CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

03/27/2014
Mr. Jose Rodriquez
EMCO Wheaton Retail
1004 West Covina Parkway #413
West Covina, CA 91790

Dear Mr. Rodriquez:

EVALUATION OF EQUIPMENT FOR EMCO WHEATON RETAIL ENHANCED VAPOR RECOVERY PHASE I SYSTEM

As you know, Assembly Bill 2955 (Statutes 2004, chapter 649) added section 25290.1(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.

On December 10, 2013 we received an information packet from you requesting a review of various components to the State Water Board's EVR Phase I System determination issued November 17, 2010. The component for which you seek our review includes the addition of a factory installed drain plug on the fill side of the EMCO Model A1004EVR Spill Containment Series. The proposed modifications were reviewed by a California Registered Professional Engineer, as indicated in the enclosed statement. Based on this signed statement 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.

Although the EMCO Wheaton Retail EVR Phase I System does not conflict with chapter 6.7 of the Health and Safety Code and implementing regulations, the following regulatory limitations apply to the EMCO Model A1004EVR Spill Containment Series:

1. As required by the 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 EMCO Model A1004EVR Spill Containment Series that do not have a drain valve, the UST facility owner/operator is required to comply with all of the following:
    - To have a means to keep the spill container empty.
    - The process, procedures, and equipment (aka the means) to empty the container shall be identified in the monitoring plan required by the California Code of Regulations section 2632(d).
    - Spill buckets should be kept clean and free of liquid (water and fuel) and debris.

- 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.

2. 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 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.

Pursuant to chapter 6.7 of the Health and Safety Code section 25290.1(a) the State Water Board certifies that, to the best of its knowledge, the EMCO Wheaton Retail EVR Phase I System which includes the above listed components meets the requirements of chapter 6.7 of the Health and Safety Code. This determination assumes the EMCO Wheaton Retail EVR Phase I System is installed in accordance with the manufacturer's instructions, as required by State Water Board Regulations.

This determination letter supersedes the determination letter for the "Evaluation of Additional Equipment for EMCO Wheaton's Retail EVR Phase I System issued November 17, 2010.

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 or
Mr. Cory Hootman at (916) 341-5668 or by e-mail at cory.hootman@waterboards.ca.gov.

Sincerely,

FOR

Victoria A. Whitney, Deputy Director
Division of Water Quality

Enclosures (5): 1) Engineering Statement for EMCO Wheaton Retail Phase I EVR System - 10/28/2010
2) EWRC Vapor Config.dwg – Revised 6/20/2013
3) EWRC Fill Config.dwg – Revised 6/20/2013
4) EWRC Multi Vapor Config.dwg – Revised 6/20/2013
5) EWRC Multi Fill Config.dwg – Revised 6/20/2013

Engineering Statement

Certification Statement for the
EMCO Wheaton Retail Phase I Enhanced Vapor Recovery (EVR) System. [1]

Based on a careful review and analysis, I hereby certify that the EMCO Wheaton Retail Phase I (EVR) System, 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 EMCO Wheaton Retail Phase I (EVR) System warranty is valid as long as the system is installed, operated and maintained according to the manufacturer's instructions and in a manner that does not exceed the limitations (e.g., tank capacity, fueling points, throughputs, etc.) described below.

Limitations: See the Attached Appendix

Gary W Hall — 10/29/2010
Signed by — Date
California Professional Engineer
M 30584

[illegible] — 11-1-2010
Signed by — Date
Company Representative

Gary W Hall
G.W. Hall Engineering
9556 Silverdale Loop Road NW #3
Silverdale, Washington, 98383
Phone: 360-692-4955
Email: [illegible]sdigy.net

REGISTERED PROFESSIONAL ENGINEER
GARY WAYNE HALL
30584
Term 30, 2012
MECHANICAL
STATE OF CALIFORNIA

Jose E. Rodriguez
EMCO Wheaton Retail Corp.
1004 West Covina Parkway #413
West Covina, California 91790
Phone: 619-646-9982
Email: JERodriguezSD@aol.com

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1 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 2886 (Statutes 2004, Chapter 649: McCarthy).

