



Alan C. Lloyd, Ph.D.  
Agency Secretary

# State Water Resources Control Board

## Executive Office

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Arnold Schwarzenegger  
Governor

SEP 14 2005

Mr. Toby Argandona  
CNI Manufacturing  
15627 Arrow Hwy.  
Irwindale, CA 91706

Dear Mr. Argandona:

### EVALUATION OF CNI MANUFACTURING STAND ALONE DIRECT BURY SPILL CONTAINMENT MODELS 205 AND 214, PHASE I ENHANCED VAPOR RECOVERY 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 (H&SC). This section requires the Air Resources Board (ARB) 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 ARB's Enhanced Vapor Recovery (EVR) requirements also meets UST statutory requirements.

On July 15, 2005, we received on your behalf the enclosed signed statement by a California Registered Professional Engineer. Based on this statement and the information that CNI Manufacturing provided to us, we have found no evidence that the CNI Manufacturing Stand Alone Direct Bury Spill Containment Models 205 and 214 Phase I EVR System conflicts with H&SC Chapter 6.7. However, the Stand Alone Direct Bury Spill Containment Models 205 and 214 do not meet the secondary containment requirements of H&SC Chapter 6.7 and implementing regulations. Therefore, the Stand Alone Direct Bury Spill Containment Models 205 and 214 can only be used for applications where secondary containment of the fill riser is not required.

This determination assumes the CNI Manufacturing Stand Alone Direct Bury Spill Containment Models 205 and 214 Phase I EVR System is installed in accordance with applicable ARB Executive Orders and in accordance with manufacturer's instructions, as required by State Water Board regulations. Therefore, pursuant to H&SC section 25290.1.2(a), the State Water Board certifies that, to the best of its knowledge, the CNI Manufacturing Stand Alone Direct Bury Spill Containment Models 205 and 214 Phase I EVR System meets the requirements of H&SC Chapter 6.7.

*California Environmental Protection Agency*

Mr. Toby Argandona

- 2 -

SEP 14 2005

If you have questions regarding this letter, please contact Raed Mahdi at (916) 341-5871, or via email at [rmahdi@waterboards.ca.gov](mailto:rmahdi@waterboards.ca.gov).

Sincerely,



Celeste Cantu  
Executive Director

Enclosure: CNI Manufacturing Stand Alone Direct Bury Spill Containment Models 205 and 214 Phase I EVR System

cc: Ms. Catherine Witherspoon  
Executive Officer  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Mr. Don Johnson  
Assistant Secretary  
Cal/EPA  
1001 I Street  
Sacramento, CA 95814

June 27, 2005

Appendix

**Certification Statement for the CNI Manufacturing Stand Alone Spill Containment Models 205 and 214<sup>1</sup>**

Based on a careful review and analysis, I hereby certify that the CNI Manufacturing Stand Alone Spill Containment Models 205 and 214, which is under consideration for California Air Resources Board (ARB) certification, meets the requirements of Chapter 6.7 of the California Health and Safety Code (the State Water Resources Control Board's underground storage tank requirements, including enhanced leak detection and continuous vacuum, pressure, or hydrostatic monitoring.)<sup>2</sup>

The CNI Manufacturing Stand Alone Spill Containment Models 205 and 214 warranties are valid as long as the system is installed, operated and maintained according to manufacturer's instructions and in a manner that does not exceed the limitations (e.g., tank capacity, fueling points, throughputs, etc.) described below.

Limitations:

Refer to Permeability, Compatibility and Warranty Report dated June 16, 2005, Section 3.

Bernie M. Lingrau 6-27-05  
Signed by Date  
(California Professional Engineer)

Toby Argandona 6-27-05  
Signed by Date  
(Company Representative)

Bernie M. Lingrau (# C 050985)  
Printed Name (California Professional Engineer)

Toby Argandona  
Printed Name (Company Representative)

Pacific Petroleum Equipment  
Professional Engineer Company Name

CNI Manufacturing  
Equipment Manufacturer Name

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<sup>1</sup> This certification statement is part of the guidelines developed by the California Air Resources Board (ARB) and State Water Resources Control Board (State Water Board) to implement provisions of Assembly Bill 2955 (Statutes 2004, Chapter 649: McCarthy).

<sup>2</sup> This certification is based on the presumption that the <Name of EVR System> is constructed, installed, maintained, and operated in accordance with all applicable requirements of Chapter 6.7 of California Health and Safety Code and Chapter 16 of the California Code of Regulations.