellaneous required parts, are described in detail in the CARB Compliance Assistance Program Handbook "Gasoline Facilities, Phase I and II." Potential emission points at a gas station include:

1. Gasoline storage and delivery
2. Fugitive emissions at point of transfer
3. Fugitive emissions at point of failure of transfer equipment

PROCESS DESCRIPTION

Phase I:

A Phase I VRS recovers hydrocarbon vapors displaced by fuel that is being delivered by tanker truck to a fueling facility. A fuel delivery truck will "drop" a load of fuel through a submerged fill tube that extends from an opening at the top of the tank to a point 6" or less from the bottom of the tank. The displaced vapors are recovered via a two-point system (a separate opening in the tank for vapor return), or via a coaxial system (a tube within a tube, where fuel is delivered through the center tube and vapors are collected from the outer area of the jacket tube).

Phase I vapor recovery reduces the amount of hydrocarbons released to the atmosphere. Because reactive hydrocarbons are a precursor to the formation of ozone, vapor recovery helps to decrease the formation of photochemical smog.

Phase II:

A Phase II VRS recovers hydrocarbon vapors displaced by fuel that is being delivered to a motor vehicle. Benzene and other aromatic hydrocarbons are present in today's fuel mixtures. Since these compounds are listed in California's Proposition 65 carcinogenic category, the use of Phase II vapor recovery has been mandated statewide as a control measure for toxics, as well as a control of precursors to ozone.

There are three types of Phase II vapor recovery systems currently certified by CARB: the balance system, the vacuum assist system, and the aspirator assist system. These systems can use several different types of nozzles, all of which have been approved by CARB to meet the minimum efficiency standard of 95% vapor recovery.

### **Inspection and Documentation Procedures for Weights and Measures (W&M) Deputy Sealers**

The Phase I and Phase II VRS inspections of retail gasoline stations and the VRS inspections of retail gasoline bulk loading facilities will be conducted by W&M Deputy Sealers once per calendar year. W&M personnel will provide to APCD a planned caseload at the beginning of each calendar quarter.

Privately owned non-retail facilities, those at Vandenberg Air Force Base, and other non-retail/non-sealed County facilities will be inspected by APCD inspectors. Public complaints concerning gasoline stations and/or gasoline bulk loading facilities and complaints referred through CARB will also be investigated by APCD inspectors.

W&M Deputy Sealers will conduct inspections of the Phase I and II vapor recovery systems according to the procedures set forth in the CARB Compliance Assistance Program Manual and this APCD policy and procedure.

W&M personnel are authorized to issue Notices to Correct (NTCs) for Phase I and II defects. They are also authorized to tag "Out of Service" Phase II defects according to APCD policy and procedure. Notices of Violation (NOVs) or other enforcement actions will be issued by APCD inspectors.

### **INSPECTION DOCUMENTATION**

Inspection results will be documented and submitted to the APCD on the Gasoline Vapor Recovery Inspection Form (APCD-37) and the Weekly Inspection Summary Form (ENF-50). Included with the reports will be any NTCs issued to a facility as well as the blue (top) copy of any "Out of Order" tags issued. Reports which document violations must be faxed within one day of the inspection to: x8801 (for South County stations) or x5012 (for North County stations). Other completed inspection reports (with NTCs or tags) will be sent on a weekly basis to, via "County Brown Mail" to the following locations:

#### for South County Stations

APCD - Goleta Office  
26 Castilian Drive, B-23  
Attn: Enforcement Supervisor

#### for North County Stations

APCD - Buellton Office  
240 E. Highway 246  
Attn: Enforcement Supervisor

## REINSPECTION FOLLOW-UP

### Notice to Correct (NTC)

If a 48-hour NTC is issued, the W&M inspector will follow-up no later than 24 hours upon expiration of the NTC.

If a 7-day NTC is issued, the inspector will follow-up no later than five calendar days upon expiration of the NTC.

If the NTC was issued for defects which could impair the vapor recovery system or lead to excess emissions, a physical reinspection at the site is necessary.