2 This certification is based on the presumption that the EMCO Wheaton Retail Balance Phase II (EVR) System with or without (ISD) 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 California Code of Regulations.

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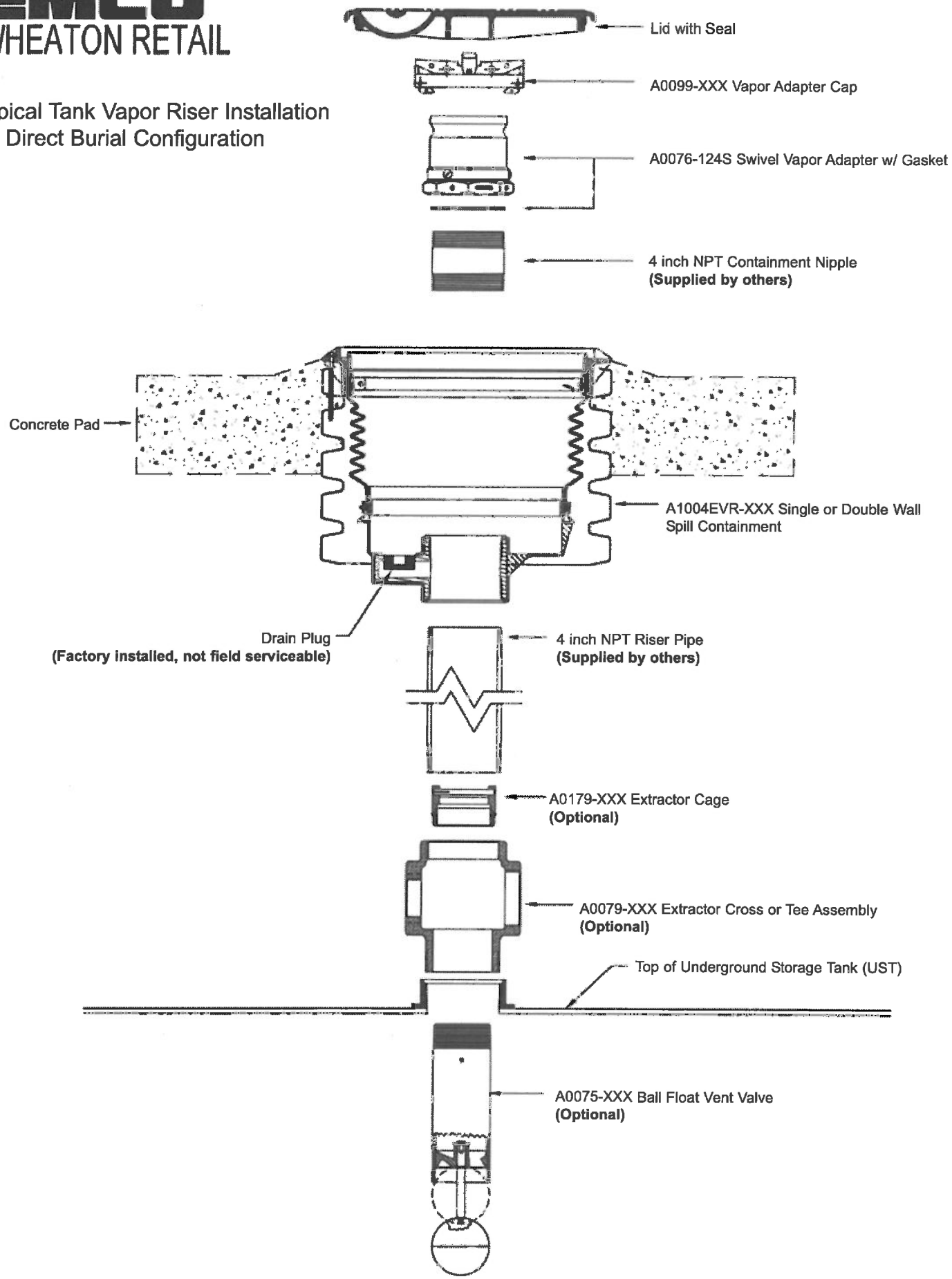
Typical Tank Vapor Riser Installation for Direct Burial Configuration



