

State Water Resources Control Board

MAR 21 2016

Ms. Sandy Adams
Franklin Fueling Systems
3760 Marsh Road
Madison, WI 53718

Dear Ms. Adams:

THE COMBINING OF THE EBW AND PHIL-TITE PHASE I ENHANCED VAPOR RECOVERY SYSTEMS, ADDITION OF THE DEFENDER SERIES OVERFILL PREVENTION VALVE, AND CONSOLIDATION OF PREVIOUSLY ISSUED DETERMINATION LETTERS

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 July 22, 2015, the State Water Board received an information packet from Franklin Fueling Systems requesting a review of various modifications to the Phil-Tite and EBW EVR phase I systems. The information packet included: (1) a description of the proposed EVR system or proposed modification to an existing EVR system; (2) an equipment list of the proposed EVR system; (3) signed statements from California registered professional engineers indicating that the proposed EVR systems or proposed modification 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 modifications for which Franklin Fueling Systems seek the State Water Board's review include the addition of the Defender 708-59X-9YZ Series overfill prevention valve and the combining of the Phil-Tite and the EBW EVR phase I systems into one phase I EVR system. Based on the signed engineering statements and other information provided by Franklin Fueling Systems, State Water Board staff have concluded that the proposed modifications do not conflict with chapter 6.7 of the Health & Saf. Code.

In order to take account of all the limitations of the EVR systems, previously issued determination letters for the Phil-Tite and EBW EVR phase I systems have been combined into one determination letter. This determination letter include the limitations previously determined on June 30, 2005, November 13, 2006, January 28, 2008, June 26, 2008, and May 13, 2013. In addition, enclosed are all the submitted and signed California registered professional engineering statements from the previous determination letters for both the Phil-Tite and EBW EVR phase I systems.

Although the above referenced EVR phase I systems do not conflict with chapter 6.7 of the Health & Saf. Code and implementing regulations, the following regulatory limitations apply:

Spill Containment

Phil-Tite 85100 Series

Phil-Tite 8510X-1 Series

EBW Defender 705 Series

EBW 7XX-49Y-0Z Series

1. Direct burial configuration can only be used on UST 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 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 UST systems installed before July 1, 2003 that do not meet the overfill prevention requirements cited in California Code of Regulations (Cal. Code Regs.), title 23, sections 2636(a)(1). (Health & Saf. Code, ch. 6.7, § 25290.2(j).)
2. As required by Cal. Code Regs., title 23, section 2635(b)(1)(C), spill containers shall meet all the following:
 - i. Have a minimum capacity of 5 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 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 Regs., title 22, section 66262.11.)

Overfill Prevention

EBW 708-49X-1Y Series (Flapper Valve)

EBW 708-49X-3Y Series (Flapper Valve)

Defender 708-59X-9YZ Series (Flapper Valve)

1. As required by Cal. Code Regs., title 23, section 2635(b)(2), the overfill prevention device shall have no manual override and meet one of the following requirements:
 - i. Alert the transfer operator when the tank is 90 percent of capacity by restricting the flow into the tank or triggering an audible and visual alarm;
 - ii. Restrict the flow to the tank at least 30 minutes before the tank overfills, provided that the restriction occurs when the tank is no more than 95 percent of capacity; and activates an audible alarm at least 5 minutes before the tank overfills;
 - iii. Provide positive shut-off of the flow to the tank when the tank is filled to no more than 95 percent of capacity; or
 - iv. Provide positive shut-off of the flow to the tank so that none of the fittings located on the top of the tank 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.

Tank Bottom Protector

Phil-Tite TBP-3516-E

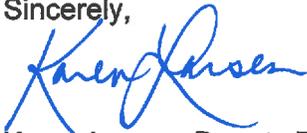
1. As required by Cal. Code Regs., title 23, section 2631(c), below each accessible opening of a tank, the primary containment shall have one of the following:
 - i. A wear plate (striker plate) installed, center to center, meeting all of the following requirements:
 - (a) The plate shall be made of steel or if steel is not compatible with the hazardous substance stored another compatible material;
 - (b) The width of each plate shall be at least eight inches on each side, or shall be equal to the area of the accessible opening or guide tube, whichever is larger;
 - (c) The thickness of each steel plate shall be at least 1/8 inch and each plate made of another material shall be of sufficient thickness to provide equivalent protection;
 - (d) If the plate is under 1/4 inch thick, it shall be rolled to the contours of the UST; and
 - (e) The plate shall 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, the State Water Board certifies that, to the best of its knowledge, the Franklin Fueling Systems EVR phase I System, which includes the components listed on the enclosed Phil-Tite/EBW EVR Phase I Vapor Recovery System Equipment List, meets the requirements of chapter 6.7 of the Health & Saf. Code. This

determination assumes the Phil-Tite and EBW phase I systems are 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 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 (8):

