

State Water Resources Control Board

September 6, 2013

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

Dear Mr. Liebal:

EVALUATION OF STAGE I VAPOR RECOVERY COMPONENTS, OPW 61JSK ALTERNATIVE REMOTE FILL CONFIGURATION

Assembly Bill 2955 (Statutes 2004, Chapter 649) added Health and Safety Code, Chapter 6.7, section 25290.1.2(a) requiring 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 ARB's Enhanced Vapor Recovery (EVR) requirements also meets underground storage tank (UST) statutory requirements.

The State Water Board has received an information packet from OPW Fueling Containment Systems detailing a proposed modification to ARB Executive Order VR-102. This proposed modification is the addition of the OPW 61JSK alternate remote fill. Your letter states this new addition is similar to the currently approved OPW 61JSK-4RMT alternative remote fill (EVR determination dated April 10, 2007) with the exception of a two-inch remote fill instead of a four-inch remote fill. The OPW 61JSK alternate remote fill has been reviewed by a California Registered Professional Engineer, as indicated in the enclosed signed statement dated April 17, 2013. Based on this signed statement and the supporting information you provided, the State Water Board has found no evidence that the OPW 61JSK alternate remote fill conflicts with Health and Safety Code, Chapter 6.7.

The following limitations apply to the OPW 61JSK alternate remote fill configuration:

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,¹ therefore USTs must include a tank top access port or other method that allows product level gauging prior to delivery.

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

2. Remote fill piping must be double-walled when connected to any one of the following:
 - A UST system installed on or after July 1, 2003.²
 - A UST system where the overflow prevention valve activates at a level greater than 95 percent.³
 - 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 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 overflow method operates properly may be required by the Unified Program Agency.

This determination assumes the OPW Phase I EVR System is installed and maintained in accordance with the most recent ARB Executive Order VR-102 and manufacturer's instructions. 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 inclusion of the OPW 61JSK alternate remote fill to the OPW Phase I EVR System as outlined in the April 10, 2007 letter meets the requirements of Health and Safety Code, Chapter 6.7.

This determination letter supersedes the determination letter issued for the inclusion of the OPW 61JSK alternate remote fill to the OPW Phase I EVR System dated July 24, 2013.

If you have questions regarding this letter, please contact Ms. Laura Fisher at (916) 341-5870, or by e-mail at laura.fisher@waterboards.ca.gov.

Sincerely,



Victoria A. Whitney, Deputy Director
Division of Water Quality

If/km

ECM # 1087785; 1069722

Enclosures (8): Request to Add Stage I Vapor Recovery Components, OPW 61JSK Alternate Remote Fill

Third Party Review and Approval of OPW 61JSK Alternate Remote Fill

OPW 61JSK Alternate Remote Fill Product List

² California Health and Safety Code, section 25290.1 and 25290.2.

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

⁴ California Health and Safety Code, section 25299.2.

OPW 61JSK Alternate Remote Fill Catalog Page

OPW 61JSK Alternate Remote Fill Representative Component Drawing

State Water Board EVR Determination for Remote Fill Configuration dated
April 10, 2007

Third Party Review for Remote Fill Configuration dated October 4, 2006

State Water Board Costco Letter to Install Proprietary Fuel Additive
Ultrazol 9888 to Certified Agencies dated February 2, 2012



February 25, 2013

Laura Fisher
State Water Resources Control Board
Division of Water Quality
Underground Storage Tank Program
PO Box 100
Sacramento, California 95812-0100

Subject: Request for Stage I Vapor Recovery Components,
OPW 61JSK Alternate Remote Fill Configuration for UST Equipment

Dear Laura,

OPW is currently working with ARB on getting an alternate 61JSK remote fill configuration for UST equipment approved and added to OPW executive order VR-102. The OPW 61JSK-4410 jack screw kit used with this alternate remote fill configuration is the same jack screw kit currently approved in VR-102 for direct fill configurations. The jack screw is used in a similar manner as the currently approved 61JSK-4RMT reviewed by SWRCB in a letter dated April 10, 2007 with the exception of a 2" remote fill line instead of 4" remote line. The 61JSK series for remote fill has been evaluated previously and the determination letter dated April 10, 2007 and third party review are attached. The alternate remote fill configuration is used with the Costco additive program which has already been reviewed by the SWRCB and a copy of the letter dated February 2, 2012 is attached.

Besides the two letters mentioned also attached to this letter is a product list, catalog page, comparison of remote fill configurations, and product drawing.

If you have no concerns regarding these modifications please send us a determination letter that we can send to ARB.

If you have any questions, please contact me at (919) 934 2786 ext. 206. If there is any benefit to reviewing this application in person I will be in the Sacramento area next week on March 5 and 6.