If the NTC was issued for non-emissions related defects, (i.e., missing vapor recovery nozzle instructions, 800 or local telephone number for complaints), follow-up may be conducted by telephone at the inspector's discretion. Telephone follow-up will be documented in an office contact report prepared by the inspector.

Reinspection documentation will be recorded on the Inspection Report Form (ENF-11). A copy of the 48-hour or 7-day NTC shall be attached. Note: Form ENF-11 should have the "Type of Inspection: Reinspection" box checked.

When the APCD receives the follow-up inspection report, it will be collated with the rest of the inspection report and will then be considered a "completed inspection" for billing purposes.

### Out of Order Tag

When an "Out of Order" tag is issued, it is important to include the phone number of the Weights and Measures office on the tag. It will be necessary for the source to notify Weights and Measures when the taggable defects have been corrected. When the equipment is reinspected, the inspector will retrieve the tags and include them with form ENF-11.

When a Phase I violation is observed, the storage tank is not physically tagged out of service. An "Out of Order" tag should be issued and given to the facility contact with instructions to complete the bottom half of the tag when corrections are made. The source should be directed to telephone Weights and Measures for a reinspection.

### Violations

If a Phase I or Phase II (three or more tags) violation exists, the following procedure will be used:

1. Complete form APCD-37 and forward (via fax) to the Enforcement Supervisor by the next day.
2. After being notified that the defects have been corrected, reinspect the facility and retrieve the signed copies of the tags.

3. Complete form ENF-11 and attach the retrieved tags with the report.

### Billing

Based on the "completed inspection reports" submitted weekly by Weights and Measures inspectors, at the end of each month the APCD will journal voucher to the Agricultural Commissioner monies based upon actual costs up to a rate of \$10.00 per nozzle inspected.

### INSPECTION PROCEDURES

The inspector should use the following procedure when conducting an inspection to insure that all emission points are covered. It is not necessary for elements designated for "APCD inspectors" to be done by W&M inspectors.

1. File Review (APCD Inspectors)
  - A. Review past inspection reports and enforcement actions.
  - B. Review all permit conditions.
  - C. Verify that all annual reports are received.
  - D. Verify that past enforcement actions were followed up.
  - E. If the facility was issued an Authority to Construct (ATC), the following should be verified prior to conducting a field inspection:
    1. Determine whether the ATC is valid. If construction on the project has not started within one year of the date of issuance, the ATC may no longer be valid. If contracts have been awarded and dates are scheduled for construction to begin, the ATC may be considered valid, provided this was done within one year of the ATC issue date.
    2. Verify that Source Compliance Demonstration Period (SCDP) conditions were met. Check documentation entered in the source file (usually an inspection report or VRS Pressure Drop and Liquid Blockage Tests or both will be in the file). Check with the AQ Specialist Aides with the RCD and the Engineering Section if expected information is not in the permit file.
2. Obtain access to the facility using procedures outlined in the RCD P&P #I.B (Access to the Facility).
3. Conduct a pre-inspection interview with the facility operator.
  - A. Verify that the permit is posted or readily available.

- B. Verify that the ownership of the facility is as stated in the permit.
- C. Verify that the PTO equipment description is the same as what is observed at the facility. If equipment is different than in the PTO description, verify that a PTO modification or an ATC was required.

Removal of equipment without replacement does not require an ATC or PTO modification, but should be noted on the checklist comments and referred to the Engineering Division.

- D. Fill in blanks on form APCD-37 (See attached Exhibit #1)
  - 1. Current phone number
  - 2. Full name and title of contact person
- E. Discuss permit conditions (APCD Inspectors only).
  - 1. Gasoline throughput limitation.
  - 2. Systems defect guideline (APCD-39), if required.
  - 3. Recent gasoline throughput.
- F. List any non-permitted equipment, such as waste oil tanks or propane tanks and their capacity.
- G. Obtain or verify current calibration certificate (Red Jacket system only).

4. Conduct a Phase I vapor recovery system inspection.

Consult the CARB Handbook Executive Order G-70-97 series for required components and configurations for each type of gasoline storage tank. Aboveground tanks - see Executive Orders G-70-128 through G-70-144.