- 1) Franklin Fueling System's Phil-Tite/EBW EVR Phase I Vapor Recovery System Equipment List (1/28/2016)
- 2) Phil-Tite EVR Phase I Engineering Statement (6/27/2005)
- 3) Franklin Fueling Systems-Phil-Tite EVR Phase I Auto Limiter II and EBW Phase I Equipment Engineering Statement (7/12/2006)
- 4) Franklin Fueling Systems- Phil-Tite EVR Phase I Defender Series Spill Containment Engineering Statement (2/4/2013)
- 5) Franklin Fueling Systems-EBW EVR Phase I Defender Series Spill Containment Engineering Statement (2/8/2013)
- 6) Franklin Fueling Systems-Phil-Tite EVR Phase I Defender Series Overfill Prevention Valve Engineering Statement (7/13/2015)
- 7) Franklin Fueling Systems-EBW EVR Phase I Defender Series Overfill Prevention Valve Engineering Statement (7/13/2015)
- 8) Franklin Fueling Systems- Phil-Tite and EBW EVR Phase I Defender Series Spill Containment for E85 Engineering Statement (7/16/2015)

cc: Mr. Aaron M. Newman, P.E.
3095 Skillman Lane
Petaluma, CA 94952

cc: [Via email only]

Pat Bennett
Air Resources Supervisor
Monitoring and Laboratory Division
Air Resources Board
pat.bennett@arb.ca.gov

Julie M. Osborn
Attorney III
Office of Chief Counsel
State Water Resources Control Board
julie.osborn@waterboards.ca.gov

Franklin Fueling Systems' Phil-Tite/EBW Vapor Recovery Phase I System Equipment List

EquipmentManufacturer/Model Number**Spill Container
(Phil-Tite Series)**

Phil-Tite 85100-1 and 85100 Series (Gas/E85)
(Replacement only for existing installations except for E-85 installations)

8510X-1 and 85100 Series Legend:

X represented by:

0 = product spill container

0-EXT = product spill container w extension collar

1 = vapor spill container

1-EXT = vapor spill container w extension collar

**Spill Container
(Defender Series)**

EBW Defender 705 Series* (Gas/E85)

Defender 705 Series Legend*

7055XYZAB where XYZAB is represented by:

X = containment

4 = single wall

5 = double wall

Y = installation

2 = multiport bucket

5 = direct bury

Z = interstitial monitoring method

0 = no sensor/gauge (i.e. single wall)

1 = I2 monitor (float gauge, visual)

2 = TSP-ULS (electronic sensor)

A = spill container base thread**

0 = NPSM (straight thread)

1 = NPT (taper thread)

B = drain valve

1 = with drain valve (typical on product/fill side)

2 = without drain valve (typical on vapor side)

**Spill Container
(EBW Series)**

EBW 7XX49Y0Z

EBW Series Legend

XX = spill bucket size:

05 = 5 gallon

15 = 15 gallon

Y = level:

0 = grade level with cast iron base (5 gallon only)

2 = below grade level with cast iron base (5 & 15 gallon)

Z = drain valve:

1 = drain valve

2 = no drain valve

*May be installed in direct bury or multi-port configurations including single fill or double tank riser orientations.

**NPSM base thread spill containers (straight thread) are designed for use with the Phil-Tite M/F 4X4 Riser Adaptor at sites where the NPT threads of the tank riser are not cut flat or square. NPT base spill containers (taper thread) do not require use of Phil Tite M/F Riser Adaptor at sites where the NPT threads of the tank riser are flat and cut square.

<u>Equipment</u>	<u>Manufacturer/Model Number</u>
Spill Container Lid (Phil-Tite Series Spill Container)	Phil-Tite 85011 (Gas/E85)
Spill Container Lid (Defender and EBW Series Spill Container)	EBW 7054401X (Gas/E85) Where X = Lid Color 1 = Black 2 = White 3 = Red 5 = Yellow 7 = Orange Z = others colors on request
Replacement Drain Valve (Phil-Tite Series Spill Container)	Phil-Tite 85400 (Gas/E85)
Replacement Drain Valve (Defender Series Spill Container)	EBW 70533729 (Gas/E85)
Replacement Drain Valve (EBW Series Spill Container)	EBW 70533719 (Gas)
Drain Valve Blank Kit (EBW Series Spill Container)	EBW 90022
Drain Valve Blank Kit (Defender Series Spill Container)	EBW 9002201
Drain Valve Isolation Kit (EBW Series Spill Container)	EBW 70825501
Drain Valve Isolation Test Kit (EBW Series Spill Container)	EBW 90079
Product Adaptor	Phil-Tite SWF-100-B (Gas) Phil-Tite SWF-100-SS (Gas/E85)
Vapor Adaptor	Phil-Tite SWV-101-B (Gas) Phil-Tite SWV-101-SS (Gas/E85)
Riser Adaptor	Phil-Tite M/F 4X4* (Gas/E85) Phil-Tite M/F 4X4-R* (Gas/E85)
* Required for use with "Phil-Tite Series" spill containers and for "Defender Series" spill containers with NPSM (straight thread) base. Not used for "Defender Series" spill containers with tapered (NPT) thread base.	
Riser Support Bracket Drop Tube Riser Clamp (Defender Series Spill Containers)	Phil Tite M 1600 (Gas/E85) FFS 70550901EC (Gas/E85)

Equipment**Manufacturer/Model Number****Dust Cap**

Morrison Brothers 323C-0100ACEVR (vapor) (Gas/E85)
 Morrison Brothers 305C-0100ACEVR
 (product)(Gas/E85)