Best Regards,

Charles Liebal
OPW Fueling Containment Systems
Product Manager
Phone: (919) 934-2786 x206
Email: cliebal@opwfcs.com

OPW Fueling Containment Systems

Mission Statement

3250 Highway 70 Business West
Smithfield NC, USA 27577
919-934-2786

Revolutionizing fueling operations globally by
optimizing safety, efficiency, reliability, and
environmental sustainability through innovative
fuel handling and information management solutions

Aaron M. Newman P.E.
3095 Skillman Ln.
Petaluma, CA 94952
707-479-4594
anewmanpe@comcast.net

April 17, 2013

OPW Fueling Components
9393 Princeton-Glendale Rd.
Hamilton, Ohio 45240
800-422-2525

Attn: Kris Kane

RE: Third Party Review and Approval of OPW Alternate Remote Fill 61JSK Jack Screw Kit for addition to OPW Phase 1, Executive Order VR-102-L

I have examined and reviewed the following items on the OPW Alternate Remote Fill 61JSK Jack Screw Kit and the associated equipment that extend the vapor envelope of the underground storage tank.

1. Equipment
 - a. OPW 61JSK-4RMT Jack Screw Kit
 - b. Morrison Bros., Company, Fig 530 Series, Nipple Check Valve, Catalogue Sheet
 - c. ASCO, 2/2 Series 8210, Pilot Operated, Gas Shutoff Solenoid Valve, with Viton Seals, Catalogue Sheet
2. OPW Compatibility Tests
 - a. Report # 5147 – Soak testing of OPW 61JSK-4410 alternate remote fill configuration with additive Date: November 2, 2011
3. System Drawings
 - a. OPW provided client drawing of remote fill installation for additive inclusion to during fuel drops.
 - b. Veeder-Root provided drawing of the Positive Shutdown Wiring Diagram.
4. Evaluations
 - a. Evaluation Of Remote Fill Configuration And Other Additions to OPW Phase I, EVR System (VR 102-G), Dated April 10, 2007
 - b. Eight Sample Pressure Decay Tests that demonstrate that remote fill as it is proposed is vapor tight.

Aaron M. Newman P.E.
3095 Skillman Ln.
Petaluma, CA 94952
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anewmanpe@comcast.net

- c. Letter from Laura Fisher (SWRCB) To CUPAs and participating agencies, Dated February 2, 2012, indicating that Clean Power Additive has been determined not to effect FFS and Veeder-Root components and has been added to LG – 113 Letters
 - d. Letter from Ken Wilcox Associates, Inc, to Laura Fisher, SWRCB, dated March 6n 2013, regarding the compatibility of the Clean Power Additive with the Veeder-Root PLLD equipment.
5. Installation and Maintenance Instructions
- a. OPW 61JSK-4410 Alternate Remote Fill Configuration
 - b. Letter from Bob Luby, Veeder-Root Red Jacket Support, explaining Power Integrity System Back-Up for Positive shutdown utilizing the TLS350 Output relays, for the additive system.
6. General Information
- a. Clean Power Additive Material Safety Data Sheet (Proprietary)

Based on a careful review and analysis the information provided by OPW, I hereby certify that the OPW Alternate Remote Fill 61JSK Jack Screw Kit along with the check and solenoid valves will provide containment of liquid and vapors in accordance with California Health and Safety Code, Chapter 6.7, Paragraph 25290.1. Design and Construction Requirements for Underground Storage Tanks Installed on or After July 1, 2004. In addition to the above parts, the integrity of the entire underground system (including the additive tank and its associated equipment) must be verified by continuously monitoring of the interstitial space. Product Line Leak Detection shall be provided as part of the additive system in accordance with California Health and Safety Code, Chapter 6.7, Paragraph 25290.1.h. Overfill prevention shutdown of the additive pump shall be provided in accordance with California Health and Safety Code, Chapter 6.7, Paragraph 25290.1.f



Aaron M. Newman P.E.
Mechanical Engineer
California Engineers License #M026214



ENHANCED VAPOR RECOVERY MULTI AGENCY REVIEW PROCESS
GUIDELINES FOR DETERMINATION OF COMPLIANCE OF ENHANCED VAPOR
RECOVERY SYSTEMS WITH UNDERGROUND STORAGE TANK STATUTES

May 24, 2005

Background:

Health and Safety Code (HSC), chapter 6.7, section 25290.1.2(a) requires the Air Resources Board (ARB) and State Water Resources Control Board (State Water Board) to determine collaboratively, to the best of their knowledge and using existing resources, that the equipment that meets the ARB's Enhanced Vapor Recovery (EVR) requirements also meets underground storage tank (UST) statutory requirements. Assembly Bill 2955 (Statutes 2004, Chapter 649) added this provision. To implement this new requirement, ARB and State Water Board staff are proposing the following guidelines. ARB and State Water Board staff will continue their regular meetings to discuss any overlapping issues and coordinate to the extent practical to minimize any new deadline conflicts between the two agencies' requirements.

Guidelines For New EVR Systems And Modifications To Existing EVR Systems:

1. For new EVR system applications and EVR modification requests, the ARB will copy the State Water Board on the first correspondence with the equipment manufacturer regarding this topic. The State Water Board review process will begin once it is notified that the equipment manufacturer responds to the ARB's letter.