- A. Open the access hatch of the underground or aboveground tank to be inspected. No vehicles should be idling their engines nearby nor should any flammable source be close when opening an access hatch.
  - 1. Verify that the fill cap maintains a vapor-tight seal and has a gasket.
  - 2. Inspect fill tube collar for cracks and wear points.
  - 3. Use the fill tube measuring tape device to determine the distance between the bottom of the fill tube and the bottom of the tank. (APCD Inspectors only)
  - 4. For coaxial fill points, determine that fill tubes are spring-loaded (required on tanks installed after 1977). There should be 1" - 1½" of play when the fill tube is depressed.

5. For two-point fill systems, check that the dry break poppet valve seal is vapor tight.
  6. Determine if the overflow/spill containment bucket is CARB certified. If the bucket has product in it, verify if the drain is operable. See CARB letters #92-12, 92-10 and 92-7.
- B. Locate the vent pipes (12 ft. height minimum).
1. Balance, Healy, Red Jacket systems are not manifolded.
  2. Hirt and Hasstech systems are manifolded together with safety "poppet valves".
  3. During a fuel delivery, vapors may vent for up to 30 seconds, but should then stop as the volume balance in the system is achieved.
- C. Supplemental inspection on Hirt and Hasstech systems
1. Hirt System - Negative pressure in the storage tank creates a vacuum.
    - a. Inspect control panel for the combustion chamber (pilot light, on/off switch). If either bulb is not illuminated, ask the attendant to switch bulbs. If when switched, the bulb illuminates, the system is in compliance. Do not reuse the defective bulb. If the bulb still does not illuminate, the system is malfunctioning.
    - b. Inspect the air compressor (minimum 45 psi).
    - c. Read the required vacuum gauge.
    - d. Inspect the processing unit (look for convection currents from burner stack).
  2. Hasstech System - Positive pressure in the storage tank and collection unit creates a vacuum.
    - a. Read the optional magnahelic gauge.
    - b. Look for heat convection from burner box.
    - c. Check that the circuit breaker is on (indicating system is operational).
    - d. Observe the inches of water column on the magnahelic gauge when you hear the vacuum pump motor start. Record the reading. Verify if the vacuum pump motor comes on within the range specified on the gauge. Record negative (-) or positive (+) inches H<sub>2</sub>O.

3. Diesel Tanks - The vent pipe on the diesel storage tank must not be manifolded with the gasoline tanks. This situation could result in gasoline vapors being absorbed into the diesel fuel.

5. Phase II Inspection

Consult the CARB Handbook Executive Order G-70-52 series for required components and configurations for each type of gasoline dispenser. This Executive Order also lists which certified components can be interchanged with various dispenser types. Consult the CARB Handbook for Executive Orders for aboveground gasoline storage tanks.

- A. Look for proper posting of VRS nozzle operating instructions and 800 or local telephone number for complaints (ENF-5).
- B. Inspect nozzle bellows for cuts, rips, or other defects which would impair the effectiveness of the vapor recovery system malfunction. Inspect general nozzle assembly. The following defects result in the nozzle being tagged "Out of Order".
  1. Tears or cuts in the boot totalling over 1".
  2. Tears or cuts in the face seal totalling over 1/4 of the circumference.
  3. Boots clamped or otherwise held in an open position.
  4. Leaking nozzles (three drops per minute constitutes a liquid leak).
  5. Any nozzle component found loose, missing, or disconnected, including but not limited to boots, face seals, face cones, check valve wires, diaphragm wires, and latching devices.
  6. Defective shut off mechanisms (insertion interlocks).
  7. Any missing attached components, including but not limited to certification tags, co-vents (liquid removal devices or "venturis"), clamps, and check valve wires.
  8. Missing or defective hold-open latches (48-hour Notice to Correct).
- C. Inspect hoses for defects and missing components or non-CARB certified components or configurations.
  1. Dual Hose Systems - Check for:
    - a. Frayed, cut, crimped, flattened, or patched vapor return hoses and/or other defects which allow vapors to escape or block the vapor return passage.

