January 7, 2015

Mr. David Russell, President
Tank Tech Inc.
P.O. Box 17
Blodgett, MO 63824

Dear Mr. Russell:

TANK TECH INC. INTERNAL STAND ALONE TANK SYSTEM

This letter is in response to your inquiry concerning the eligibility of installing the Internal Stand Alone Tank System (I-SATS) in California and is not an approval by the State Water Resources Control Board (State Water Board). This letter is not and shall not be used as an endorsement from the State Water Board for the I-SATS.

The State Water Board staff has reviewed the I-SATS and has determined that the I-SATS is a "tank" as defined in Health and Safety Code (H&SC), chapter 6.7, section 25281(u). Therefore, the I-SATS must meet all applicable laws and regulations for an underground storage tank (UST) set forth in H&SC, chapter 6.7 and California Code of Regulations, title 23, chapter 16. These requirements include, but are not limited to:

- The existing UST, tank and connected pipe, in which the I-SATS will be internally installed, must be permanently closed in accordance with California Code of Regulations, title 23, chapter 16, section 2672, including the proper soil and groundwater sampling for the tank and all connected pipe.
- The existing tank, in which the I-SATS will be internally installed, and any existing connected pipe that will be used with the I-SATS that can meet the requirements of H&SC, chapter 6.7, section 25290.1 must be closed in place in accordance with California Code of Regulations, title 23, chapter 16, section 2672(c).
- The installation of the I-SATS is a UST installation; therefore, the contractor installing the I-SATS must, in accordance with H&SC chapter 6.7, section 25284.1(a)(5)(D)(ii), possess the appropriate Contractors State Licensing Board license, with a Hazardous Substance Certification, and International Code Council Certification for installing USTs in addition to manufacturer certification if the contractor is not the manufacturer of the I-SATS.

- The entire UST system in which the I-SATS will be internally installed into, existing or new components, including but not limited to, the tank, connected piping, under dispenser containment, and monitored sumps are subject to the requirements in H&SC, chapter 6.7, section 25290.1.

- If the existing UST in which the I-SATS will be internally installed into is located in a flood plain as defined by the Federal Emergency Management Agency then the tank must be anchored or secured by approved means to resist movement when subject to hydrostatic forces associated with high groundwater or floodwater as required by California Code of Regulations, title 8, chapter 4, section 5605.

- The installation must be properly conducted in accordance with H&SC, chapter 6.7, California Code of Regulations, title 23, chapter 16, applicable local ordinances, and any additional manufacturer specifications.

- Before installation, the UST owner or operator must provide to the Unified Program Agency (UPA) a Manufacturer's Affirmative Statement of Compatibility for the intended stored substance not covered by the Underwriter's Laboratory (UL) certification as required by California Code of Regulations, title 23, chapter 16, section 2631(j).

- Before installation, Tank Tech Inc. will provide to the UPA the I-SATS installation reference "The Stand Alone System, A Self Structural Retrofit for USTs" (Version 1.2, November 21, 2013), so that the UPA may track the process of the installation, schedule site visits to coincide with the I-SATS listed "primary events," and for permitting purposes.

- In addition to the final tests specified in "The Stand Alone System, A Self Structural Retrofit for USTs" (Version 1.2, November 21, 2013), Section 9: Final Inspection and Quality Control Procedures, page 12, the I-SATS's secondary containment must pass a post-installation test in accordance with H&SC, chapter 6.7, section 25290.1 and California Code of Regulations, title 23, chapter 16, section 2635(a)(3).

- The UL certification of the I-SATS certifies the interstitial space of the I-SATS to be monitored for leakage by vacuum (up to a maximum of 15.5 inches of mercury), pressure (up to a maximum of 6.2 pounds per square inch), or hydrostatic brine (specific gravity not exceeding 1.3), these methods must comply with H&SC, chapter 6.7, section 25290.1(e) and California Code of Regulations, title 23, chapter 16, section 2631(g).

- After installation, but before the UST is placed into use, the I-SATS must pass an enhanced leak detection test to demonstrated that the UST is impervious to the liquid and vapor of the substance that is contained, or is to be contained, so as to prevent seepage of the substance from the containment as required by H&SC, chapter 6.7, section 25290.1(j).