The ARB will notify the EVR system equipment manufacturer, in writing, that the manufacturer is required to submit specific information to the State Water Board. Specific information that the equipment manufacturer must provide to the State Water Board, UST Program Manager includes:

- A. A description of the proposed EVR system or proposed modification to an existing EVR system.
- B. An equipment list of the proposed EVR system or proposed modification to an existing EVR system.
- C. Independent testing organization (e.g., UL) and third-party testing results.
- D. A statement signed by a California registered professional engineer, that the proposed EVR system meets the requirements of chapter 6.7, HSC. (A sample statement is included in Appendix I of the guidelines.)
- E. A summary of the items reviewed by the California registered professional engineer in support of the statement referenced in D.

During the review period, State Water Board may seek clarification of the information submitted from the EVR system equipment manufacturer.

State Water Board staff will advise local agencies and other interested parties via email that the EVR system is under review so that they may comment.

2. After State Water Board staff review the information outlined above in guideline #1, the State Water Board will notify the applicant and the ARB of its determination. The State Water Board determination will be made no later than the end of the California Air Pollution Control Officer Association (CAPCOA) Executive Order (E.O.) comment period or a date mutually agreed upon by ARB and State Water Board staff.
3. The ARB will issue an E.O. after determining that the proposed EVR system meets the requirements of section 94011, of title 17, CCR and after receiving all required determination letters (e.g., from the Office of the State Fire Marshal, State Water Board, Division of Measurement Standards, and Division of Occupational Safety and Health).
4. The E.O.s and specific information (including the State Water Board determination) will be posted on the ARB and the State Water Board websites.

Certification Statement for the OPW Alternate Remote Fill 61JSK Jack Screw Kit for addition to OPW Phase 1, Executive Order VR-102-L¹

Based on a careful review and analysis, I hereby certify that the **OPW Alternate Remote Fill 61JSK Jack Screw Kit, Morrison Bros., Company, Fig 530 Series, Nipple Check Valve and ASCO, 2/2 Series 8210, Pilot Operated, Gas Shutoff Solenoid Valve with Viton seals** which are under consideration for California Air Resources Board (ARB) certification, meet 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.)²

The **OPW Alternate Remote Fill 61JSK Jack Screw Kit** warranty is 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 design limitations.

Other Requirements: The remote fill is added to the tank system to allow for additive to be introduced into the fuel in the underground storage tanks. The additive UST, piping and pump system shall be constructed in accordance with Chapter 6.7 of California Health and Safety Code and Chapter 16 of California Code of Regulations. These requirements shall include but not be limited to continuous monitoring of primary and secondary containments, pressurized line leak detection and overfill protection.

Aaron M. Newman P.E. 4/17/13
Signed by _____ Date _____
(California Professional Engineer)

Kris Kane 4-17-13
Signed by _____ Date _____
(Company Representative)

Aaron M. Newman P.E.
Printed Name (California Professional Engineer)

Kris Kane
Printed Name (Company Representative)

Aaron M. Newman P.E.
Professional Engineer Company Name

OPW
Equipment Manufacturer Name

3095 Skillman Ln.
Mailing Address

9393 Princeton - Glendale Rd.
Mailing Address

Petaluma, CA 94952
City, State, Zip Code



Hamilton, OH, 45011
City, State, Zip Code

707-479-4594
Phone Number

513-870-3162
Phone Number

anewmanpe@comcast.net 4/17/13
Email

kkane@opwfcs.com
Email

¹This 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).

