
State Water Resources Control Board

JAN 10 2012

Ms. Erin Faessler
Vapor Systems Technologies, Inc.
650 Pleasant Valley Drive
Springboro, Ohio 45066

Dear Ms. Faessler:

EVALUATION OF THE VST GREEN MACHINE FOR USE WITH VST BALANCE EVR DISPENSING HARDWARE

As you know, Assembly Bill 2955 (Statutes 2004, Chapter 649) added section 25290.1(a) to Chapter 6.7 of the Health and Safety Code (H&SC). This section requires the Air Resources Board (ARB) and the 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 an information package regarding the VST Green Machine vapor processing unit which will be used in conjunction with ARB approved VST balance EVR dispensing hardware previously approved under ARB Executive Orders VR-203, VR-204 and VR-205. The vapor processor's purpose is to provide active vapor pressure management by capturing and processing excess vapors.

The design, construction, installation, and operation of the VST Green Machine used in conjunction with the VST balance EVR dispensing hardware has 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 VST Green Machine conflicts with H&SC Chapter 6.7.

UST owners who intend to install this system in California should be aware that:

- For systems installed prior to July 1, 2003, tank vent lines are excluded from the statutory definition of "underground storage tank" if they are designed to prevent, and do not hold, standing fluid.¹ Based on the information provided, the VST Green Machine does not increase the likelihood of liquid-phase product accumulating in the tank vent lines. Because the information indicated that the VST Green Machine does not increase the likelihood of liquid phase product, tank vent lines that are currently excluded

¹ California Health and Safety Code, Chapter 6.7, section 25281.5(a)(4).

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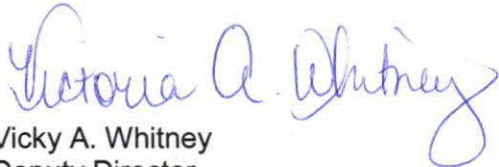
from the definition of "underground storage tank" may continue to be excluded once the VST Green Machine with the VST balance EVR dispensing hardware has been installed.

- California regulations² 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). Where installation of the VST Green Machine involves connection to monitoring equipment used to satisfy the monitoring requirements for the UST system, all work must be performed by a qualified service technician meeting the requirements of section 2715(i).
- Permitting and inspection requirements vary among the local regulatory agencies who implement the State Water Board's UST Program. Depending on the jurisdiction, the local agency may require the UST owner/operator to obtain a permit prior to installation and/or conduct functional testing of the monitoring equipment after the VST Green Machine has been installed.

Pursuant to H&SC section 25290.1.2(a) the State Water Board certifies that, to the best of its knowledge, the VST Green Machine used in conjunction with VST balance EVR dispensing hardware meets the requirements of H&SC Chapter 6.7. This determination assumes the EVR system is installed in accordance with applicable ARB Executive Orders, manufacturer, instructions, and the limitations outlined in this letter.

If you have questions regarding this letter, please contact 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): Certification Statement for the VST Green Machine
Supplemental Certification Statement

² California Code of Regulations, Title 23, sections 2611 and 2638.