OPW 1711T-EVR (vapor) (Gas/E85)
 OPW 634TT-EVR (product) (Gas/E85)
 OPW 634LPC (product) (Gas)
 OPW 1711LPC (vapor) (Gas)

CompX CSP1-634LPC (product) (Gas)
 CompX CSP3-1711LPC (vapor) (Gas)
 CompX CSP2-634LPC (product) (Gas)
 CompX CSP4-1711LPC (vapor) (Gas)

EBW 77720102 (product) (Gas/E85)
 EBW 77720202 (product) (Gas/E85)
 XX indicates presence of security chain:
 01= no chain
 02= with chain

EBW 30420006 (vapor) (Gas/E85)
 EBW 304200XX (vapor) (Gas)
 EBW 304301XX (vapor) (Gas/E85)
 XX indicates presence of security chain:
 01= no chain
 02= with chain

EBW 30430103 (vapor) (Gas/E85)

Pressure/Vacuum Vent Valve

FFS PV-Zero 407215901 (Gas/E85)

Husky 5885 (Gas)

Tank Gauge Port Components

Veeder-Root 312020-952 (cap and adaptor kit) (Gas/E85)

Morrison Brothers 305XPA1100AKEVR (cap and
 adaptor kit) (Gas/E85)
 Morrison Brothers 305-0200AAEVR (replacement
 adaptor) (Gas/E85)
 Morrison Brothers 305XP-110ACEVR (replacement cap)
 (Gas/E85)

EBW 90037-E (In Tank Probe Cap and Adapter Kit)
 (Gas/E85)

Equipment

Manufacturer/Model Number

Overfill Prevention Device¹

Defender OPV series 70859X9YZ (Gas/E85)

Defender OPV series legend

X = upper drop tube length:

1 = 5 feet

2 = 10 feet

Y = Tube compatibility:

0 = Gas

2 = Gas/E85

Z = lower drop tube length:

1 = 8 feet

2 = 10 feet

EBW 70849X1Y (Gas)

EBW 70849X3Y (Gas/E85)

X represented by:

1 = 5 foot length upper drop tube section

2 = 10 foot length upper drop tube section

Y represented by:

1 = 8 foot length bottom thread on section drop tube

2 = 10 foot length bottom thread on section drop tube

Drop Tube¹

OPW 61-T (various lengths) (Gas)

EBW 7822041X-2 (X = various lengths) (Gas)

EBW 7822043X-2 (X = various lengths) (Gas/E85)

Riser Offset¹

Phil-Tite M-6050-X (x = various offsets) (Gas/E85)

Double Fill¹ Tank Riser Configuration

Phil Tite (configuration only) (Gas/E85)

Defender (configuration only) (Gas/E85)

Tank Bottom Protector¹

Phil-Tite TBP-3516-E (Gas/E85)

¹ If these components are installed or required by regulations of other agencies, only those components and model numbers specified above shall be installed or used.

Appendix

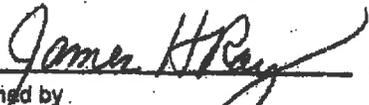
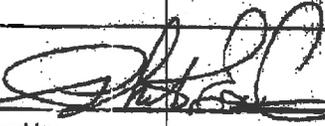
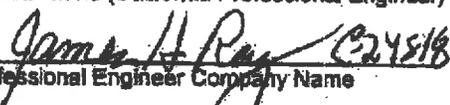
Certification Statement for the PHIL-TITE PHASE I EVR System¹

Based on a careful review and analysis, I hereby certify that the PHIL-TITE 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 PHIL-TITE PHASE I EVR System 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:

See the provisions in the attached PHIL-TITE PHASE I EVR Product Warranty

	<u>June 28, 2005</u>		<u>June 27, 2005</u>
Signed by (California Professional Engineer)	Date	Signed by (Company Representative)	Date
<u>James H. Ray</u> Printed Name (California Professional Engineer)		<u>Phillip E. Smith</u> Printed Name (Company Representative)	
 <u>624518</u> Professional Engineer Company Name		<u>PHIL-TITE</u> Equipment Manufacturer Name	
<u>2041 Hidden Valley Drive</u> Mailing Address		<u>3732 Electro Way</u> Mailing Address	
<u>Santa Rosa, CA 95404</u> City, State, Zip Code		<u>Redding, CA 96002</u> City, State, Zip Code	
<u>707 480 8115</u> Phone Number		<u>530 223 7400</u> Phone Number	
<u>jhray@sbcglobal.net</u> Email		<u>phil-tite@msr.com or stanb@phil-tite.com</u> Email	



6-27-05

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 2955 (Statutes 2004, Chapter 649: McCarthy).

² This certification is based on the presumption that the PHIL-TITE 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 of California Code of Regulations.