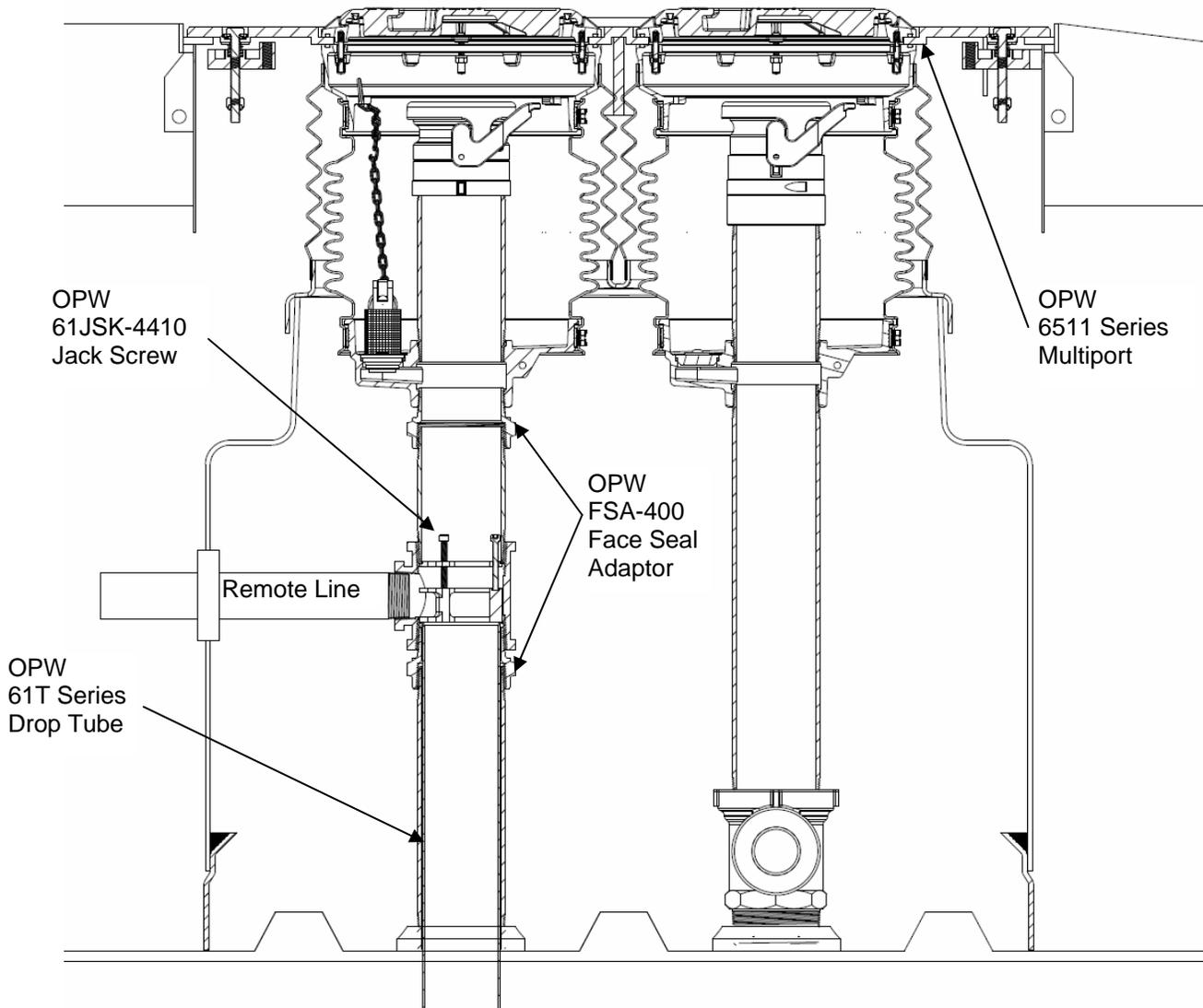
²This certification is based on the presumption that the **OPW Alternate Remote Fill 61JSK Jack Screw Kit; Morrison Bros., Company, Fig 530 Series, Nipple Check Valve; and ASCO, 2/2 Series 8210, Pilot Operated, Gas Shutoff Solenoid Valve, with Viton seals** are constructed, installed, maintained, and operated in accordance with all applicable requirements of Chapter 6.7 of California Health and Safety Code and Chapter 16 of California Code of Regulations.

