

State Water Resources Control Board

AUG 26 2014

Mr. Charles Liebal
OPW Fueling Containment Systems
3250 Highway 70 Business West
Smithfield, NC 27577

Dear Mr. Liebal:

EVALUATION FOR OPW FUELING CONTAINMENT SYSTEMS ENHANCED VAPOR RECOVERY PHASE I SYSTEM

As you know, Assembly Bill 2955 (statutes 2004, chapter 649) added section 25290.1.2(a) to chapter 6.7 of the Health and Safety Code. This section requires the Air Resources Board (ARB) and the State Water Resources Control Board (State Water Board) to certify, to the best of their knowledge and using existing resources, that equipment meeting the ARB's Enhanced Vapor Recovery (EVR) requirements also meets underground storage tank (UST) statutory requirements.

This determination letter combines and supersedes all previous determination letters for the OPW Fueling Containment Systems EVR Phase I System and includes the engineering statements from the determination letters issued September 6, 2013, April 16, 2013, April 16, 2013, January 5, 2009, April 10, 2007, and August 31, 2005.

On February 14, 2012 and June 13, 2014 we received an information packet from OPW Fueling Containment Systems requesting a review of various components of the OPW Fueling Containment Systems EVR Phase I System. The component(s) for which you seek our review includes the addition of (1) OPW 1-2200 Series Spill Containment and (2) a factory/field installed drain plug on the fill side of the OPW Series 1 Spill Containment. The proposed modifications were reviewed by a California Registered Professional Engineer, as indicated in the enclosed statements. Based on these signed statements and the information you provided, we have found no evidence that the proposed components conflict with chapter 6.7 of the Health and Safety Code.

State Water Board staff has reviewed the entire OPW Fueling Containment Systems EVR Phase I System and although the OPW Fueling Containment Systems EVR Phase I System does not conflict with Health and Safety Code chapter 6.7 and implementing regulations, the following regulatory limitations apply:

Spill Containment

OPW Series 1 Spill Containment

- 1-2100 Series Spill Containment
- 1-2200 Series Spill Containment
- 1-3100 Series Spill Containment
- 1-3700 Series Spill Containment

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OPW / Pomeco 500 Series

The following limitations apply to Spill Containment:

1. The direct burial configuration of spill containment does not provide secondary containment for the tank fill riser. Secondary containment of the tank fill riser is required on all UST systems installed on or after July 1, 2003 and on certain other UST systems pursuant to chapter 6.7 of the Health and Safety Code and implementing regulations. Accordingly, the direct burial configuration can only be used on UST systems where secondary containment of the fill riser is not required.
2. As required by California Code of Regulations, title 23, section 2635(b)(1)(C), spill containers shall either have a drain valve which allows drainage of the collected spill into the primary container or provide a means to keep the spill container empty. For spill containment that do not have a drain valve, the UST facility owner/operator is required:
 - i. To have a means to keep the spill container empty.
 - ii. The process, procedures, and equipment (aka the means) to empty the container shall be identified as required by California Code of Regulations, title 23, section 2632(d).
 - iii. Spill buckets should be kept clean and free of liquid (water and fuel) and debris.
 - iv. Liquid from the container must be stored and or disposed of in accordance with hazardous waste laws and regulations. More information regarding hazardous waste determination can be found in California Code of Regulations, title 22, section 66262.11.

Overfill Prevention Device

- OPW 61SO Series (Flapper Valve)
- OPW 71SO Series (Flapper Valve)
- OPW 53 VML (Ball Float Valve)
- OPW 30 MV (Ball Float Valve)

The following limitations apply to overfill prevention:

1. As required by California Code of Regulations, title 23, section 2635(b)(2), the overfill prevention device shall have no manual override and shall meet one of the following options:
 - i. Overfill device activates at 90 percent; restricts the flow to the tank or triggers and audible and visual alarm.
 - ii. Overfill device activates at 95 percent; provides positive shutoff of the flow to the tank.
 - iii. Overfill device activates at 95 percent; restricts the flow to the tank and activates an audible alarm five minutes before overfill.
 - iv. Overfill device activates before fittings are exposed to product and provides positive shutoff of the flow to the tank.
2. When using a combination of ball float valves and flapper valves, the flapper valve should be set below the level of the ball float valves. If the ball float valve is installed below the flapper valve, it may interfere with the normal operation of the flapper valve.

