



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

April 16, 2013

Mr. Charles Liebal
OPW Fueling Containment Systems
3250 Highway 70 Business West
Smithfield, NC 27577

Dear Mr. Liebal:

Evaluation of Stage I Vapor Recovery Components, OPW 71SO-4XXCT Series of Testable Overfill Prevention Valves

As you know, Assembly Bill 2955 (Statutes 2004, Chapter 649) added Health and Safety Code (H&SC), Chapter 6.7, Section 25290.1.2(a). This addition 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.

The State Water Board has received an information packet from you detailing a proposed modification to the current OPW 71SO series of overfill prevention valves. The proposed modification would allow the overfill prevention valve to be tested in place in lieu of removing it from the UST for the purpose of testing. The proposed modification has been reviewed by a California Registered Professional Engineer, as indicated in the enclosed signed statement dated March 1, 2013. Based on this signed statement and the information you provided, we have found no evidence that the 71SO-4XXCT series of testable overfill prevention valves conflicts with H&SC, Chapter 6.7.

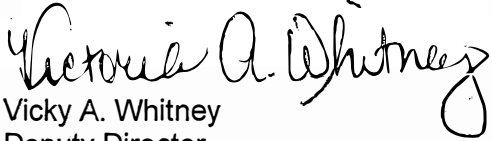
This determination assumes the OPW Phase I EVR System is installed and maintained in accordance with the most recent ARB Executive Order and manufacturer's instructions. Pursuant to H&SC, Chapter 6.7, Section 25290.1.2(a) the State Water Board certifies that, to the best of its knowledge, the inclusion of 71SO-4XXCT series to the OPW Phase I EVR System as outlined in the April 10, 2007 letter meets the requirements of H&SC, Chapter 6.7.

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE OFFICER

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If you have questions regarding this letter, please contact Ms. Laura Fisher at 916-341-5870, or by email at lfisher@waterboards.ca.gov.

Sincerely,



Vicky A. Whitney
Deputy Director
Division of Water Quality

Enclosures (2): Third Party Review and Approval of OPW 71SO Vapor Tight, Overfill Prevention Valve with Test Capability

OPW 71SO-4XXCT Series Component Cut Sheets