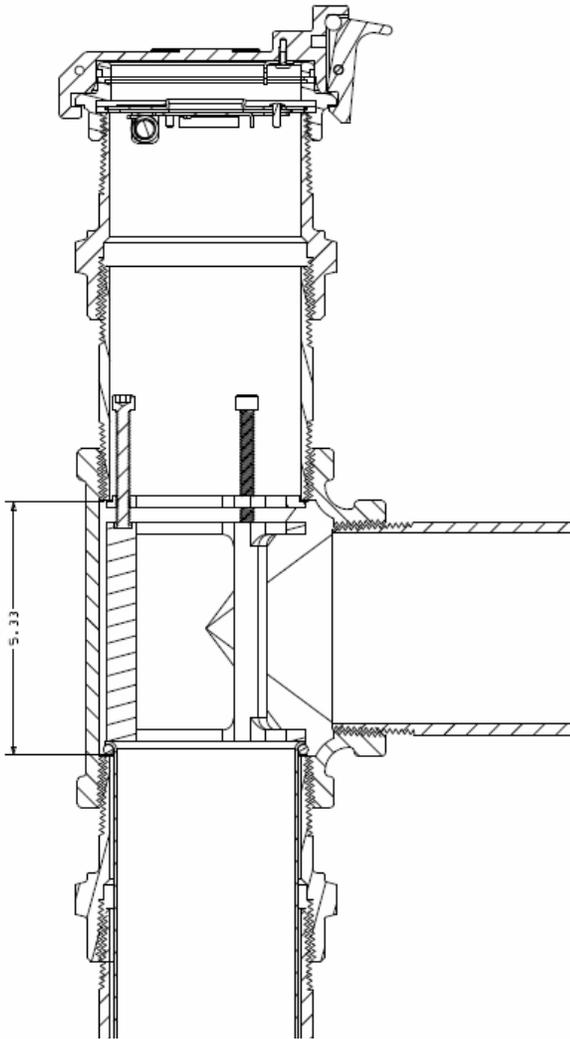
Product List

OPW Jack Screw Kit

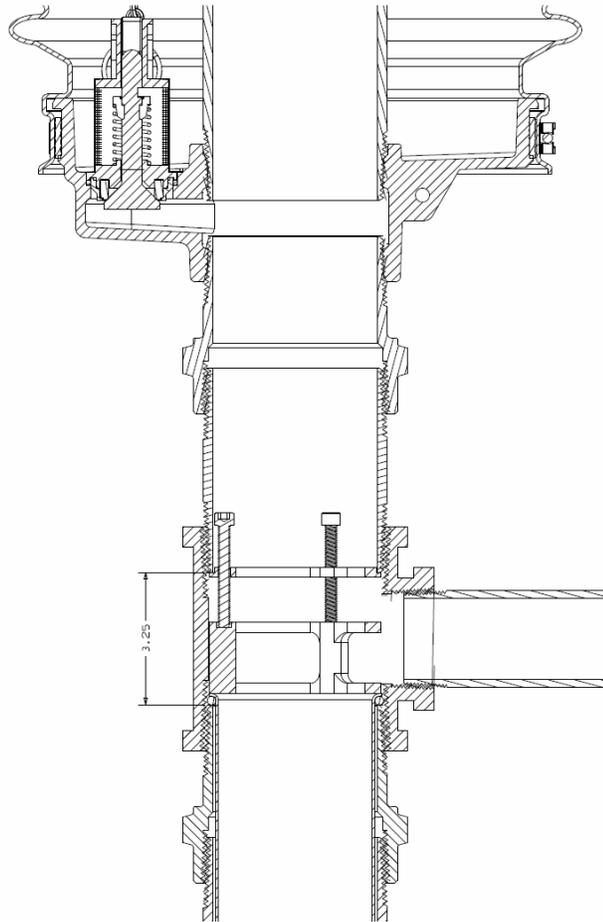
61JSK-4410 Jack Screw Kit (can be used with alternate remote fill configuration)

A drawing of the proposed alternate remote fill configuration is shown below:





Typical Remote Fill Configuration,
61JSK-4RMT, 4" tee, already approved



Alternate Remote Fill Configuration,
61JSK-4410, 4" x 4" x 2" tee

Catalog Page

OPW 71SO OVERFILL PREVENTION VALVE

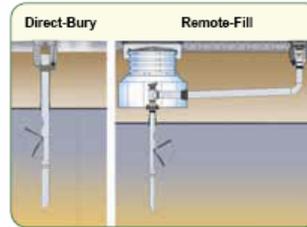
Raising The Standard In Overfill Prevention

From the company that brought you the industry standard OPW 61SO, OPW raises the standard with the introduction of the **New 71SO Overfill Prevention Valve** – breakthrough innovation that takes overfill prevention to a whole new level of overfill perfection.

- Eliminates curing issues due to hot or cold temperatures
- Easier, quicker, installation
- Higher quality, more reliable installation
- Lower costs
- Greater protection against fugitive emissions and pressure decay
- Fastest flow rate in the industry

The new 71SO is a two-stage, positive shut-off valve, providing completely automatic operation with no pre-checks to perform, no resets, and no overrides to be broken or abused. The valve closes when the tank level rises to 95% capacity and provides a special bypass valve so the tank can be filled to a maximum capacity of 98%. The 71SO is available for direct-bury and remote applications.

No Epoxy Sealants Required!