Remote Fill Jack Screw Kits

OPW 61JSK-4RMT

OPW 61JSK Alternate Remote Fill

The following limitations apply to all remote fill configurations:

1. Owners or their agents are required to ensure that the space available in the tank is greater than the volume of product to be transferred to the tank prior to each delivery, therefore USTs must include a tank top access port or other method that allows product level gauging prior to delivery.¹
2. Remote fill piping must be double-walled when connected to any one of the following:
 - i. A UST system installed on or after July 1, 2003.²
 - ii. A UST system where the overfill prevention valve activates at a level greater than 95 percent.³
 - iii. A UST system where secondary containment of tank fill riser piping is otherwise required by state law or local ordinance.⁴
3. When remote fill piping is required to be double-walled, the requirement applies to ALL remote fill piping components including horizontal-to-vertical transitions and the short vertical piping sections at the tank top and remote fill

¹ California Code of Regulations, title 23, section 2712(k)

² Health and Safety Code, chapter 6.7, sections 25290.1 and 25290.2

³ California Code of Regulations, title 23, section 2636(a)(1)

⁴ Health and Safety Code, chapter 6.7, section 25299.2

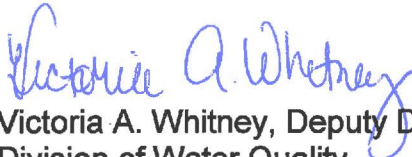
locations. To achieve this, single walled piping components at the tank top and remote fill locations must be contained in sumps.

4. A demonstration and verification that the overfill method operates properly may be required by the Unified Program Agency.

Pursuant to Health and Safety Code, chapter 6.7, section 25290.1.2(a), the State Water Board certifies that, to the best of its knowledge, the OPW Fueling Containment Systems EVR Phase I System, which includes the components listed on the enclosed system equipment list, meets the requirements of chapter 6.7 of the Health and Safety Code. This determination assumes the OPW Fueling Containment Systems EVR Phase I System is installed in accordance with the manufacturer's instructions and as required by chapter 6.7 of the Health and Safety Code and title 23 of the California Code of Regulations.

If you have questions regarding this letter, please contact Mr. Cory Hootman at (916) 341-5668 or by email at cory.hootman@waterboards.ca.gov.

Sincerely,



Victoria A. Whitney, Deputy Director
Division of Water Quality

Enclosures (11):

- 1) OPW Fueling Containment Systems EVR Phase I System Equipment List (6/27/2014)
- 2) OPW 1-2100 Series Spill Containment Engineering Statement (8/3/2005)
- 3) OPW 500 Series Spill Containment Engineering Statement (8/3/2005)
- 4) OPW 1-3100 Series Spill Containment Engineering Statement (12/30/2008)
- 5) OPW 1-3700 Series Spill Containment Engineering Statement (3/1/2013)
- 6) OPW 1-2200 Series Spill Containment Engineering Statement (3/21/2014)
- 7) OPW Drain Valve Replacement Plug for Series 1 Spill Containment Engineering Statement (3/31/2014)
- 8) OPW 53VML Overfill Prevention Ball Float Engineering Statement (8/3/2005)
- 9) OPW 71SO Series Overfill Prevention Valve Engineering Statement (3/1/2013)
- 10) OPW 61JSK-4RMT Remote Fill Jack Screw Kit Engineering Statement (10/4/2006)
- 11) OPW 61-JSK-4410 Alternate Remote Fill Jack Screw Kit Engineering Statement (4/17/2013)