Appendix II

May 2004 Joint SWRCB and ARB Letter to Phase I EVR Equipment Manufacturers and Associated Responses

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Terry Tamminen
Agency Secretary

Arnold Schwarzenegger
Governor

May 6, 2004

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

Dear Mr. Argandona:

URGENT REQUEST RELATED TO POST-INSTALLATION ENHANCED LEAK DETECTION TESTING OF PHASE 1 ENHANCED VAPOR RECOVERY EQUIPMENT

As you know, the California Air Resources Board (ARB) and the State Water Resources Control Board (SWRCB) regulate the operation of underground storage tanks (USTs) in California. Both the ARB and the SWRCB want to ensure that UST systems are installed properly and in accordance with manufacturer's procedures. We are writing to request you to fill out and return the enclosed form (Enclosure 1) by **4 PM, Tuesday, May 11, 2004**.

As you may be aware, the California Health and Safety Code requires that USTs installed on or after July 1, 2003 must be tested after installation, and before being placed into use, using enhanced leak detection (ELD) or other approved test method[1]. [Health and Safety. Code, Chapter 6.7, §25290.1.] At this time, the Enhanced Tracer Tight® test, developed by Praxair Services, Inc. (PSI), is the only approved test method that meets the ELD requirement. For post-installation testing, the Enhanced Tracer Tight® test requires the introduction of a tracer compound into the UST system to prepare for the test. Tracer can be mixed with the air in the tank, but the air inside the vapor recovery piping must be replaced by a tracer gas mixture. The latter is achieved by either the "Evacuation Inoculation Method" (EIM) or the "Displacement Inoculation Method" (DIM). Under EIM, a vacuum of 29 inches of mercury (14.2 pounds per square inch (psi)) is introduced within the piping and then the tracer gas mixture is added. The DIM is based on displacing the air inside the pipe by introducing the tracer gas mixture at a pressure of 0.5 psi (13.8 inches water column (WC)) at one end of the vapor piping and venting it out at the other end. After the air in the piping is replaced by the tracer

[1] In addition to ELD, the Health and Safety Code allows USTs installed on or after July 1, 2003 to be tested using an inert gas pressure test certified by a third party and approved by the SWRCB, or a test method deemed equivalent to ELD and approved by the SWRCB in regulation. [Health and Safety Code, Chapter 6.7, §25290.2(i).]

gas mixture, addition of the tracer gas mixture continues until the final pressure of 13.8 inches of WC is reached within the piping. These procedures are described in Enclosure 2. Please note that all lines and Phase 1-vapor recovery components, except for ball floats and pressure/vacuum vent valve, are subject to the vacuum and pressure indicated in Enclosure 2. Should you have questions or want more specific information regarding the ELD test protocol, please contact Mr. David Rabb, PSI, at (800) 989-9929, Extension 250.

We understand that PSI has been in contact with you or your representatives regarding this testing. We need to verify your company's position on the use of vacuum or pressure for your Phase 1 Enhanced Vapor Recovery (EVR) system during the post-installation ELD testing. Therefore, please review Enclosure 1, which outlines three tracer introduction scenarios, complete the form, and return it to us as requested. Your response will provide us with information regarding whether your ARB certified Phase 1 EVR system is compatible with the ELD test procedures and whether the warranty remains valid under any or all scenarios. The ARB would include information regarding the acceptable pressure and/or vacuum tolerances of your Phase I EVR system in the next revision of your ARB Executive Order.

In conclusion it is critical that we receive this information to ensure consistent and appropriate implementation of the ARB and SWRCB requirements and thereby protect California's air and water resources. We appreciate your attention to this matter and look forward to your timely response.

If you have questions regarding this letter, please contact Mr. George Lew of the ARB [(916) 327-0900; glew@arb.ca.gov] or Ms. Erin Ragazzi of the SWRCB [(916) 341-5863; ragazzie@swrcb.ca.gov].