- b. Frayed, cut, crimped, flattened, patched, or leaking product hoses.
  - c. Missing hose ties.
  - d. Dispenser and nozzle end swivels frozen, stuck, leaking product, missing altogether or missing required stops.
  - e. In-line flow restrictors missing on Emco Wheaton installations.
  - f. Installation of non-CARB certified components.
2. Coaxial Hose Systems The product hose is located inside the coaxial hose outer shell. Check for:
- a. Frayed, cut, crimped, flattened, or patched hoses and other defects which may allow vapors to escape or block the vapor return passage.
  - b. Dispenser and nozzle end 360° swivels frozen, stuck, or missing, or that leak vapors or product.
  - c. Missing or inoperative co-vents, venturi valves, or other required components.
  - d. Any non-CARB certified components.

Note: Installation of breakaway couplings may result in some hoses being longer than certified. No enforcement action should be taken in these cases unless the vapor recovery system is impaired as a result. Hose configuration loops greater than 10" also require no enforcement action unless the vapor recovery system becomes impaired. An example of this would be if a significant low spot exists in the hose when stretched out for filling where condensed vapors may block the vapor return.

3. Retractors Dual & Coaxial systems

Check for broken retractors, missing components, ones which do not retract completely, and knotted retractor ropes which hinder the retractor from returning to the normal/non-use position.

6. Fuel Delivery Observation and/or Inspection (APCD only)

- A. Use ENF-10 (checklist), if available.
- B. Observe fuel delivery.
- C. Detail violation or compliance:

- 1. Verify that vapor recovery hookups are used and are correctly attached.



2. Verify that the vapor and gas lines are drained prior to disconnecting.
3. Verify that the Phase I VRS is working properly by noting whether fumes from the vent pipes stop within 30 seconds of the start of the drop.

D. Identify yourself to the driver.

E. Documenting a gasoline delivery violation:

1. Request log books and/or company identification.
2. Obtain driver's name.
3. Document information (i.e., truck number, license number, description of truck and driver).
4. Issue NOV to trucking company and include driver's name under Rule 316 and Health and Safety Code 41950 using RCD P&P #VII.A (The Notice of Violation).
5. Photograph violation if possible.

#### 7. Tank Truck Certification Requirements CHP/CARB

During a fuel drop compliance inspection an inspector must check for current certification tags that are required by both the CHP and CARB. When conducting this inspection, use ENF-10 to document compliance or violation. Out of state gasoline storage tank trucks may operate in California, but if a fuel drop is made with a fuel that has a Reid vapor pressure (RVP) of more than 4.0 pounds, a CARB certified vapor recovery system must be used.

The following is an example of the required CHP/CARB stickers that must be affixed to the passenger side of each gasoline tanker tank. If no sticker is evident, and/or the required companion paper certificate (or facsimile) is missing, an NOV may be issued (RCD P&P #VII.A). A cargo tank's vapor recovery certification expires when the decal expires. It expires at midnight on the last day of the month one year following the month of issuance. For example, a certificate issued in January of one year will expire on January 31<sup>st</sup> of the following year. The date of expiration is indicated by the year, color, and clipped corners of the decal. Each decal is color coded according to the quarter in which it was issued. Remember, the decal expires the year printed on the sticker.

<u>Quarter</u>	<u>Color Code</u>
1 <sup>st</sup> -January/February/March	Green
2 <sup>nd</sup> -April/May/June	Yellow
3 <sup>rd</sup> -July/August/September	Orange
4 <sup>th</sup> -October/November/December	White

Each decal is clipped as follows to indicate in which month the quarter expiration occurs:

- A. For the first month both top corners are clipped.
- B. For the second month the upper left corner is clipped.
- C. For the third month no corners are clipped.

The tank truck operator is in violation of Health and Safety Code Section 41962(g) if the certification is missing, unless the tank vehicle is used exclusively to service gasoline storage tanks which are exempt from Phase I vapor recovery requirements. After an NOV has been issued, the tank truck cannot carry gasoline again until it is determined to be in compliance. Vapor recovery systems on cargo tanks are regulated by the requirements contained in the "Certification and Test Procedures" in Title 17, Section 94004 of the California Code of Regulations.

A cargo tank must be certified annually. In order to be certified, a cargo tank must pass three tests to show that it meets certain leak-rate criteria: a pressure test, a vacuum test, and a test of the internal vapor valve.