**James H. Ray for
CIVIL ENGINEER
2041 Hidden Valley Drive
Santa Rosa, CA 95404
707-480-8115**

July 12, 2006

**Franklin Fueling Systems-Phil-Tite
3732 Electro Way
Redding, CA 96002**

**Subject: Certification Statement Auto Limiter II and other EBW Phase I equipment
for CARB Executive Order VR-101-F**

Based on a careful review and analysis I hereby certify that the modification to CARB Executive Order VR-101-E currently under consideration for California Air Resources Board (CARB) certification does not alter the operation or effectiveness of the Phil-Tite Phase I Vapor Recovery System as certified under EO VR-101-E.

The change is to include the EBW Auto Flow Limiter II Overflow Prevention Drop Tube Part NUMBER 708-491-XX and other EBW Phase I equipment. The EBW Auto Flow Limiter II and other EBW Phase I EVR equipment are currently approved in Executive Order VR-103-A.

The only change that is being made to the Auto Limiter II is the method of installation. The Auto Limiter II will be shipped from the factory already assembled and tested and will be installed using the same method as the currently approved 61SO-PT Overfill Prevention Valve with drop tube. All other equipment will remain the same as listed in EBW EO VR-103-A.

I reviewed the following materials:

1. CARB EO VR-101-E
2. Proposed Phil-Tite EO VR-101-F Update Index with 15 Sections and 3 drawings
3. CARB EO VR-103-A
4. Packet of Franklin Fueling Systems engineering drawings of equipment and parts
 - a. 40 8.5"x11" size
 - b. 9 11"x17" size


James H. Ray
Civil Engineer



Appendix

Certification Statement for the PHIL-TITE PHASE I EVR System¹

Based on a careful review and analysis, I hereby certify that the PHIL-TITE PHASE I EVR System, which is under consideration for California Air Resources Board (ARB) modification 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 PHIL-TITE PHASE I EVR System 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:

James H. Ray 7-22-06
Signed by Date
(California Professional Engineer)

Stan Brodecki 7-18-06
Signed by Date
(Company Representative)

James H. Ray
Printed Name

Stan Brodecki
Printed Name

(Individual)
Professional Engineer Company Name

Franklin Fueling System-PHIL-TITE
Equipment Manufacture Name

2041 Hidden Valley Drive
Mailing Address

3732 Electro Way
Mailing Address

Santa Rosa, CA 95404
City, State, Zip Code

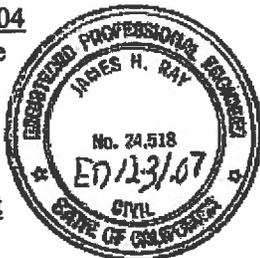
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City, State, Zip Code

707 480-8115
Phone Number

530 224 3810
Phone Number

jhray@sbcglobal.net
Email

BRODECKI@FRANKLINFUELING.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 PHIL-TITE 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.

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

February 4, 2013

Stan Brodecki
Product Marketing Manager-EVR Systems
Franklin Fueling Systems
5972 Country Manor Place
Sacramento, CA 95835-2152
Cell Phone 530 510 7297

RE: Third Party Review and Approval of Franklin Fueling Systems' Defender Series Spill Containment for addition to Phil-Tite E.O. VR-101

Dear Stan,

The following documents related to the Defender Series Spill Containment have been provided by Franklin Fueling Systems for examination and review:

1. Approvals
 - a. U.L. Certificate of Compliance #20100702-MH21091
 - b. Florida Department of Environmental Protection Approval of Franklin Fueling Systems 705-540 Series, Single-Walled, 705-550 Double Walled Series with Interstitial Integrity Gauge and 705-550 Double Walled Model with Incon-Intelligent Controls, FFS Model TSP-UIS Interstitial Sensor
2. Tests
 - a. Arco-Granite Bay, Certification for FFS Defender Series Spill Containers, 60 Day Test, August 23, 2012
3. General Information
 - a. Franklin Fueling Systems, Defender Series Model Number Reference Chart.
 - b. Request for Determination for Franklin Fueling Systems Defender Series Spill Container (Single Double Wall), California State Water Resources Control Board, January 2, 2013.
 - c. Defender Series Spill Container Summary of Features, Materials and Construction.

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

4. Training

- a. Training Information Phase I Vapor Recovery System
CARB EVR Approved Contractor Training Executive Order VR-101-(x) July
2012

5. Manuals

- a. Multiport Spill Containment with Defender™ Spill Containers Retrofit
Installation Guide Overview (Draft)
- b. Franklin Fueling Defender Series™ 5 Gallon, Single Walled, Field
Replaceable Spill Container Model 705-540 Series Installation, Operation, &
Maintenance F-9032 Rev. 2
- c. Franklin Fueling Systems Defender Series™ 5 Gallon, Double Walled, Field
Replaceable Spill Container Model 705-550 Series Installation, Operation, &
Maintenance F-9028 Rev. 4

Based on a careful review and analysis of this information, I hereby certify that the Defender Spill Containment will provide containment of spills and is testable in accordance with California Health and Safety Code, Chapter 6.7. The integrity of the double walled model of the spill containment can be verified either continuously or periodically by testing the interstitial space. Since riser pipe for the spill containment is not double walled, the installation of the Defender Spill Containment will meet the monitoring requirements of California AB 2481 only if it is installed in a sump that is monitored as required in California AB 2481.

Aaron M. Newman P.E.

