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## State Water Resources Control Board

October 2, 2024

Mr. Dave Emmington  
Veeder-Root  
125 Powder Forest Drive  
Simsbury, CT 06070-7684

Dear Mr. Emmington:

### **EVALUATION OF THE ARID PERMEATOR AT-150 PROCESSOR USED WITH THE VEEDER-ROOT TLS-450PLUS**

Section 25290.1.2(a) of the Health and Safety Code (H&SC) requires the California Air Resources Board (CARB) 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 CARB's Enhanced Vapor Recovery (EVR) requirements also meets underground storage tank (UST) requirements located in H&SC, division 20, chapter 6.7, section 25280 et seq (H&SC chapter 6.7) and title 23, division 3, chapter 16 (UST Regulations).

On, May 24, 2024, the State Water Board received the enclosed documentation detailing the Arid Permeator AT-150 Processor (AT-150) used with Veeder-Root's TLS-450PLUS monitoring panel with In-Station Diagnostics (ISD). Based on the information provided, the State Water Board has found no evidence that the AT-150 in combination with the TLS-450PLUS conflicts with the requirements in H&SC chapter 6.7 or UST Regulations. This determination assumes the AT-150 and the TLS-450PLUS are installed in accordance with applicable CARB Executive Orders and manufacturer's instructions as required by UST Regulations. Therefore, the State Water Board certifies, to the best of its knowledge, that the AT-150 in combination with the TLS-450PLUS meets the requirements of H&SC chapter 6.7 and the UST Regulations.

### **Vent and Vapor Recovery Piping**

For UST systems installed prior to July 1, 2003, vent and vapor piping is excluded from the statutory definition of "underground storage tank" if the vent and vapor piping is designed to prevent, and does not hold, standing fluid. Based on the information submitted, the addition of the AT-150 does not increase the likelihood of liquid-phase product accumulating in the vent or vapor recovery piping, because the AT-150 does

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E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

not condense the vapors to the liquid-phase. Because the information submitted indicates the addition of the AT-150 does not increase the likelihood of liquid-phase product accumulating in the vent or vapor recovery piping, vent and vapor recovery piping connected to USTs installed before July 1, 2003, that are currently excluded from the definition of “underground storage tank” may continue to be excluded.

[H&SC, section 25281.5(a)(4).]

### **Liquid Condensate Trap (Vapor Pot)**

When liquid or vapor condensate traps are connected to USTs, the condensate traps are part of the UST system, and therefore, are required to meet the design, construction, operation, and maintenance requirements set forth at the time of the UST installation.

[H&SC, sections 25290.1, 25290.2, 25291, & 25292.]

### **Nozzles, Hoses, and Pressure/Vacuum Vent Valves**

The following EVR components are excluded from the statutory definition of “pipe” or are aboveground vapor recovery components that are not part of the UST system regulated by the State Water Board.

1. Unburied delivery hoses, vapor recovery hoses, and nozzles that are subject to unobstructed visual inspection for leakage.
2. Pressure/Vacuum vent valves that are installed above ground on tank vent piping. To minimize the burden of the EVR Multi Agency Review Process on manufacturers, the State Water Board has determined that review of these components on an individual basis is not necessary.

[H&SC, section 25281.5(a)(3).]

### **Leak Detection Monitoring Panel**

UST Regulations specify that any installation, repair, maintenance, or programming of monitoring equipment must be done by a qualified service technician meeting the requirements of section 2715(f)(2)(B) of the UST Regulations. Installation of the AT-150 involves adding sensors, wiring, and possibly software to a Veeder-Root console. In cases where the TLS-450PLUS console is being used to satisfy monitoring requirements for the UST system, all work related to the console must be performed by a qualified service technician. This includes cases where the console is used to monitor

or control electronic line leak detectors, interstitial liquid sensors, interstitial vacuum sensors, or automatic tank gauging systems.

[H&SC, sections 2611 & 2638.]

Pursuant to H&SC, section 25290.1.2(a), the State Water Board certifies that, to the best of its knowledge, the TLS-450PLUS with ISD in combination with the AT-150 meets the requirements of UST Statutes. This determination assumes the TLS-450PLUS and AT-150 is installed in accordance with applicable CARB Executive Orders, the manufacturer's instructions, the limitations outlined in this letter, and as required by UST Statutes and UST Regulations. If you have questions regarding this letter, please contact Mr. Austin Lemire-Baeten by phone at (916) 327-5612 or by email at [Austin.Lemire-Baeten@waterboards.ca.gov](mailto:Austin.Lemire-Baeten@waterboards.ca.gov).

Sincerely,



Phil Crader, Deputy Director  
Division of Water Quality  
State Water Resources Control Board  
[Phillip.Crader@waterboards.ca.gov](mailto:Phillip.Crader@waterboards.ca.gov)

Enclosures:

- 1) Final Certification Summary Arid Assist with VR ISD
- 2) Permeator Product Brochure

cc:

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