Sincerely,

George Lew, Chief
Engineering and Certification Branch
Monitoring and Laboratory Division
Air Resources Board

Elizabeth L. Haven, Manager
Underground Storage Tank Program
Division of Water Quality
State Water Resources Control Board

Enclosures

cc: See Next Page

cc: Dr. Randy Golding, Praxair Services, Inc.
Richard Smith, San Diego County APCD

Air Resources Board

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Chairman
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Sacramento, California 95812 • www.arb.ca.gov

Terry Tamminen
Agency Secretary

Arnold Schwarzenegger
Governor

May 6, 2004

Mr. Don Kenney, President
Franklin Fueling Systems
F. E. Petro
4805 Voges Road
P. O. Box 139
McFarland, Wisconsin 53558

Dear Mr. Kenney:

URGENT REQUEST RELATED TO POST-INSTALLATION ENHANCED LEAK DETECTION TESTING OF PHASE I ENHANCED VAPOR RECOVERY EQUIPMENT

As you know, the California Air Resources Board (ARB) and the State Water Resources Control Board (SWRCB) regulate the operation of underground storage tanks (USTs) in California. Both the ARB and the SWRCB want to ensure that UST systems are installed properly and in accordance with manufacturer's procedures. We are writing to request you to fill out and return the enclosed form (Enclosure 1) by **4 PM, Tuesday, May 11, 2004**.

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[1] In addition to ELD, the Health and Safety Code allows USTs installed on or after July 1, 2003 to be tested using an inert gas pressure test certified by a third party and approved by the SWRCB, or a test method deemed equivalent to ELD and approved by the SWRCB in regulation. [Health and Safety Code, Chapter 6.7, §25290.2(i).]

at a pressure of 0.5 psi (13.8 inches water column (WC)) at one end of the vapor piping and venting it out at the other end. After the air in the piping is replaced by the tracer gas mixture, addition of the tracer gas mixture continues until the final pressure of 13.8 inches of WC is reached within the piping. These procedures are described in Enclosure 2. Please note that all lines and Phase I-vapor recovery components, except for ball floats and pressure/vacuum vent valve, are subject to the vacuum and pressure indicated in Enclosure 2. Should you have questions or want more specific information regarding the ELD test protocol, please contact Mr. David Rabb, PSI, at (800) 989-9929, Extension 250.

We understand that PSI has been in contact with you or your representatives regarding this testing. We need to verify your company's position on the use of vacuum or pressure for your Phase I Enhanced Vapor Recovery (EVR) system during the post-installation ELD testing. Therefore, please review Enclosure 1 which outlines three tracer introduction scenarios, complete the form, and return it to us as requested. Your response will provide us with information regarding whether your ARB certified Phase I EVR system is compatible with the ELD test procedures and whether the warranty remains valid under any or all scenarios. The ARB would include information regarding the acceptable pressure and/or vacuum tolerances of your Phase I EVR system in the next revision of your ARB Executive Order.

In conclusion it is critical that we receive this information to ensure consistent and appropriate implementation of the ARB and SWRCB requirements and thereby protect California's air and water resources. We appreciate your attention to this matter and look forward to your timely response.

If you have questions regarding this letter, please contact Mr. George Lew of the ARB [(916) 327-0900; glew@arb.ca.gov] or Ms. Erin Ragazzi of the SWRCB [(916) 341-5863; ragazzie@swrcb.ca.gov].