Aaron M. Newman P.E.
Mechanical Engineer



Appendix

Certification Statement for the addition of the Defender Series Spill Container to Franklin Fueling System(FFS), Phil-Tite, Phase I Enhanced Vapor Recovery(EVR) System, Executive Order VR-101-M

Based on a careful review and analysis, I hereby certify that the installation of the Defender Spill Container in the Phil-Tite, 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.¹

Phil-Tite Phase I EVR System warrantee is valid as long as the system is installed and operated according to manufacturer's instructions and in a manner that does not exceed the limitations (e.g. tank capacity, fueling points, throughput, etc) described below.

Limitations:

The Defender Spill Container may be installed in areas where direct bury is permitted by Chapter 6.7 of the California Health and Safety Code. For installations in California that must meet California AB 2481 requirements the Defender Spill Container must be installed inside a sump that is AB2481 compliant.

Aaron M. Newman P.E. 4/10/13
Signed by Date
(California Professional Engineer)

Stan Brodecki 02/11/2013
Signed by Date
(Company Representative)

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

Stan Brodecki
Printed Name (Company Representative)

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

Franklin Fueling Systems
Equipment Manufacturer Name

3095 Skillman Ln.
Mailing Address

3760 Marsh Rd.
Mailing Address

Petaluma, CA 94952
City, State, Zip Code

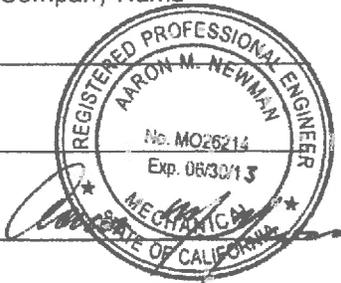
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City, State, Zip Code

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Phone Number

608-838-8786
Phone Number

anewman@comcast.net
Email

brodecki@franklinfueling.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 Franklin Fueling System(FFS), Phil-Tite, Phase I Enhanced Vapor Recovery(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 California Code of Regulations.

Aaron M. Newman P.E.
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anewmanpe@comcast.net

Enclosure 5
Page 1 of 3

February 8, 2013

Stan Brodecki
Product Marketing Manager-EVR Systems
Franklin Fueling Systems
5972 Country Manor Place
Sacramento, CA 95835-2152
Cell Phone 530 510 7297

RE: Third Party Review and Approval of Franklin Fueling Systems' Defender Series Spill Containment for addition to EBW E.O. VR-103

Dear Stan,

The following documents related to the Defender Series Spill Containment have been provided by Franklin Fueling Systems for examination and review:

1. Approvals
 - a. U.L. Certificate of Compliance #20100702-MH21091
 - b. Florida Department of Environmental Protection Approval of Franklin Fueling Systems 705-540 Series, Single-Walled, 705-550 Double Walled Series with Interstitial Integrity Gauge and 705-550 Double Walled Model with Incon-Intelligent Controls, FFS Model TSP-ULS Interstitial Sensor
2. Tests
 - a. Arco-Granite Bay, Certification for FFS Defender Series Spill Containers, 60 Day Test, August 23, 2012
3. General Information
 - a. Franklin Fueling Systems, Defender Series Model Number Reference Chart.
 - b. Request for Determination for Franklin Fueling Systems Defender Series Spill Container (Single Double Wall), California State Water Resources Control Board, January 2, 2013.
 - c. Defender Series Spill Container Summary of Features, Materials and Construction.

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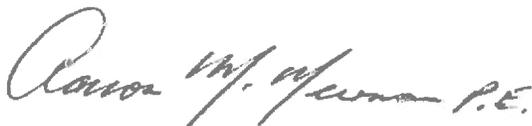
4. Training

- a. Training Information Phase I Vapor Recovery System
CARB EVR Approved Contractor Training Executive Order VR-101-(x) July
2012

5. Manuals

- a. Multiport Spill Containment with Defender™ Spill Containers Retrofit
Installation Guide Overview (Draft)
- b. Franklin Fueling Defender Series™ 5 Gallon, Single Walled, Field
Replaceable Spill Container Model 705-540 Series Installation, Operation, &
Maintenance F-9032 Rev. 2
- c. Franklin Fueling Systems Defender Series™ 5 Gallon, Double Walled, Field
Replaceable Spill Container Model 705-550 Series Installation, Operation, &
Maintenance F-9028 Rev. 4

Based on a careful review and analysis of this information, I hereby certify that the Defender Spill Containment will provide containment of spills and is testable in accordance with California Health and Safety Code, Chapter 6.7. The integrity of the double walled model of the spill containment can be verified either continuously or periodically by testing the interstitial space. Since riser pipe for the spill containment is not double walled, the installation of the Defender Spill Containment will meet the monitoring requirements of California AB 2481 only if it is installed in a sump that is monitored as required in California AB 2481.



Aaron M. Newman P.E.
Mechanical Engineer



2/8/13

Appendix

Certification Statement for the addition of the Defender Series Spill Container to Franklin Fueling System(FFS), EBW, Phase I Enhanced Vapor Recovery(EVR) System, Executive Order VR-103-F

Based on a careful review and analysis, I hereby certify that the installation of the Defender Series Spill Container in the EBW, 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 EBW Phase I EVR System warranty is valid as long as the system is installed and operated according to manufacturer's instructions and in a manner that does not exceed the limitations (e.g. tank capacity, fueling points, throughput, etc) described below.