#### ENFORCEMENT PROCEDURES

The following is to be used as a guideline to determine whether a gasoline station that is not in compliance requires a Notice to Correct (N/C), an out of order tag (TAG) or an NOV. An NOV will be issued for one or more Phase I violations.

## PHASE I: TWO POINT SYSTEM

<u>Component</u>	<u>Type of Defect</u>	<u>Enforcement Action</u>
Fill Tube	Broken fillcap	NOV
	Fillcap missing gasket	NOV
	Fillcap missing	NOV
	Damaged or worn fillcap	NTC
	Short fill tube (greater than 9" from tank bottom)	NOV
	Short fill tube (between >6" & 9" from tank bottom)	NTC
	Spill/overflow bucket drain inoperable	NTC
Dry Break	No valve gasket and no cap	NOV
	Valve not sealing and cap missing gasket	NOV
	No valve gasket (cap gasket OK)	NTC

## PHASE I: COAXIAL SYSTEM

<u>Component</u>	<u>Type of Defect</u>	<u>Enforcement Action</u>
Fill tube	Broken fillcap (holes or cracks)	NOV
	Fillcap missing gasket	NOV
	Fillcap missing	NOV
	Damaged or worn fillcap such that it appears to be loose even though in the locked position.	NTC
	Stuck in open position	NTC
	Stuck in closed position	NTC
	Short fill tube (greater than 9" from tank bottom)	NOV
	Short fill tube (between >6" & 9" from tank bottom)	NTC
	Spill/overflow bucket drain inoperable	NTC
Ventpipes	Under 12 ft height	NTC
	Less than/more than 3" diameter vent pipe	NTC
	Vent pipes manifolded (balance only)	NTC
	Vent pipes not manifolded	NOV
(Hirt & Hasstech)	Vent pipe manifold missing safety valve	NOV

PHASE II: An NOV is to be issued for three (3) or more taggable Phase II violations.

<u>Component</u>	<u>Type of Defect</u>	<u>Enforcement Action</u>
Nozzle Type	Uncertified nozzle	TAG
	Wrong diameter spout (13/16" for unleaded)	NOV
	(15/16" for leaded)	Notify Wts. & Measures
Nozzle Assembly	Uncertified component installed	TAG
	Boot - missing clamp or not securely attached to nozzle (not vapor tight)	TAG
	Boot has triangular-shaped or similar tear > 1/2 inch to a side	TAG
	Boot has hole > 1/2 inch in diameter	TAG
	Boot has hole < 1/2 inch in diameter	NTC
	Boot has slit > 1 inch in length	TAG
	Boot has slit < 1 inch in length	NTC
	Required boot spring is missing, broken, or distorted	TAG
	> 1/4 of circumference of face plate is incapable of a vapor seal or is missing	TAG
	Missing latch device (latch ring or bar)	TAG
	Trigger not working properly	NTC
	Automatic shutoff defective	TAG
	Check valve inoperative	TAG
Nozzle leaks gasoline	TAG	
Missing hold-open latch	NTC (48 hr)	
Dual Product/ Vapor Hose	Uncertified component	TAG
	Product hose leaks gasoline	TAG
	Vapor hose is crimped or flattened such that the vapor path is blocked	TAG*
	Vapor hose leaks vapor	TAG
	Hose ties, loose, or missing	NTC
	Required swivels are missing, missing stops (dispenser end), or are frozen	NTC
	Swivel leaks liquid	TAG
	Required flow restrictor missing, or installed backwards (EMCO Wheaton assemblies only)	TAG
	Frozen or missing ball check valve (Hirt System only)	TAG
	Uncertified swivel	NTC
	No venturi/liquid removal system (where required)	NTC

Coaxial Hoses	Cut vapor line	TAG
	Repaired coaxial hose leaking vapor.	TAG
	Repaired coaxial hose not leaking vapor.	NTC
	Missing co-vent (MPD w/o retractor)	TAG
	Touching ground (except Hasstech)	NTC
	Missing liquid removal system (check executive orders for configurations)	NTC
Retractor	Broken retractor or missing where required	TAG
	Out of adjustment	NTC
	Missing retractor (Hasstech)	In compliance
	MPD without co-vent (w/o retractor)	TAG
	NOTE: An MPD with a Dayco or Goodyear hose with a built-in co-vent (venturi) at the bottom of the loop is in compliance (w/o retractor).	