71SO Ordering Specifications

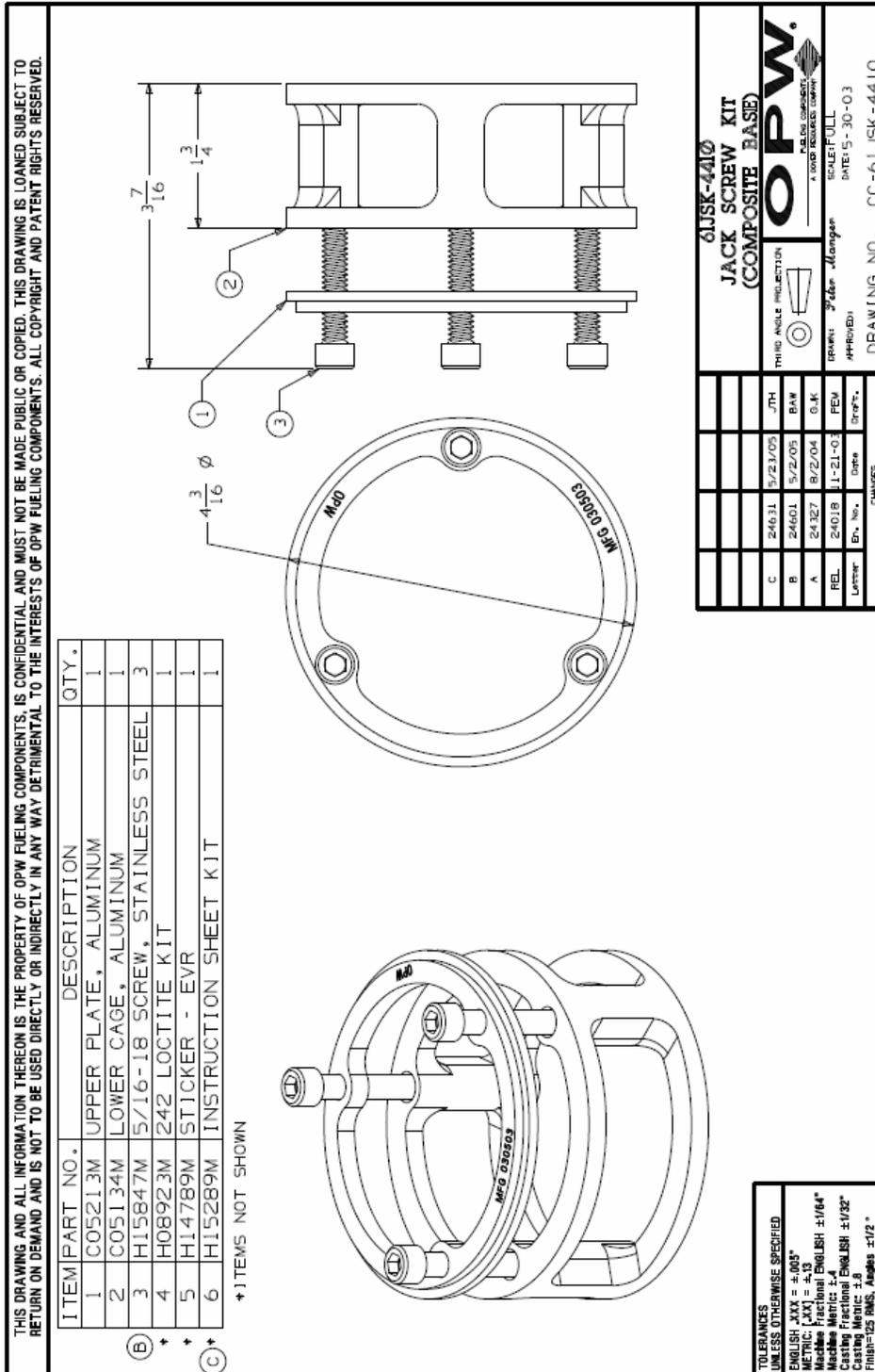
Product No.	Description	A- Upper Tube Length		B- Lower Tube Length		C- Overall Length		Max. Riser Length		Max. Nominal Tank Dia.		Max. Actual Tank Dia.		Weight	
		in.	m	in.	m	in.	m	in.	m	in.	m	in.	m	lbs.	kg
71SO-400C	Vapor-Tight Overfill Valve, 5 Ft. Bury, 8 Foot Tank	60	1.5	83	2.1	155-3/4	3.9	53-1/2	1.4	96	2.4	107	2.7	16	7
71SO-410C	Vapor-Tight Overfill Valve, 10 Ft. Bury, 10 Foot Tank	120	3.1	102	2.6	234-3/4	5.9	113-1/2	2.9	120	3.1	126	3.2	25	11
71SO-420C	Vapor-Tight Overfill Valve, 10 Ft. Bury, 12 Foot Tank	120	3.1	126	3.2	258-3/4	6.5	113-1/2	2.9	144	3.7	150	3.8	26	12
71SO-4000	Non Vapor-tight Overfill Valve, 5 ft. Bury, 8 ft. Tank	60	1.5	83	2.1	155-3/4	3.9	53-1/2	1.4	96	2.4	107	2.7	16	7
71SO-4010	Non Vapor-tight Overfill Valve, 10 ft. Bury, 10 ft. Tank	120	3.1	102	2.6	234-3/4	5.9	113-1/2	2.9	120	3.1	126	3.2	25	11
71SO-TOOLC	71SO Installation Tool													2.5	1
61JSK-4RMT	Jack Screw Kit For Vapor-Tight Remote Applications													1.5	0.7
61JSK-4410	Jack Screw Kit For Composite Base Spill Buckets													1	0.5
61JSK-44CB	Jack Screw Kit For Cast Iron Base Spill Buckets													1	0.5

Replacement Parts

Part No.	Description
61SOK-0001	Replacement Float Kit
H11931M	Drop Tube Seal
H14840M	Lower Tube Seal

61JSK-4410 AND 61JSK-44CB
Instruction Sheet Order Number:
H15289M

Representative Component Drawing (61JSK-4410)





Linda S. Adams
Secretary for
Environmental Protection

State Water Resources Control Board

Executive Office

Tam M. Doduc, Board Chair
1001 I Street • Sacramento, California 95814 • (916) 341-5615
Mailing Address: P.O. Box 100 • Sacramento, California • 95812-0100
Fax (916) 341-5621 • <http://www.waterboards.ca.gov>



Arnold Schwarzenegger
Governor

April 10, 2007

Mr. Mike Bartush
OPW Fueling Components, Inc.
P.O. Box 405003
Cincinnati, OH 45240

Dear Mr. Bartush

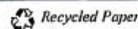
EVALUATION OF REMOTE FILL CONFIGURATION AND OTHER ADDITIONS TO OPW PHASE I EVR SYSTEM (VR 102-G)

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 underground storage tank (UST) statutory requirements.

