



Linda S. Adams  
Secretary for  
Environmental Protection

# State Water Resources Control Board

## Division of Water Quality

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Arnold Schwarzenegger  
Governor

July 17, 2008

Mr. Randall Boucher  
Franklin Fueling Systems  
92 Industrial Park Road  
Saco, ME 04072

Dear Mr. Boucher:

### EVALUATION OF THE FRANKLIN FUELING SYSTEMS MODEL NUMBERS TD-DTU AND TS-DRK

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 California 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 Data Transfer Unit (TD-DTU) and the DTU Dispenser Installation Kit (TS-DRK) which has been designed to meet the ARB requirements. Based on the information that you provided, we have found no evidence that the TD-DTU or the TS-DRK conflicts with H&SC Chapter 6.7.

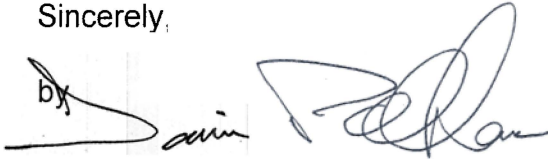
California regulations specify<sup>1</sup> that any installation, repair, maintenance, or programming of monitoring equipment must be done by a qualified service technician meeting the requirements of California Code of Regulations, Title 23, section 2715(i). Individuals wishing to install the TD-DTU and TS-DRK should be aware that, in cases where these components are serving to meet any portion of the State Water Board's UST system monitoring requirements, section 2715(i) applies.

Pursuant to H&SC section 25290.1.2(a), the State Water Board certifies that, to the best of its knowledge, the Franklin Fueling Systems TD-DTU and TS-DRK components meet the requirements of H&SC Chapter 6.7. This determination assumes the Franklin Fueling Systems TD-DTU and TS-DRK are installed in accordance with applicable ARB Executive Orders and manufacturer's instructions.

<sup>1</sup>California Code of Regulations, Title 23, sections 2611 and 2638

If you have questions regarding this letter, please contact Ms. Laura Fisher-Chaddock at (916) 341-5870, or by email at [lfchaddock@waterboards.ca.gov](mailto:lfchaddock@waterboards.ca.gov).

Sincerely,

by 

Darrin Polhemus, Deputy Director  
Division of Water Quality

cc: Mr. George Lew, Chief  
ARB Engineering and Certification Branch  
1927 13<sup>th</sup> Street  
Sacramento, CA 95812