When tagging out nozzles on multiproduct and other computerized dispensers, get the totalizer reading from the attendant or cashier if it is not available at the dispenser. If that person does not know how to access the data from the computer, have them contact their supervisor so the responsible person can access the totalizer reading to be entered on the tag. This should be done before departing the premises.

When issuing a tag for a crimped or flattened vapor hose, verify that the vapor path is blocked. Observe a vehicle fueling if possible. If the nozzle continually shuts off, it is an indication the vapor path is blocked if no other defects are found with the nozzle.

When an NTC, Out of Order Tag, and/or NOV is issued in the absence of the gas station's owner or operator, use the following guidelines:

1. Issue the Notice to Correct, out of order tag, and/or NOV following regular APCD policy.
2. Have the attendant/cashier or person on duty sign the notice and give them the yellow copy.
3. Explain the violation and instruct them to notify the station's owner or operator.
4. (APCD only) Complete the Gas Station Enforcement Action Notification letter, ENF-46 (see Exhibit 2). Attach a photocopy of the Notice to Correct and/or NOV. Also photocopy any "Out of Order" tags issued and attach them with the letter.
5. Mail the ENF-46 with attachments via certified mail. The green signature card is the documentation the letter was received.

**GASOLINE VAPOR RECOVERY  
INSPECTION FORM**

FID No: \_\_\_\_\_  
PERMIT TYPE: \_\_\_\_\_  
ATC# \_\_\_\_\_  
PTO# \_\_\_\_\_

DATE: \_\_\_\_\_  
TIME IN: \_\_\_\_\_  
TIME OUT: \_\_\_\_\_  
SUP. OK: \_\_\_\_\_

STATION NAME: \_\_\_\_\_

LOCATION: \_\_\_\_\_ PHONE: ( ) \_\_\_\_\_

MAILING: \_\_\_\_\_ ZIP: \_\_\_\_\_

CONTACT: \_\_\_\_\_ TITLE: \_\_\_\_\_

ACCESS GRANTED: Yes ( ) No ( ) BY WHOM/TITLE: \_\_\_\_\_

DATE OF LAST INSPECTION: \_\_\_\_\_ INSPECTOR: \_\_\_\_\_

INSPECTION TYPE: Routine \_\_\_ SCDP \_\_\_ Reinsp \_\_\_ Other \_\_\_\_\_

IN COMPLIANCE? Yes ( ) No ( ) NOV# \_\_\_\_\_ Rule(s) violated: \_\_\_\_\_

Equipment found as described in permit? Yes ( ) No ( ) If no, describe in comments section.

Engineering Division, See comments: Yes ( ) No ( )

Rule 201

Facility ATC or PTO is onsite and valid: Yes ( ) No ( ) If no, explain \_\_\_\_\_

Permit Conditions:

Hose configuration compliant? Yes ( ) No ( ) If no, explain \_\_\_\_\_

Fuel Throughput:

Throughput records on site? Yes ( ) No ( )

Throughput records reviewed? Yes ( ) No ( ) The maximum monthly throughput is \_\_\_\_\_ for month of \_\_\_\_\_

Gasoline (gals/mth) limit: \_\_\_\_\_ Compliant? Yes ( ) No ( )

Diesel (gals/mth) limit: \_\_\_\_\_ Compliant? Yes ( ) No ( )

Annual Report - Year: \_\_\_\_\_

Date received \_\_\_\_\_ Reviewed by \_\_\_\_\_ and

found to be complete? Yes ( ) No ( ) If no, explain \_\_\_\_\_

PHASE I EQUIPMENT CHECKLIST

CARB certified system: Yes ( ) or No ( )

Type: Coaxial ( ) or Two Point ( )