On October 18, 2006 we received an information packet from you detailing two proposed modifications to the current OPW Phase I EVR System. The first proposed modification would allow the use of the OPW 71SO Overfill Prevention Valve and new models of caps and swivel adaptors. The second proposed modification includes the OPW 61JSK-4RMT Jack Screw Kit, which would allow for filling of the UST from a remote location. The proposed modifications were reviewed by a California Registered Professional Engineer, as indicated in the enclosed signed statement. Based on this signed statement and the information that you provided, we have found no evidence that the OPW Phase I EVR System conflicts with H&SC Chapter 6.7.

Although the OPW Phase I EVR System does not conflict with H&SC Chapter 6.7, we have noted that the direct burial configuration of this system does not provide secondary containment for the tank fill riser. Secondary containment of the tank fill riser is required on all UST systems installed 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.**

California Environmental Protection Agency



OPW Fueling Containment Systems

3250 Highway 70 Business West
Smithfield NC, USA 27577
919-934-2786

Mission Statement

Revolutionizing fueling operations globally by
optimizing safety, efficiency, reliability, and
environmental sustainability through innovative
fuel handling and information management solutions



Mr. Mike Bartush, OPW

- 2 -

April 10, 2077

The following additional limitations apply to the remote fill configuration of the OPW Phase I EVR System:

- 1 All remote fill installations must include a tank top access port or other method that allows product level gauging prior to delivery. 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 delivery¹. Therefore, the gauging method (tank top access, electronic gauge, etc.) should be configured to allow easy access by tank operators and delivery drivers.
- 2 The tank top access port must be labeled to indicate that it cannot be used to fill the tank.
3. Remote fill piping must be double-walled when connected to any of the following:
 - A UST system installed on or after July 1, 2003²,
 - A UST system where the overfill prevention valve activates at a level greater than 95%³,
 - A UST system where secondary containment of tank fill riser piping is otherwise required by state law or local ordinance⁴.
4. 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 locations. To achieve this, single-walled piping components at the tank top and remote fill locations must be contained in sumps.

Pursuant to H&SC section 25290.1.2(a) the State Water Board certifies that, to the best of its knowledge, the OPW Phase I EVR System (available in direct bury, secondarily contained, and remote fill configurations) meets the requirements of H&SC Chapter 6.7. This determination assumes the OPW Phase I EVR System is installed in accordance with applicable ARB Executive Orders, manufacturer's instructions, and the limitations outlined in this letter.

¹ California Code of Regulations, Title 23, section 2712(k)
² California Health and Safety Code, section 25290.1 and 25290.2
³ California Code of Regulations, Title 23, section 2636(a)(1)
⁴ California Health and Safety Code, section 25299.2

California Environmental Protection Agency





Mr. Mike Bartush, OPW

- 3 -

April 10, 2077

If you have questions regarding this letter, please contact Ms. Laura Chaddock at (916) 341-5871, or by email at lochaddock@waterboards.ca.gov.

Sincerely,

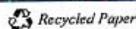
Dorothy Rice
Executive Director

Enclosure: Certification Statement for modifications to the OPW Phase EVR System

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

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

California Environmental Protection Agency



OPW Fueling Containment Systems

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919-934-2786

Mission Statement

Revolutionizing fueling operations globally by
optimizing safety, efficiency, reliability, and
environmental sustainability through innovative
fuel handling and information management solutions

James H. Ray
CIVIL ENGINEER
2041 Hidden Valley Drive
Santa Rosa, CA 995404
707-480-8115

October 4, 2006

OPW Fueling Components, Inc.
P.O. Box 405003
Cincinnati, OH 45240-5003

**RE: CERTIFICATION BY STATE REGISTERED PROFESSIONAL ENGINEER
CCR Title 23, Division 3 and Chapter 16 Health and Safety Code Chapter 6.7
OPW REMOTE FILL PHASE I EVR SYSTEM
Modification to EO VR-102-E to include remote**

Based on a careful review and analysis, I hereby certify that the OPW Phase I Vapor recovery System (EO VR-102-E), with one additional modification to the items now pending by application to CARB, will function as a remote fill vapor return, which is now under consideration by CARB will meet the California Air Resources Board (ARB) certification, meets the requirements of Chapter 6.7 of the Health and Safety Code.