Sincerely,

George Lew, Chief
Engineering and Certification Branch
Monitoring and Laboratory Division
Air Resources Board

Elizabeth L. Haven, Manager
Underground Storage Tank Program
Division of Water Quality
State Water Resources Control Board

Enclosures

cc: See Next Page

cc: Dr. Randy Golding, Praxair Services, Inc.
Richard Smith, San Diego County APCD
Jim Biesecker, EBW

Air Resources Board

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Sacramento, California 95812 • www.arb.ca.gov

Terry Tamminen
Agency Secretary

Arnold Schwarzenegger
Governor

May 6, 2004

Mr. Jim Walton
Vice President –Environmental Systems
OPW
9393 Princeton-Glendale Road
Hamilton, OH USA 45011

Dear Mr. Walton:

URGENT REQUEST RELATED TO POST-INSTALLATION ENHANCED LEAK DETECTION TESTING OF PHASE 1 ENHANCED VAPOR RECOVERY EQUIPMENT

As you know, the California Air Resources Board (ARB) and the State Water Resources Control Board (SWRCB) regulate the operation of underground storage tanks (USTs) in California. Both the ARB and the SWRCB want to ensure that UST systems are installed properly and in accordance with manufacturer's procedures. We are writing to request you to fill out and return the enclosed form (Enclosure 1) by **4 PM, Tuesday, May 11, 2004**.

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[1] In addition to ELD, the Health and Safety Code allows USTs installed on or after July 1, 2003 to be tested using an inert gas pressure test certified by a third party and approved by the SWRCB, or a test method deemed equivalent to ELD and approved by the SWRCB in regulation. [Health and Safety Code, Chapter 6.7, §25290.2(i).]

and venting it out at the other end. After the air in the piping is replaced by the tracer gas mixture, addition of the tracer gas mixture continues until the final pressure of 13.8 inches of WC is reached within the piping. These procedures are described in Enclosure 2. Please note that all lines and Phase 1-vapor recovery components, except for ball floats and pressure/vacuum vent valve, are subject to the vacuum and pressure indicated in Enclosure 2. Should you have questions or want more specific information regarding the ELD test protocol, please contact Mr. David Rabb, PSI, at (800) 989-9929, Extension 250.

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Sincerely,

George Lew, Chief
Engineering and Certification Branch
Monitoring and Laboratory Division
Air Resources Board

Elizabeth L. Haven, Manager
Underground Storage Tank Program
Division of Water Quality
State Water Resources Control Board

Enclosures

cc: See Next Page

cc: Dr. Randy Golding, Praxair Services, Inc.
Richard Smith, San Diego County APCD
Peter Manger, OPW

Air Resources Board

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Terry Tamminen
Agency Secretary

Arnold Schwarzenegger
Governor

May 6, 2004

Mr. Philip E. Smith, President
Phil-Tite Enterprises
3732 Electro Way
Redding, California 96002

Dear Mr. Smith:

URGENT REQUEST RELATED TO POST-INSTALLATION ENHANCED LEAK DETECTION TESTING OF PHASE 1 ENHANCED VAPOR RECOVERY EQUIPMENT

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If you have questions regarding this letter, please contact Mr. George Lew of the ARB [(916) 327-0900; glew@arb.ca.gov] or Ms. Erin Ragazzi of the SWRCB [(916) 341-5863; ragazzie@swrcb.ca.gov].

Sincerely

George Lew, Chief
Engineering and Certification Branch
Monitoring and Laboratory Division
Air Resources Board

Elizabeth L. Haven, Manager
Underground Storage Tank Program
Division of Water Quality
State Water Resources Control Board

Enclosures

cc: See Next Page

cc: Dr. Randy Golding, Praxair Services, Inc.
Richard Smith, San Diego County APCD

Enclosure 1

POST-INSTALLATION ENHANCED LEAK DETECTION TESTING OF PHASE 1 ENHANCED VAPOR RECOVERY EQUIPMENT

Please complete this form and fax it to:

Mr. George Lew
California Air Resources Board
(916) 327-8217

I hereby certify that the Phase I vapor recovery system as described by ARB Executive Order VR-___ is approved for use and the warranty is valid under the following (check all that apply, please specify maximum pressure limit if applicable):

[X] Scenario 1: The Phase 1 EVR equipment is exposed to a vacuum of approximately 29 inches of mercury for a few minutes to prepare for the introduction of the tracer compound. Once introduced, the Phase 1 EVR equipment is exposed to a pressure of 14 inches of water column (0.5-psig) for the duration of the test[1].