Limitations:

The Defender Spill Container may be installed in areas where direct bury is permitted by Chapter 6.7 of the California Health and Safety Code. For installations in California that must meet California AB 2481 requirements the Defender Spill Container must be installed inside a sump that is AB2481 compliant.

Aaron M. Newman P.E. 2/18/13
Signed by _____ Date _____
(California Professional Engineer)

Stan Brodecki 02/11/2013
Signed by _____ Date _____
(Company Representative)

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

Stan Brodecki
Printed Name (Company Representative)

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

Franklin Fueling Systems
Equipment Manufacturer Name

3095 Skillman Ln
Mailing Address

3760 Marsh Rd.
Mailing Address

Petaluma, CA 94952
City, State, Zip Code

Madison, WI 53718
City, State, Zip Code

707-479-4594
Phone Number

608-838-8786
Phone Number

anewman@comcast.net
Email

brodecki@franklinfueling.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 **Franklin Fueling System(FFS), EBW, Phase I Enhanced Vapor Recovery(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 California Code of Regulations.

Aaron M. Newman P.E.
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July 13, 2015

James Novak, PE
Engineering Manager
Franklin Fueling Systems
3760 Marsh Road
Madison WI 53718
(608) 838-5645

RE: Third Party Review and Approval of Franklin Fueling Systems (FFS) Defender Series Overfill Prevention Valve, for addition to Phase I, Phil-Tite, EVR Executive Order VR-101

Dear James,

The following documents related to the FFS Defender Series Overfill Prevention Valve have been provided by Franklin Fueling Systems for examination and review:

1. Approvals
 - a. U.L. Certificate of Compliance #20141124-MH21090, Issue Date 2014-NOVEMBER-24
2. Cut-Away Assembly
 - a. Franklin Fueling Systems magnetically latched Defender Series Overfill Valve Assembly with material removed to expose the inner workings.
3. General Information
 - a. Franklin Fueling Systems, Performance Data for Electrocoated Materials
 - b. Franklin Fueling Systems, Metal and Alloy Fuel Test Results
 - c. Franklin Fueling Systems, POM copolymer, Tensile Retention & Dimensional Change When Subjected to Fuel
 - d. U.L. Fuel Compatibility of Viton B

Aaron M. Newman P.E.

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- e. Hytrel Thermo Polyester Elastomer Fuel Compatibility
- f. Oak Ridge National Laboratories, Fuel Tests Performed on Thermoplastics
- g. U.L. Nitrile Fuel Compatibility
- h. FFS Identification of materials previously approved for VR-101-N
- i. Defender Series Spill Container Summary of Features, Materials and Construction.
- j. Franklin Fueling Systems Letter, Dated July 10, 2015, Describing installation of Defender Series Overfill Prevention Valve into EBW, Phil-Tite, and Defender Series Spill Containments.

4. Manuals

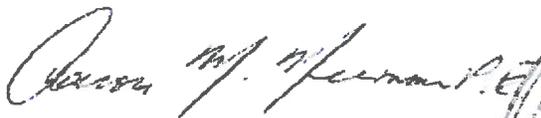
- a. Multiport Spill Containment with Defender™ Spill Containers New Installation Guide Overview
- b. Multiport Spill Containment with Defender™ Spill Containers Retrofit Installation Guide Overview
- c. Franklin Fueling Defender Series™ 5 Gallon, Single Walled, Field Replaceable Spill Container Model 705-540 Series Installation, Operation, & Maintenance F-9032 Rev. 2
- d. Franklin Fueling Systems Defender Series™ 5 Gallon, Double Walled, Field Replaceable Spill Container Model 705-550 Series Installation, Operation, & Maintenance F-9028 Rev. 5
- e. Franklin Fueling Systems Defender Series Model 708-590 , Overfill Prevention Valve, Automatic Shutoff for USTs, Installation, Operation and Maintenance. Manual # F-9044, Rev. 3

5. Drawings

- a. 705542, Defender Multiport Sw Bucket Asm, Gas/E85, CARB
- b. 705545, Defender Direct Bury Sw Bucket Asm, Gas/E85, CARB
- c. 705552, Defender Multiport Dw Bucket Asm, Gas/E85, CARB
- d. 705555, Defender Direct Bury Dw Bucket Asm, Gas/E85, CARB
- e. 708590, Assembly, Overfill Prevention Valve, SHT 1-6 CARB

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Based on a careful review and analysis of this information, I hereby certify that the Defender Series, Overfill Prevention Valve Automatic Shutoff for USTs, when installed in conjunction with EBW, Phil-Tite, and Defender Series Spill Containments, will provide automatic shutoff and is compatible with the other components previously approved for installation under VR 101 in accordance with California Health and Safety Code, Chapter 6.7. All of the Defender Series Overfill Prevention Valve materials of construction are compatible with both Gasoline and E85. The Defender Series Overfill Prevention Valve Automatic Shutoff for USTs will meet the monitoring requirements of California AB 2481 if installed in a sump that is monitored as required in California AB 2481.



