



State Water Resources Control Board



Linda S. Adams
Acting Secretary for
Environmental Protection

Division of Water Quality
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Edmund G. Brown Jr.
Governor

MAR 25 2011

Mr. John Fecteau, PMP
Veeder-Root
125 Powder Frost Drive
Simsbury, CT 06070

Dear Mr. Fecteau:

EVALUATION TO ADD A LIQUID/VAPOR CONDENSATE TRAP TO THE VST
BALANCE ENHANCED VAPOR RECOVERY (EVR) SYSTEMS CALIFORNIA AIR
RESOURCES BOARD (ARB) EXECUTIVE ORDERS VR-203 and VR-204

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 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 EVR requirements also meets the underground storage tank (UST) statutory requirements.

The addition of a liquid/vapor condensate trap to the VST Balance EVR Systems has been reviewed by a California Professional Engineer, as indicated by the enclosed signed statement. Based on this signed statement and the information that you have provided, we have found no evidence that the addition of a liquid/vapor condensate trap conflicts with H&SC Chapter 6.7.

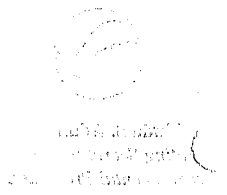
Please note that all conditions issued in the State Water Board determinations associated with Executive Orders VR-203 and VR-204 applies to this determination. Also, liquid/vapor condensate traps are part of the UST system and therefore required to meet the design, construction, operation, and maintenance requirements set forth at the time of the UST installation.

Pursuant to H&SC section 25290.1.2(a) the State Water Board certifies that, to the best of its knowledge, the addition of a liquid/vapor condensate trap to the VST Balance EVR Systems meet the requirements of the H&SC Chapter 6.7. This determination assumes that the liquid/vapor condensate trap and the VST Balance EVR Systems are installed in accordance with applicable ARB Executive Orders, manufacturer's instructions, and any limitations outlined in this letter.

California Environmental Protection Agency

Mr. John Fecteau

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If you have any questions regarding this letter please contact Ms. Laura Fisher at (916) 341-5870 (lfisher@waterboards.ca.gov).

Sincerely,

Victoria A. Whitney
Deputy Director
Division of Water Quality

Enclosure

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

California Environmental Protection Agency

Appendix

Certification Statement for the addition of Installation of Vapor Pots to VST, Phase II Enhanced Vapor Recovery(EVR) Systems, Executive Orders VR-203K- and VR-204-K¹

Based on a careful review and analysis, I hereby certify that the installation of a **Liquid Condensate Trap in the VST Phase II EVR System**, which is under consideration for California Air Resources Board (ARB) certification, meets the requirements of Chapter 6.7 of the California Health and Safety Code (the State Water Resources Control Board's underground storage tank requirements, including enhanced leak detection and continuous vacuum, pressure, or hydrostatic monitoring.)²

The VST Phase II EVR System warrantee is valid as long as the system is installed and operated according to manufacturer's instructions and in a manner that does not exceed the limitations (e.g. tank capacity, fueling points, throughput, etc) described below.

Limitations:

The Liquid Condensate Trap must be installed operated and maintained per Executive Order VR-203-K, or VR-204-K, Liquid Condensate Trap Installation, Operation, and Maintenance Manual, Exhibit 15 for VR-203-K and Exhibit 18 for VR-204K.

Aaron M. Newman 3/17/11
Signed by Date
(California Professional Engineer)

Aaron M. Newman P.E.
Printed Name (California Professional Engineer)

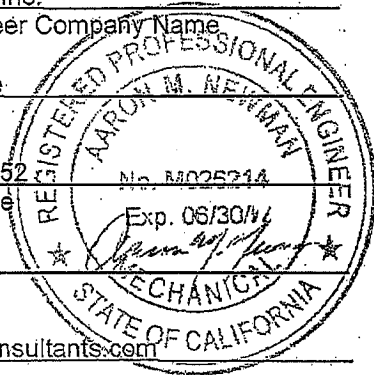
DCV Consultants, Inc.
Professional Engineer Company Name

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Phone Number

anewman@dcvconsultants.com
Email



John Fecteau 3/22/11
Signed by Date
(Company Representative)

John Fecteau
Printed Name (Company Representative)

VEEDER-ROOT
Equipment Manufacturer Name

125 POWDER FOREST DRIVE
Mailing Address

SIMS BURY, CT 06070
City, State, Zip Code

860 651 2882
Phone Number

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Email

¹This certification statement is part of the guidelines developed by the California Air Resources Board (ARB) and State Water Resources Control Board (State Water Board) to implement provisions of Assembly Bill 2955 (Statutes 2004, Chapter 649; McCarthy).

²This certification is based on the presumption that the **VST, Enhanced Vapor Recovery (EVR) System** is constructed, installed, maintained, and operated in accordance with all applicable requirements of Chapter 6.7 of California Health and Safety Code and Chapter 16 of California Code of Regulations.