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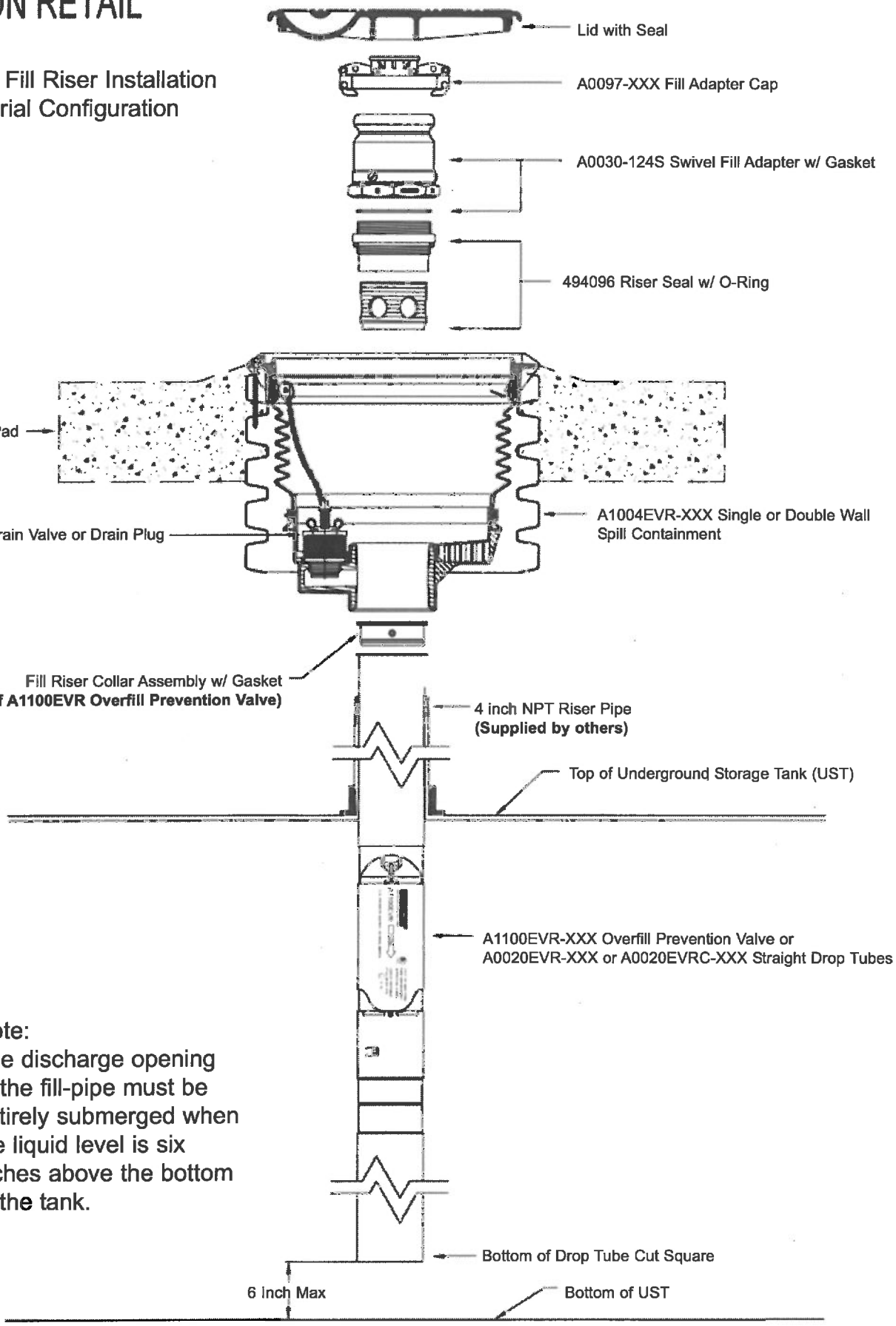
Typical Tank Fill Riser Installation for Direct Burial Configuration



Note:
The discharge opening of the fill-pipe must be entirely submerged when the liquid level is six inches above the bottom of the tank.