Aaron M. Newman P.E.
Mechanical Engineer



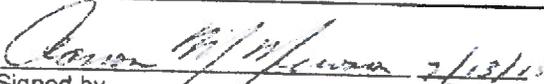
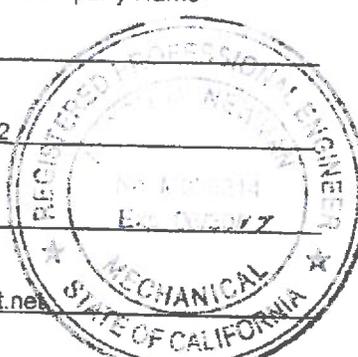
Appendix

Certification Statement for the addition of the Valve to Franklin Fueling System(FFS), PHIL-TITE, Phase I Enhanced Vapor Recovery(EVR) System, Executive Order Executive Order VR-101-O

Based on a careful review and analysis, I hereby certify that the installation of the Defender Series Spill Container in the PHIL-TITE, 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.²

The PHIL-TITE, Phase I EVR System warranty is valid as long as the system is installed and operated according to manufacturer's instructions and in a manner that does not exceed the limitations (e.g. tank capacity, fueling points, throughput, etc) described below.

Limitations:

<hr/>	
	
Signed by (California Professional Engineer)	Date
<u>Aaron M. Newman P.E.</u>	
Printed Name (California Professional Engineer)	
<u>Aaron M. Newman P.E.</u>	
Professional Engineer Company Name	
<u>3095 Skillman Ln.</u>	
Mailing Address	
<u>Petaluma, CA 94952</u>	
City, State, Zip Code	
<u>707-479-4594</u>	
Phone Number	
<u>anewman@comcast.net</u>	
Email	
	
Signed by (Company Representative)	Date
<u>James Novak, PE</u>	
Printed Name (Company Representative)	
<u>Franklin Fueling Systems</u>	
Equipment Manufacturer Name	
<u>3760 Marsh Rd.</u>	
Mailing Address	
<u>Madison, WI 53718</u>	
City, State, Zip Code	
<u>608-838-8786</u>	
Phone Number	
<u>JNovak@fele.com</u>	
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 Franklin Fueling System(FFS), PHIL-TITE, Phase I Enhanced Vapor Recovery(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 California Code of Regulations.

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July 13, 2015

James Novak, PE
Engineering Manager
Franklin Fueling Systems
3760 Marsh Road
Madison WI 53718
(608) 838-5645

RE: Third Party Review and Approval of Franklin Fueling Systems (FFS) Defender Series Overfill Prevention Valve, for addition to Phase I, EBW, EVR Executive Order VR-103

Dear James,

The following documents related to the FFS Defender Series Overfill Prevention Valve have been provided by Franklin Fueling Systems for examination and review:

1. Approvals
 - a. U.L. Certificate of Compliance #20141124-MH21090, Issue Date 2014-NOVEMBER-24
2. Cut-Away Assembly
 - a. Franklin Fueling Systems magnetically latched Defender Series Overfill Valve Assembly with material removed to expose the inner workings
3. General Information
 - a. Franklin Fueling Systems, Performance Data for Electrocoated Materials
 - b. Franklin Fueling Systems, Metal and Alloy Fuel Test Results
 - c. Franklin Fueling Systems, POM copolymer, Tensile Retention & Dimensional Change When Subjected to Fuel
 - d. U.L. Fuel Compatibility of Viton B
 - e. Hytrel Thermo Polyester Elastomer Fuel Compatibility
 - f. Oak Ridge National Laboratories, Fuel Tests Performed on Thermoplastics
 - g. U.L. Nitrile Fuel Compatibility
 - h. FFS Identification of materials previously approved for VR-101-N
 - i. Defender Series Spill Container Summary of Features, Materials and Construction.

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4. Manuals

- a. Multiport Spill Containment with Defender™ Spill Containers New Installation Guide Overview
- b. Multiport Spill Containment with Defender™ Spill Containers Retrofit Installation Guide Overview
- c. Franklin Fueling Defender Series™ 5 Gallon, Single Walled, Field Replaceable Spill Container Model 705-540 Series Installation, Operation, & Maintenance F-9032 Rev. 2
- d. Franklin Fueling Systems Defender Series™ 5 Gallon, Double Walled, Field Replaceable Spill Container Model 705-550 Series Installation, Operation, & Maintenance F-9028 Rev. 5
- e. Franklin Fueling Systems Defender Series Model 708-590 , Overfill Prevention Valve, Automatic Shutoff for USTs, Installation, Operation and Maintenance. Manual # F-9044, Rev. 3

5. Drawings

- a. 705542, Defender Multiport Sw Bucket Asm, Gas/E85, CARB
- b. 705545, Defender Direct Bury Sw Bucket Asm, Gas/E85, CARB
- c. 705552, Defender Multiport Dw Bucket Asm, Gas/E85, CARB
- d. 705555, Defender Direct Bury Dw Bucket Asm, Gas/E85, CARB
- e. 708590, Assembly, Overfill Prevention Valve, SHT 1-6 CARB

Based on a careful review and analysis of this information, I hereby certify that the Defender Series, Overfill Prevention Valve Automatic Shutoff for USTs, will provide automatic shutoff and is compatible with the other components previously approved for installation under VR 103 in accordance with California Health and Safety Code, Chapter 6.7. All of the Defender Series Overfill Prevention Valve materials of construction are compatible with both Gasoline and E85. The Defender Series Overfill Prevention Valve Automatic Shutoff for USTs will meet the monitoring requirements of California AB 2481 if installed in a sump that is monitored as required in California AB 2481.