The I-SATS also must be installed, maintained, and operated in accordance with the requirements and limitations set forth in the UL certification and Tank Tech Inc.'s I-SATS installation reference "The Stand Alone System, A Self Structural Retrofit for USTs" (Version 1.2, November 21, 2013). The following requirements and limitations for use of the I-SATS include, but are not limited to:

- Use with existing single-walled and double-walled tanks meeting "UL 1316 - Glass-Fiber-Reinforced Plastic Underground Storage Tanks for Petroleum Products, Alcohols, and Alcohol-Gasoline Mixtures" or "UL 58 - Standard for Safety for Steel Underground Tanks for Flammable and Combustible Liquids" or "UL 1746 - External Corrosion Protection Systems for Steel Underground Storage Tanks."
- Existing USTs up to and including 120 inches in diameter.
- Existing USTs that have not deflected more than 2 percent of the nominal diameter.
- Existing USTs that have not been abandoned or left unattended for an extended period of time.
- Only those contractors specifically authorized, trained, and certified by Tank Tech Inc. are permitted to install any portion of the I-SATS.
- As noted in "The Stand Alone System, A Self Structural Retrofit for USTs" (Version 1.2, November 21, 2013), at the end of each "primary event" an inspection by a manufacturer trained individual is required to take place before going on to the next step. These inspections must be documented on a process verification sheet, signed off by the crew leader and/or field supervisor, and provided to the UPA. Tank Tech Inc. must coordinate with the UPA in advance in order for the UPA to be present for theses "primary events."

The UST owner or operator must seek approval and obtain any required permits from the appropriate UPA before installing the I-SATS. (The UPA directory is located at http://cersapps.calepa.ca.gov/Public/UPAListing) In addition, the UST owner or operator may be required to obtain approval from other authorities having jurisdiction, such as the local fire marshal, the California Air Resource Board, or the Occupational Safety and Health Administration, before installing the I-SATS.

Tank Tech Inc. must notify the State Water Board UST program immediately of any revisions to "The Stand Alone System, A Self Structural Retrofit for USTs" (Version 1.2, November 21, 2013), or to the I-SATS UL certification dated September 12, 2012, as well as any modifications to the installation procedures as a result of any field based findings.

To confirm that we have correctly captured the I-SATS compliance with California Code of Regulations, title 23, chapter 16 and H&SC chapter 6.7, please notify me or Mr. Cory Hootman via e-mail of all applications submitted to any UPA. Also, please provide

copies of all permits issued for the installation of the I-SATS until further notice. If you have any questions pertaining to the details of this letter, please contact Mr. Cory Hootman at (916) 341-5668 or via email at cory.hootman@waterboards.ca.gov.

Sincerely,

Laura S. Fisher, Chief
UST Leak Prevention and
Office of Tank Tester Licensing

Enclosures (2)

1. Summary of Training Requirements for Underground Storage Tank Professionals
2. The Stand Alone System, A Self Structural Retrofit for USTs, (Version 1.2, November 21, 2013)[1]

cc: Julie Osborn, Attorney III
Office of Chief Counsel
State Water Resources Control Board

[1] "The Stand Alone System, A Self Structural Retrofit for USTs" (Version 1.2, November 21, 2013) reference installation manual has information that is confidential and/or privileged. Arrangements have been made for Tank Tech Inc. to supply this manual to the permitting UPA so that they may track the process of the installation, schedule site visits to coincide with the I-SATS listed "primary events," and for permitting purposes. It is at the discretion of Tank Tech Inc. to provide this document to all others.

