



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 1-3700 Series Spill Containers

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 OPW executive order VR-102. The proposed modification states the only difference between OPW 1-3100 series of products and 1-3700 series of products is the cover arrangement and outer guard. This new 1-3700 series uses a steel cover instead of an iron cover and the outer guard is not included as the existing spill container performs this function. In addition, the proposed modification is intended to retrofit into existing 500L and 700L spill containers. You have also stated in your information packet that, "ARB has evaluated this new product series and concluded that no field testing will be required due to the similarities with the 1-3100 series." 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 supporting information you provided, the State Water Board has found no evidence that the OPW 1-3700 Series Spill Containers 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 VR-102 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 1-3700 series spill containers to the OPW Phase I EVR System as outlined in the January 5, 2009 and August 31, 2005 letters 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 (8): Request to Add Stage I Vapor Recovery Components, 1-3700 Series

Third Party Review and Approval of OPW Series 1-3700 Double Wall Retrofit
Spill Containment

OPW 1-3700 Series Component Cut Sheets

OPW 1-3700 Series Product List

OPW List of Changes Between 1-3100 Series and 1-3700 Series Products

OPW Representative Component Drawing

OPW Representative Picture of 1-3700 Series

OPW Double Wall EDGE Field Replacement Kits for 500L and 700L Series Spill
Containers