



Linda S. Adams
*Secretary for
Environmental Protection*

State Water Resources Control Board

Executive Office

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Arnold Schwarzenegger
Governor

March 26, 2008

Mr. John Fecteau
Veeder-Root
125 Powder Forest Drive
Simsbury, CT 06070

Dear Mr. Fecteau:

EVALUATION OF THE VEEDER-ROOT IN-STATION DIAGNOSTICS SYSTEM (VR-202-E)

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.

We have received information from you providing a detailed explanation of the Veeder-Root In-Station Diagnostics (ISD) system, which has been designed to meet the ARB requirements for ISD. The system consists of a vapor flow meter(s) and pressure sensor that provide data to the model TLS-350 control panel. The control panel monitors various functions of the Phase I EVR and Phase II EVR systems, and will alert the UST operator when the performance of those systems exceeds allowable specifications. The system can also control and monitor the performance of a vapor processor, such as the Vapor Systems Technologies (VST) ECS Membrane Processor. The design, installation, and operation of the Veeder-Root ISD system have been 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 Veeder-Root ISD system conflicts with H&SC Chapter 6.7.

California regulations¹ specify that any installation, repair, maintenance, or programming of monitoring equipment must be done by a qualified service technician meeting the requirements of California Code of Regulations, Title 23, section 2715(i). Individuals wishing to install Veeder-Root ISD system should be aware that, in cases

¹ California Code of Regulations, Title 23, sections 2611 and 2638.

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where the TLS-350 control panel is serving to meet any portion of the State Water Board's UST system monitoring requirements, section 2715(i) applies. This includes cases where the TLS-350 control panel is used to monitor and/or control electronic line leak detectors, interstitial liquid sensors, interstitial vacuum sensors, or automatic tank gauging systems. In those cases, all work related to the TLS-350 control panel must be performed by a qualified service technician.

Pursuant to H&SC section 25290.1.2(a) the State Water Board certifies that, to the best of its knowledge, the Veeder-Root ISD system meets the requirements of H&SC Chapter 6.7. This determination applies to use of the Veeder-Root ISD system in conjunction with the Franklin Fueling / Healy Phase II EVR system or the Vapor Systems Technologies (VST) Phase II EVR system, as well as other Phase II EVR systems that are approved by ARB and are similar to the Healy or VST systems. This determination assumes the Veeder-Root ISD system is installed in accordance with applicable ARB Executive Orders, manufacturer's instructions, and the limitations outlined in this letter.

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,


for Dorothy Rice
Executive Director

Enclosure: Certification Statement for the Veeder-Root ISD System

cc: Mr. George Lew, Chief
Engineering and Certification Branch
Air Resources Board
1927 Thirteenth Street
Sacramento, California 95812

Certification Statement for the Veeder-Root In-Station Diagnostics (ISD) System for California Air Resources Board (ARB) Approved Phase II Enhanced Vapor Recovery (EVR) Assist and Balance Systems¹

Based on a careful review and analysis, I hereby certify that the **Veeder-Root In-Station Diagnostics (ISD) system for California Air Resources Board (ARB) Approved Phase II Enhanced Vapor Recovery (EVR) Assist and Balance Systems**, 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

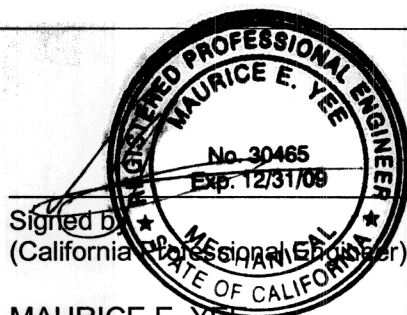
The **Veeder-Root In-Station Diagnostics (ISD) system for California Air Resources Board (ARB) Approved Phase II Enhanced Vapor Recovery (EVR) Assist and Balance Systems** warranty is valid as long as the system is installed, operated, and maintained according to manufacturer's instructions and in a manner that does not exceed the limitations (e.g., tank capacity, fueling points, throughputs, etc.) described below.

Limitations:

The ISD system must be installed, maintained and operated in accordance with the California Air Resources Board

"Executive Order VR-202-E", Veeder-Root In-Station Diagnostics (ISD) System and the ARB – Approved (IOM)

"Installation, Operation and Maintenance Manuals" which is a part of the Executive Order.



Signed by
(California Professional Engineer)

MAURICE E. YEE
Printed Name (California Professional Engineer)

RPM ENGINEERS, INC.
Professional Engineer Company Name

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3/13/08
Date

Signed by
(Company Representative)

JOHN FECTEAU
Printed Name (Company Representative)

VEEDER-ROOT COMPANY
Equipment Manufacturer Name

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Date

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 Veeder-Root In-Station Diagnostics (ISD) system for California Air Resources Board (ARB) Approved Phase II Enhanced Vapor Recovery (EVR) Assist and Balance Systems 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.