Summary[1] of Training Requirements for Underground Storage Tank (UST) Professionals

(California Code of Regulations, Title 23, Chapter 16)

UST OWNER	CITATION
New Requirements: Submit a signed statement to the local agency by January 1, 2005, which includes[2]: ▪ Owner understands and is in compliance with all applicable UST requirements. ▪ Owner notifies the local agency of the Designated UST Operator for each facility owned.	§2715(a)
DESIGNATED UST OPERATOR	
New Requirements: ▪ Possess a current "**California** UST System Operator" certification issued by the International Code Council (ICC) by January 1, 2005. Certification must be renewed every 24 months. ▪ Provide annual on-the-job training for facility employee(s). Initial training required by July 1, 2005. Facility employees hired on or after July 1, 2005 must complete initial training within 30 days of the date of hire. ▪ Perform monthly visual inspections and record results on an inspection report, which must be provided to the owner/operator.	§2715(b) §2715(f) §2715(c)&(d)
UST SERVICE TECHNICIAN	
Secondary Containment Testing Existing Requirement: ▪ Possess a current Tank Testers License or appropriate Contractors State License Board (CSLB) license[3]. New Requirements: ▪ Obtain training and certification through the developer of the testing equipment or test method being used, or through the manufacturer of the secondary containment component being tested. Recertification is required at the time interval recommended by the manufacturer, or every 36 months, whichever is shorter. ▪ Possess or work under the direct and personal supervision of an individual physically present at the work site who possesses a current "**California** UST Service Technician" certification issued by the ICC by July 1, 2005[4]. Certification must be renewed every 24 months. **Annual Monitoring Equipment Certification** Existing Requirements: ▪ Possess a current Tank Testers License or appropriate CSLB license. ▪ Obtain training and certification from the monitoring equipment manufacturer and be recertified at the time interval recommended by the manufacturer, or every 36 months, whichever is shorter. New Requirement: ▪ Possess or work under the direct and personal supervision of an individual physically present at the work site who possesses a current "**California** UST Service Technician" certification issued by the ICC by July 1, 2005[4]. Certification must be renewed every 24 months.	§2637(d) §2715(i)(2)&(3) §2715(i)(4) §2638(b) §2715(i)(2)&(3) §2715(i)(4)

[1] This is a **summary** table and does not present comprehensive information on the training requirements. Please refer to Title 23, California Code of Regulations for detailed information on the training requirements for UST professionals. A copy of the UST regulations is available online at: www.swrcb.ca.gov/ust.

[2] The owner must inform the local agency of any change of designated UST operator(s) no later than 30 days after the change.

[3] A Tank Tester License must be held by the individual performing the work. A CSLB license may be held by either the employer or the individual performing the work.

[4] If the California UST Service Technician exam is not available by July 1, 2004, this requirement will become effective 12 months after the date the exam is available.

UST INSTALLER	CITATION
Existing Requirements: ▪ Possess the appropriate current CSLB license[3]. ▪ Obtain or work under the direct and personal supervision of an individual physically present at the work site that has obtained a certificate(s) of training from the manufacturer(s) of the UST system component(s) being installed. Recertification is required at the time interval recommended by the manufacturer, or every 36 months, whichever is shorter. New Requirement: ▪ Possess or work under the direct and personal supervision of an individual physically present at the work site who possesses a current "UST Installation/Retrofitting" certification issued by the ICC by January 1, 2005. Certification must be renewed every 24 months.	§2715(g) §2715(h)(1) §2715(h)(2)
UST INSPECTOR	
New Requirements: ▪ Possess a current ICC "**California** UST Inspector" certification by September 1, 2005[5]. Certification must be renewed every 24 months, by either passing the "ICC **California** UST Inspector" exam or satisfying equivalent criteria as approved by the State Water Resources Control Board UST Program Manager. ▪ UST inspectors hired on or after September 1, 2005 must possess a current ICC "California UST Inspector" certification within 180 days from the date of hire.	§2715(j)(1)&(2) §2715(j)(1)
CATHODIC PROTECTION TESTER	
New Requirement: ▪ Possess a current certificate from the National Association of Corrosion Engineers (NACE) or the ICC, demonstrating education and experience in soil resistively, stray current, structure-to-soil potential, and component electrical isolation measurements of buried or submerged metallic piping and UST systems. NACE requires recertification every 3 years; ICC requires recertification every 2 years.	§2611
CORROSION SPECIALIST	
Existing Requirement: ▪ Possess a current certificate from NACE as a corrosion specialist, or be a registered professional engineer with a current certificate or license requiring education and experience in corrosion control of buried or submerged metallic piping and UST systems.	§2611

[5] If the California UST Inspector exam is not available by September 1, 2004, this requirement will become effective 12 months after the date the exam is available.