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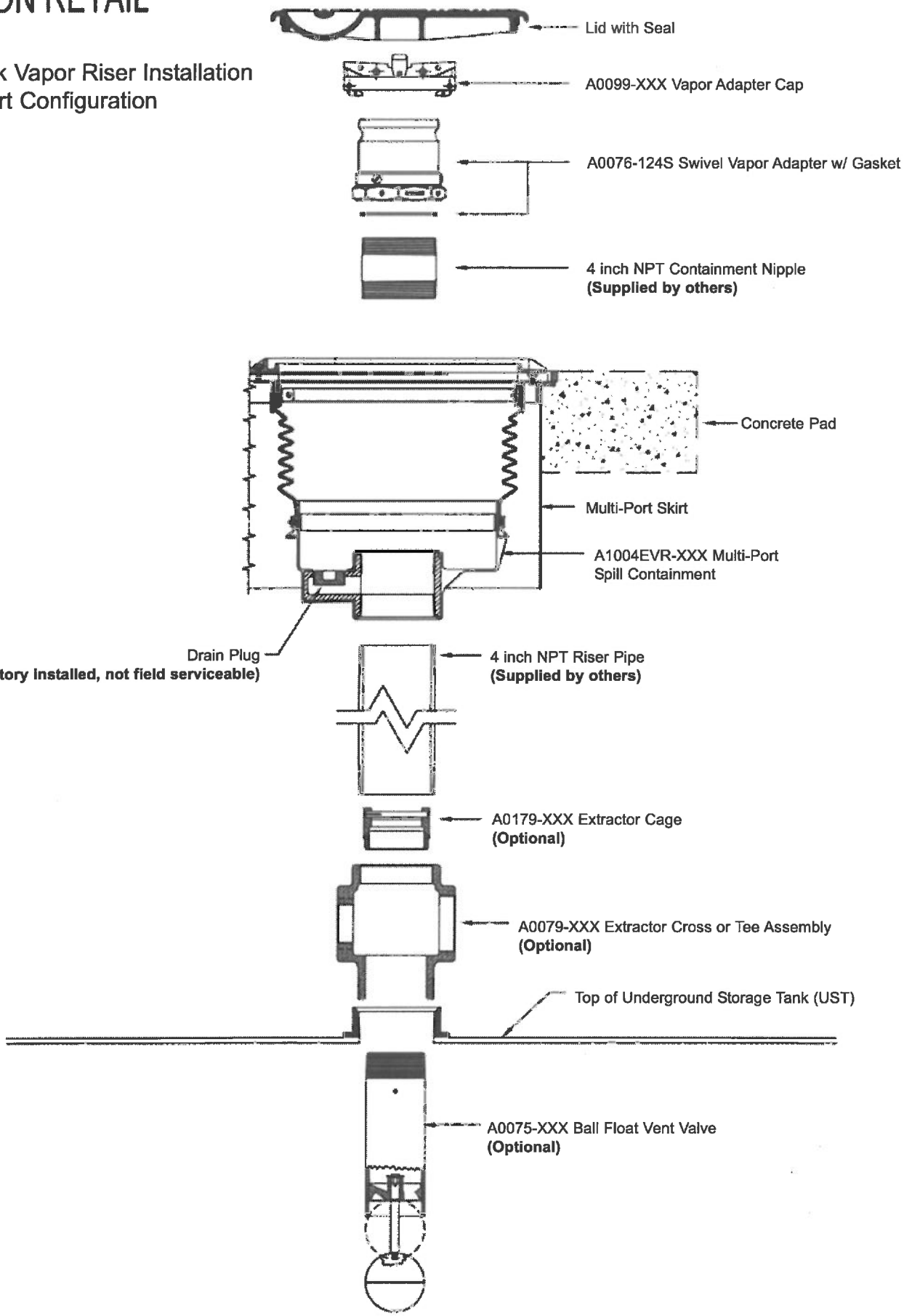
Typical Tank Vapor Riser Installation for Multi-Port Configuration