Item	Tank No. 1	Tank No. 2	Tank No. 3	Tank No. 4
Capacity				
Product				
Tank Depth				
Fill Pipe Length				
Fill Pipe Bottom Gap				
Fill Pipe Cap Gasket/Latch				
Fill Pipe Adapter-Secure				
*Vapor Recovery Cap Gasket/Latch				
*Vapor Recovery Adapter-Secure				
*Dry Break Gasket Intact SpringOperable				

\* Two point systems only

In Compliance? Yes ( ) or No ( ) If no, explain \_\_\_\_\_

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Vent pipes greater than 12 feet: Yes ( ) No ( )

Vent pipes manifolded: Yes ( ) No ( )

Describe deficiencies in above boxes: \_\_\_\_\_

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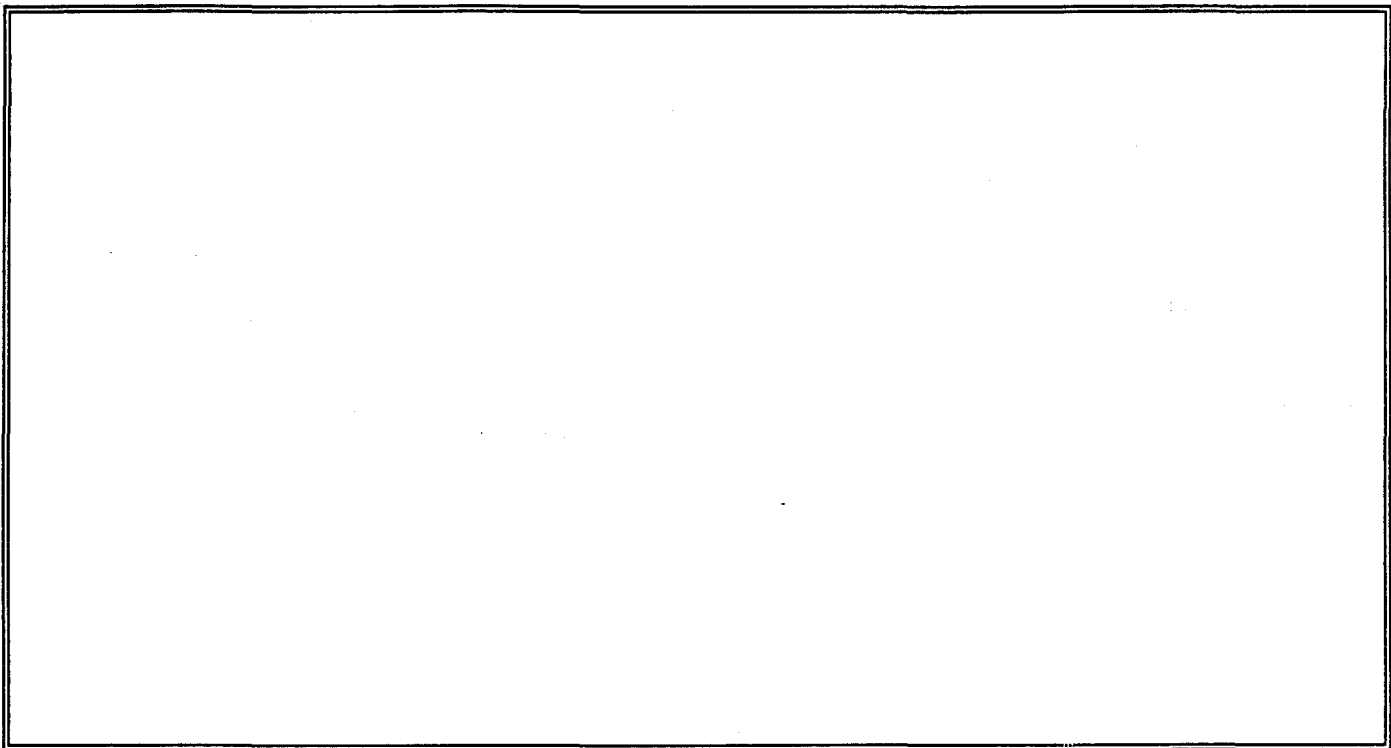


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FACILITY PLAN



COMMENTS

Multiple horizontal lines for writing comments.