[X] Scenario 2: The Phase 1 EVR equipment is exposed to a pressure of 14 inches of water column during the test. Air is displaced from the Phase 1 EVR equipment and the connected vapor recovery and vent piping as the tracer gas mixture is added. The tracer gas mixture is added at one end of the piping and air is vented from the other. After the air is displaced, the Phase 1 EVR equipment is exposed to 14 inches of water column during the duration of the test[1].

[X] Scenario 3: The Phase 1 EVR equipment is not isolated from the tank. Tracer is added to the tank and the Phase 1 EVR equipment is tested along with the tank. The tank is pressurized to 14 inches of water column. The Phase 1 EVR equipment is exposed to a pressure of 14 inches of water column for the duration of the test[1].

[ ] Other (Please specify) _____

Signed by — MAY 11, 2004 — Date

TOBY ARGANDONA
Printed Name

CNI MANUFACTURING
Company Name

15627 ARROW HIGHWAY
Mailing Address

IRWINDALE, CA 91706
City, State, Zip Code

626-962-6646 INFO@CNI-MFG.COM
Phone Number /e-mail

[1] Please note that the Phase 2 EVR equipment (e.g., nozzles, etc.) is not evaluated during the post-installation ELD test. (The test evaluates piping from the top of the tank to the shear valve.)

Enclosure 1

POST-INSTALLATION ENHANCED LEAK DETECTION TESTING OF PHASE 1 ENHANCED VAPOR RECOVERY EQUIPMENT

Please complete this form and fax it to:

Mr. George Lew
California Air Resources Board
(916) 327-8217

I hereby certify that the Phase I vapor recovery system as described by ARB Executive Order VR-___ is approved for use and the warranty is valid under the following (check all that apply, please specify maximum pressure limit if applicable):

☐ Scenario 1: The Phase 1 EVR equipment is exposed to a vacuum of approximately 29 inches of mercury for a few minutes to prepare for the introduction of the tracer compound. Once introduced, the Phase 1 EVR equipment is exposed to a pressure of 14 inches of water column (0.5-psig) for the duration of the test[1].

☒ Scenario 2: The Phase 1 EVR equipment is exposed to a pressure of 14 inches of water column during the test. Air is displaced from the Phase 1 EVR equipment and the connected vapor recovery and vent piping as the tracer gas mixture is added. The tracer gas mixture is added at one end of the piping and air is vented from the other. After the air is displaced, the Phase 1 EVR equipment is exposed to 14 inches of water column during the duration of the test[1].

☒ Scenario 3: The Phase 1 EVR equipment is not isolated from the tank. Tracer is added to the tank and the Phase 1 EVR equipment is tested along with the tank. The tank is pressurized to 14 inches of water column. The Phase 1 EVR equipment is exposed to a pressure of 14 inches of water column for the duration of the test[1].

☐ Other (Please specify) _____

Signed by 5/7/04
Date

Don Kenney
Printed Name

EBW (Franklin Fueling Systems)
Company Name

4805 Voges Rd
Mailing Address

McFarland, WI 53558
City, State, Zip Code

(608) 838-5618 / kenney@franklinfueling.com
Phone Number /e-mail

[1] Please note that the Phase 2 EVR equipment (e.g., nozzles, etc.) is not evaluated during the post-installation ELD test. (The test evaluates piping from the top of the tank to the shear valve.)

