State Water Resources Control Board

MAY 10 2016

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

Dear Mr. Liebal:

THE ADDITION OF THE FIBRELITE MULTIPORT CONFIGURATION AND REVISION OF THE EQUIPMENT LIST FOR THE OPW FUELING CONTAINMNET SYSTEMS ENHANCED VAPOR RECOVERY PHASE I SYSTEM

Health and Safety Code (Health & Saf. Code), chapter 6.7, section 25290.1.2 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.

On November 16, 2015, the State Water Board received an information packet from OPW Fueling Containment Systems requesting a review of various modifications to OPW Fueling Containment Systems' EVR phase I system. The information packet included: 1) a description of the proposed modifications; 2) an equipment list of the EVR phase I system; 3) signed statements from California registered professional engineers indicating that the modifications to the system meet the requirements of Health & Saf. Code, chapter 6.7; and 4) a summary of the items reviewed by the California registered professional engineers in support of their signed statements.

The modification for which OPW Fueling Containment Systems seeks the State Water Board's review includes the addition of the Fibrelite multiport configuration and revision of the EVR phase I equipment list. Based on the signed engineering statements and other information provided by OPW Fueling Containment Systems, State Water Board staff has concluded that the proposed modifications do not conflict with chapter 6.7 of the Health & Saf. Code.

This determination letter supersedes the previously issued determination letter for OPW Fueling Containment Systems' EVR phase I system issued August 26, 2014. Enclosed are the California register professional engineering statements supplied by OPW Fueling Containment Systems associated with this phase I EVR system.

Although the EVR phase I systems does not conflict with chapter 6.7 of the Health & Saf. Code and title 23 of the California Code of Regulation (Cal. Code of Regs.), 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

Pomeco Series Spill Containment
- P500 Series Spill Containment
- P700 Series Spill Containment

1. Direct burial configuration can only be used on systems where secondary containment of the fill riser is not required. The direct burial configuration of spill containment does not provide secondary containment for the UST fill riser. Secondary containment of the UST fill riser is required on all UST systems installed on or after July 1, 2003 and on UST systems installed before July 1, 2003 that do meet the overfill requirements cited in Cal. Code of Regs., title 23, sections 2636(a)(1). (Health & Saf. Code, ch. 6.7, § 25290.2(j).)

2. As required by Cal. Code of Regs., title 23, section 2635(b)(1)(C), spill containers must meet all the following:
   i. Have a minimum capacity of five gallons;
   ii. Kept clean and free of liquid (water and fuel) and debris;
   iii. Either,
      (a) Have a drain valve which allows drainage of the collected spill into the primary container; or
      (b) Provide a means to keep the spill container empty;
   iv. For spill containment that does not have a drain valve, the UST facility owner/operator is required to specify the means (process, procedures, and equipment) to keep the spill container empty in the Monitoring Plan required by Cal. Code of Regs., title 23, section 2632(d); and
   v. 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 Cal. Code of Regs., 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)

1. As required by Cal. Code of Regs., title 23, section 2635(b)(2), the overfill prevention device must have no manual override and meet one of the following requirements:
   i. Alert the transfer operator when the UST is 90 percent of capacity by restricting the flow into the UST or triggering an audible and visual alarm;
   ii. Restrict the flow to the UST at least 30 minutes before the UST overfills, provided that the restriction occurs when the UST is no more than 95 percent of capacity; and activates an audible alarm at least five minutes before the UST overfills;
   iii. Provide positive shut-off of the flow to the UST when the UST is filled to no more than 95 percent of capacity; or
   iv. Provide positive shut-off of the flow to the UST so that none of the fittings located on the top of the UST are exposed to product due to overfilling.

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 Series
OPW 71JSK Series

1. Owners or their agents are required to ensure that the space available in the UST is greater than the volume of product to be transferred to the UST prior to each delivery, therefore USTs must include a top access port or other method that allows product level gauging prior to delivery. (Cal. Code of Regs., tit. 23, § 2712(k).)

2. Remote fill piping must have secondary containment when connected to any one of the following:
   i. A UST system installed on or after July 1, 2003. (Health & Saf. Code, ch. 6.7, §§ 25290.1 and 25290.2.)
   ii. A UST system where the overfill prevention valve activates at a level greater than 95 percent. (Cal. Code of Regs., tit 23, § 2636(a)(1).)
   iii. A UST system where secondary containment of UST fill riser piping is otherwise required by state law or local ordinance. (Health & Saf. Code, ch. 6.7, § 25299.2.)

3. When remote fill piping is required to have secondary containment, the requirement applies to all remote fill piping components including horizontal-to-vertical transitions and the short vertical piping sections at the UST top and remote fill locations. To achieve this, single-walled piping components at the UST 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.

UST Bottom Protector
OPW/Pomeco 6111-1400

1. As required by Cal. Code of Regs., title 23, section 2631(c), below each accessible opening of a UST, the primary containment must have one of the following:
   i. A wear plate (striker plate) installed, center to center, meeting all of the following requirements:
      (a) The plate must be made of steel or if steel is not compatible with the hazardous substance stored another compatible material;
      (b) The width of each plate must be at least eight inches on each side, or must be equal to the area of the accessible opening or guide tube, whichever is larger;
      (c) The thickness of each steel plate must be at least 1/8 inch and each plate made of another material must be of sufficient thickness to provide equivalent protection;
      (d) If the plate is under 1/4 inch thick, it must be rolled to the contours of the UST; and
      (e) The plate must be bonded or tack welded in place; or
   ii. A drop tube-mounted bottom protector.

Pursuant to Health & Saf. 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 & Saf. Code. This determination assumes the OPW Fueling Containment Systems EVR phase I system is installed, operated, and maintained in accordance with the manufacturer's instructions, chapter 6.7 of the Health & Saf. Code, and title 23 of the Cal. Code of Regs.

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,

Karen Larsen, 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)

(Enclosures continue on next page)

(Enclosures continued)

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)

cc: [Via email only]

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