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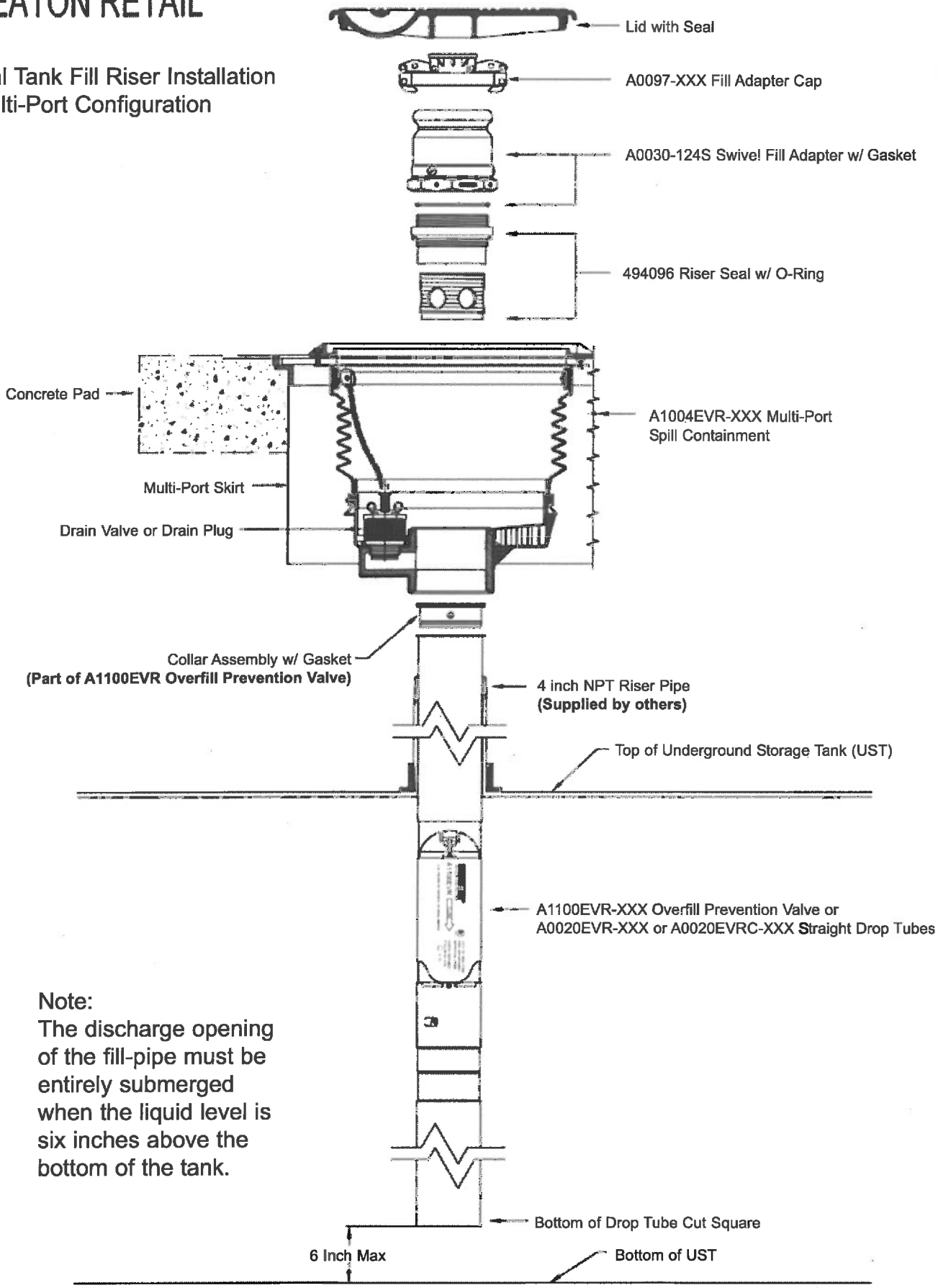
Typical Tank Fill Riser Installation for Multi-Port Configuration



Note:
The discharge opening of the fill-pipe must be entirely submerged when the liquid level is six inches above the bottom of the tank.