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## State Water Resources Control Board

January 21, 2025

Mr. Jose Rodriguez  
Director of Technical Sales  
EMCO Wheaton Retail Corp  
1004 West Covina Parkway, #413  
West Covina, California 91790

Dear Mr. Rodriguez:

### **MODIFICATIONS AND ADDITIONS TO EMCO WHEATON'S ENHANCED VAPOR RECOVERY SYSTEM**

Section 25290.1.2(a) of the Health and Safety Code (H&SC) requires the California Air Resources Board (CARB) and State Water Resources Control Board (State Water Board) to certify, to the best of their knowledge and using existing resources, that equipment meeting the CARB's Enhanced Vapor Recovery (EVR) requirements also meets underground storage tank (UST) requirements located in H&SC, division 20, chapter 6.7, section 25280 et seq (H&SC Chapter 6.7) and California Code of Regulations, title 23, division 3, chapter 16 (UST Regulations).

On November 8, 2024, the State Water Board received the enclosed documentation detailing modifications and additions to EMCO Wheaton's (EMCO's) Phase I EVR system. EMCO's 493734SXL, -SXL, -SXXL, and -SXXLA collar kits were lengthened to improve the ability for UST personnel to perform repairs in the field. The swivel fill and swivel vapor adapter sizes were reduced from their original design sizes. The pull lever arm and chain assembly on the existing pull style drain valve was modified for a push style drain valve as an alternate design. The existing riser seal dimensions were reduced. The existing spill container lid and plow ring were modified to include alternative product materials. The A1100EVR-X version of EMCO's approved overflow prevention valve and A0020EVR-X version of EMCO's approved drop tube were modified from their original design to be modular for field assembly. The changes to these components will not affect the performance of the EVR equipment and do not conflict with H&SC Chapter 6.7 or the UST Regulations.

EMCO added an optional riser extension and tank fill debris collector to their suite of EVR components. These components are not required components of the EVR system and do not conflict with H&SC Chapter 6.7 or the UST Regulations.

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E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

EMCO added a 0585 ATG probe cap and a bar style extractor cap for top or remote fill applications. Both caps are aluminum and provide vapor tight seals in the application for which they are used. The 05865 ATG probe cap is based off a similar, approved design, however, the dimensions on the proposed cap are smaller. These new components do not conflict with H&SC Chapter 6.7 or the UST Regulations.

Based on the information provided, the State Water Board has found no evidence that the components listed above conflict with the requirements in H&SC Chapter 6.7 or the UST Regulations. This assumes the components are installed in accordance with applicable CARB Executive Orders and manufacturer's instructions as required by UST Regulations. Therefore, the State Water Board certifies, to the best of its knowledge, that the aforementioned EVR equipment meets the requirements of H&SC Chapter 6.7 and the UST Regulations. If you have additional questions regarding this matter, please contact Mr. Austion Lemire-Beaten at [Austin.Lemire-Baeten@waterboards.ca.gov](mailto:Austin.Lemire-Baeten@waterboards.ca.gov) or (916) 327-5612.

Sincerely,



Phillip Crader, Deputy Director  
Division of Water Quality

cc:

Annalisa Kihara, Assistant Deputy Director  
Division of Water Quality  
State Water Resources Control Board  
[Annalisa.Kihara@waterboards.ca.gov](mailto:Annalisa.Kihara@waterboards.ca.gov)

Tom Henderson  
UST Leak Prevention and  
Office of Tank Tester Licensing Manager  
State Water Resources Control Board  
[Tom.Henderson@waterboards.ca.gov](mailto:Tom.Henderson@waterboards.ca.gov)

George Lew, Chief  
Engineering and Certification Branch  
Air Resources Board  
[George.Lew@arb.ca.gov](mailto:George.Lew@arb.ca.gov)

Julie M. Osborn, Attorney IV  
Office of Chief Counsel  
State Water Resources Control Board  
[Julie.Osborn@waterboards.ca.gov](mailto:Julie.Osborn@waterboards.ca.gov)

Austin Lemire-Baeten  
Water Resources Control Engineer  
State Water Resources Control Board  
[Austin.Lemire-Baeten@waterboards.ca.gov](mailto:Austin.Lemire-Baeten@waterboards.ca.gov)

Enclosed:

- (1) EMCO Request for SWRCB Approval*
- (2) EMCO Approval Chart for EMCO Phase I Vapor Recovery System Components*
- (3) EMCO Approval Application Submittal Part 1*
- (4) EMCO Approval Application Submittal Part 2*
- (5) BL Pacific Petroleum Engineering Statement*