Aaron M. Newman P.E.
Mechanical Engineer



Appendix

Certification Statement for the addition of the Valve to Franklin Fueling System(FFS), EBW, Phase I Enhanced Vapor Recovery(EVR) System, Executive Order Executive Order VR-103-H

Based on a careful review and analysis, I hereby certify that the installation of the Defender Series Spill Container in the EBW, 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.²

The EBW, Phase I EVR System warranty is valid as long as the system is installed and operated according to manufacturer's instructions and in a manner that does not exceed the limitations (e.g. tank capacity, fueling points, throughput, etc) described below.

Limitations:

Aaron M. Newman 7/13/15
Signed by _____ Date _____
(California Professional Engineer)

Signed by _____ Date _____
(Company Representative)

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

James Novak, PE
Printed Name (Company Representative)

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

Franklin Fueling Systems
Equipment Manufacturer Name

3095 Skillman Ln.
Mailing Address

3760 Marsh Rd.
Mailing Address

Petaluma, CA 94952
City, State, Zip Code

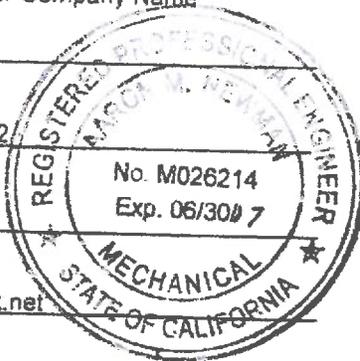
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¹This certification statement is part of the guidelines developed by the California Air Resources Board (ARB) and State Water Resources Control Board (State Water Board) to implement provisions of Assembly Bill 2955 (Statutes 2004, Chapter 649, McCarthy).

²This certification is based on the presumption that the **Franklin Fueling System(FFS), EBW, Phase I Enhanced Vapor Recovery(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 California Code of Regulations.

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July 16, 2015

James Novak, PE
Engineering Manager
Franklin Fueling Systems
3760 Marsh Road
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(608) 838-5645

RE: Third Party Review and Approval for use of Franklin Fueling Systems' Defender Series Spill Containment for E-85 service in conjunction with Phil-Tite E.O. VR-101 and EBW E.O. VR-103

Dear James,

The following documents related to the Defender Series Spill Containment have been provided by Franklin Fueling Systems for examination and review:

1. Approvals
 - a. U.L. Certificate of Compliance #20100702-MH21091
2. Tests
 - a. Drop Tube Overfill Prevention Device and Spill Container Drain Valve Test for FFS Defender Series Spill Containers, Dated May, 29, 2015 in Rocklin, CA.
3. General Information
 - a. Franklin Fueling Systems, Defender Series Model Number Reference Chart.
 - b. Defender Series Spill Container Summary of Features, Materials and Construction. (Viton B is used for all O-rings listed as Viton)
 - c. Franklin Fueling Systems, Metal and Alloy Fuel Test Results
 - d. Franklin Fueling Systems, POM copolymer, Tensile Retention & Dimensional Change When Subjected to Fuel
 - e. Franklin Fueling Systems, Performance Data for Electrocoated Materials

FSS Defender Series Spill Containment Approval Update 7-13-16- EBW E.O. VR- 101 &103

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- f. U.L. Fuel Compatibility of Viton B
- g. Hytrel Thermo Polyester Elastomer Fuel Compatibility
- h. Oak Ridge National Laboratories, Fuel Tests Performed on Thermoplastics
- i. U.L. Nitrile Fuel Compatibility
- j. FFS Identification of materials previously approved for VR-101-N

4. Manuals

- a. Multiport Spill Containment with Defender™ Spill Containers Retrofit Installation Guide Overview (Draft)
- b. Franklin Fueling Defender Series™ 5 Gallon, Single Walled, Field Replaceable Spill Container Model 705-540 Series Installation, Operation, & Maintenance F-9032 Rev. 2
- c. Franklin Fueling Systems Defender Series™ 5 Gallon, Double Walled, Field Replaceable Spill Container Model 705-550 Series Installation, Operation, & Maintenance F-9028 Rev. 4

Based on a careful review and analysis of this information, I hereby certify that the Defender Spill Containment will provide containment of spills and is testable in accordance with California Health and Safety Code, Chapter 6.7. All of the Defender Series Spill Containment materials of construction are compatible with both Gasoline and E85. The integrity of the double walled model of the spill containment can be verified either continuously or periodically by testing the interstitial space. Since riser pipe for the spill containment is not double walled, the installation does not meet the monitoring requirements of California AB 2481.


Aaron M. Newman P.E.
Mechanical Engineer