Enclosure 1

POST-INSTALLATION ENHANCED LEAK DETECTION TESTING OF PHASE 1 ENHANCED VAPOR RECOVERY EQUIPMENT

Please complete this form and fax it to:

Mr. George Lew
California Air Resources Board
(916) 327-8217

I hereby certify that the Phase I vapor recovery system as described by ARB Executive Order VR-102 is approved for use and the warranty is valid under the following (check all that apply, please specify maximum pressure limit if applicable):

☐ Scenario 1: The Phase 1 EVR equipment is exposed to a vacuum of approximately 29 inches of mercury for a few minutes to prepare for the introduction of the tracer compound. Once introduced, the Phase 1 EVR equipment is exposed to a pressure of 14 inches of water column (0.5-psig) for the duration of the test[1].

☒ Scenario 2: The Phase 1 EVR equipment is exposed to a pressure of 14 inches of water column during the test. Air is displaced from the Phase 1 EVR equipment and the connected vapor recovery and vent piping as the tracer gas mixture is added. The tracer gas mixture is added at one end of the piping and air is vented from the other. After the air is displaced, the Phase 1 EVR equipment is exposed to 14 inches of water column during the duration of the test[1].

☒ Scenario 3: The Phase 1 EVR equipment is not isolated from the tank. Tracer is added to the tank and the Phase 1 EVR equipment is tested along with the tank. The tank is pressurized to 14 inches of water column. The Phase 1 EVR equipment is exposed to a pressure of 14 inches of water column for the duration of the test[1].

☐ Other (Please specify) _____

Jim Walton — May 11, 2004
Signed by VICE PRESIDENT — Date

Jim Walton
Printed Name

OPW Fueling Components
Company Name

P.O. Box 405003
Mailing Address

Cincinnati OH 45240
City, State, Zip Code

513-870-3144
Phone Number /e-mail

jwalton@opw-fc.com

[1] Please note that the Phase 2 EVR equipment (e.g., nozzles, etc.) is not evaluated during the post-installation ELD test. (The test evaluates piping from the top of the tank to the shear valve.)

Enclosure 1

POST-INSTALLATION ENHANCED LEAK DETECTION TESTING OF PHASE 1 ENHANCED VAPOR RECOVERY EQUIPMENT

Please complete this form and fax it to:

Mr. George Lew
California Air Resources Board
(916) 327-8217

I hereby certify that the Phase I vapor recovery system as described by ARB Executive Order VR-___ is approved for use and the warranty is valid under the following (check all that apply, please specify maximum pressure limit if applicable):

☑ Scenario 1: The Phase 1 EVR equipment is exposed to a vacuum of approximately 29 inches of mercury for a few minutes to prepare for the introduction of the tracer compound. Once introduced, the Phase 1 EVR equipment is exposed to a pressure of 14 inches of water column (0.5-psig) for the duration of the test[1].

☑ Scenario 2: The Phase 1 EVR equipment is exposed to a pressure of 14 inches of water column during the test. Air is displaced from the Phase 1 EVR equipment and the connected vapor recovery and vent piping as the tracer gas mixture is added. The tracer gas mixture is added at one end of the piping and air is vented from the other. After the air is displaced, the Phase 1 EVR equipment is exposed to 14 inches of water column during the duration of the test[1].

☑ Scenario 3: The Phase 1 EVR equipment is not isolated from the tank. Tracer is added to the tank and the Phase 1 EVR equipment is tested along with the tank. The tank is pressurized to 14 inches of water column. The Phase 1 EVR equipment is exposed to a pressure of 14 inches of water column for the duration of the test[1].

☐ Other (Please specify) _____

Signed by 5/10/04 Date

PHILIP SMITH
Printed Name

PHIL-TITE ENT.
Company Name

3782 ELECTRO WAY ELECTRO WAY
Mailing Address

REDDING CA. 96002
City, State, Zip Code

(530) 223-7400 PHIL-TITE@MSN.COM
Phone Number /e-mail STANB@PHIL-TITE.COM

[1] Please note that the Phase 2 EVR equipment (e.g., nozzles, etc.) is not evaluated during the post-installation ELD test. (The test evaluates piping from the top of the tank to the shear valve.)