I reviewed the following materials:

1. CARB Executive Order VR-102-E
2. OPW Drawings DC-61SALP-1020-EVR, DC-61VSA-1020-EVR, DC-634LPC-0400, ED00673ZA, DC-1711LPC-0300, B00651ZA, DC-62M-0375, BC-71SO-41OC and comparison drawing of Current CARB 61SO and New CARB 71SO
3. OPW Catalogue material on 71SO Overfill Prevention Valve.
4. OPW Installation and Maintenance Instructions for OPW 71SO-EVR VAPOR TIGHT OVERFILL PREVENTION VALVES.
5. Letter March 1, 2006 M. Bartush (OPW) to G. Lew (CARB) listing basis for enhancements and specific materials used.
6. Letter September 25, 2006 listing the specific improvement of the existing products.
7. OPW 61JSK-4RMT Jack Screw Kit (Cap, adapter, trap door, jack screw).
This is the additional item for the remote configuration.
8. 3 OPW drawings of remote installation and parts.
9. 1 drawing of site to be used for CARB testing.

James H. Ray
James H. Ray
Civil Engineer
C24518





Appendix

Certification Statement for the OPW REMOTE PHASE I EVR System¹

Based on a careful review and analysis, I hereby certify that the modifications to OPW PHASE I EVR Remote Fill Configuration 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).²

The OPW PHASE I EVR Remote Fill Configuration warranty is 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:

Approval for Phase I EVR Remote Fill Configuration.

James H Ray 10-4-06
Signed by Date
(California Professional Engineer)

Mike Bartush 10-13-06
Signed by Date
(Company Representative)

James H. Ray
Printed Name

Mike Bartush
Printed Name

(Individual)
Professional Engineer Company Name

OPW Fueling Components
Equipment Manufacture Name

2041 Hidden Valley Drive
Mailing Address

P.O. Box 405003732
Mailing Address

Santa Rosa, CA 95404
City, State, Zip Code

Cincinnati, OH 45240-5003
City, State, Zip Code

707 480-8115
Phone Number

513 870 3164
Phone Number

jhray@sbcglobal.net
Email



jmesbit@opw-fc.com
Email

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

²This certification is based on the presumption that the OPW PHASE I 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 California Code of Regulations.



State Water Resources Control Board

February 2, 2012

To: Certified Unified Program Agencies and Participating Agencies

COSTCO WHOLESALE STATEWIDE PROJECT TO INSTALL UST FOR THE STORAGE OF PROPRIETARY FUEL ADDITIVE ULTRAZOL 9888

Costco Wholesale (Costco) is seeking to obtain permits from various Certified Unified Program Agencies and Participating Agencies (CUPAs) to install a 1,500-gallon underground storage tank (UST) at approximately 80 of their existing gasoline fueling facilities. To assist with expediting the permitting process with the CUPAs, Costco has requested that State Water Resources Control Board (State Water Board) staff review the proposed tank, piping, and leak detection equipment for compliance Title 23, California Code of Regulations (UST Regulations), sections 2631 and 2643 as it relates to the storage of Ultrazol 9888 (Ultrazol).

Title 23, CCR Section 2631

State Water Board staff reviewed various technical documents, independent testing reports, affirmative statements of compatibility, and Material Safety Data Sheets for Ultrazol. From these sources, it is our understanding that Ultrazol consists of the same constituents that are already used in gasoline, and that the constituent make up of Ultrazol is similar to materials used in the evaluations of tanks and piping. The independent testing organization approvals for the proposed components are not specific to this fuel additive and concentration, therefore the requirements of section 2631 of the existing UST Regulations are not fully satisfied.

As you are aware, the State Water Board has proposed amendments to section 2631 of the UST Regulations that will allow the use of a manufacturer affirmative statement of material compatibility under certain circumstances. The affirmative statements of compatibility provided by the manufacturers on behalf of Costco, in conjunction with the independent testing organization approval for petroleum products, appears to meet the requirements of the proposed regulation. Manufacturer statements of material compatibility reviewed include: Containment Solutions UST (Novolac Vinyl Ester Resin System), Ameron International piping (Dualoy 3000/L), and Flexing flex-connector (Fireflex).

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We are not aware of any regulatory requirements which would prohibit constructing the USTs as proposed so long as all applicable requirements in the UST Regulations are satisfied at the time the CUPA issues an operating permit. Therefore, CUPA's may choose to proceed with permitting construction with the understanding that operating permits cannot be issued until the UST has satisfied all requirements of the regulations.

Title 23, CCR Section 2643

Franklin Fueling and Veeder-Root have provided appropriate testing reports by a third party showing equipment functionality with Ultrazol. Therefore Local Guidance (LG) Letter 113 has been updated to reflect compliance with the use of Ultrazol for the following equipment: Franklin Fueling STP-MLD-D automatic line leak detector, Veeder-Root sensor 794380-323, Veeder-Root sensor 794380-208 and Veeder-Root sensor 857080.

This review should not be interpreted as an endorsement of materials or components. Nor should this review be interpreted as an approval for construction. Costco must comply with all local notification, local permitting requirements and is responsible for obtaining approvals from the CUPAs prior to construction and operation.

If you have any questions, please me at (916) 341-5870 or lfisher@waterboards.ca.gov.

Sincerely,

Laura S. Fisher, Chief
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