



Air Resources Board



Matthew Rodriquez
Secretary for
Environmental Protection

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Edmund G. Brown Jr.
Governor

August 26, 2014

To All Interested Parties:

Air Resources Board (ARB) staff has recently received a series of inquiries from local air pollution control district representatives, aboveground gasoline storage tank (AST) owners/operators, and vapor recovery equipment installers regarding the use of integral spill containers on protected ASTs which are not listed in ARB Executive Orders (EO) VR-301 or EO VR-302. As currently written, external spill containers listed in Phase I EVR EOs VR-401 and VR-402 are required on all ASTs regardless of configuration. However, when an external spill container is installed within an existing integral spill container, modifications are often required to the integral spill container cover and a redundant configuration results. In order to eliminate this redundancy, "Letters of Intent" were previously issued to ConVault, Containment Solutions, Inc., and Modern Custom Fabrication, Inc., indicating ARB staff will include integral spill containers of the ConVault AST, Hoover Vault AST, and SuperVault MH Series AST, respectively, as acceptable alternatives to the external spill containers required in EOs VR-401 and VR-402.

Based upon engineering evaluations of the ConVault AST, the Hoover Vault AST, and the SuperVault MH Series AST, as well as test data from the standing loss control certification process (per Section 14 of CP-206, *Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities Using Aboveground Storage Tanks*), ARB staff has determined that integral spill containers for certain existing protected tanks are suitable alternatives for the spill containers listed in EOs VR-401 and VR-402.

With regard to existing protected AST with integral spill containers that are not listed in EOs VR-301 and VR-302, ARB staff has made two key findings which will alleviate the need to install the external spill container listed in EOs VR-401 and VR-402. First, if an integral spill container does not have a drain valve, then it is not necessary to install the external spill container. Secondly, if an integral spill container does contain a drain valve that can be removed and replaced with an industry standard national pipe thread (NPT) plug, and the installation can successfully pass leak integrity testing, then that integral spill container may also be utilized in place of an external spill container. The NPT plug must be made of a material that is compatible with gasoline and will require

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the use of a gasoline compatible pipe sealant. If the drain valve opening is not NPT, ARB staff will need to conduct an evaluation to determine proper plug specifications and procedure.

Based on these findings, ARB staff has determined that protected ASTs with integral spill containers that either do not possess drain valves, or that possess drain valves that can be removed and replaced with a NPT threaded drain plug, are suitable for use with the Phase I EVR systems described in EOs VR-401 and VR-402. Furthermore, ARB staff has determined that such protected ASTs do not require the use of external spill containers manufactured by OPW or Morrison Brothers as indicated in EOs VR-401 and VR-402, respectively.

In the next revision of EOs VR-401 and VR-402, specifications and line drawings pertaining to the non-certified protected ASTs with integral spill container configurations will be added to the appropriate Exhibits. While ARB staff completes the EO review process, owners/operators and installation contractors who wish to utilize the non-certified protected AST integral spill containers can follow the assembly drawing and installation instruction provided as enclosures to this letter. Please note that this letter may be utilized until the EO revision process is complete.

If you have questions, please contact Donielle Jackson at (916) 445-9308, or via email at dljackso@arb.ca.gov, or Lou Dinkler at (916) 324-9487, or via email at ldinkler@arb.ca.gov.

Sincerely,



George Lew, Chief
Engineering and Certification Branch
Monitoring and Laboratory Division

Enclosures

- Figure 1: Typical "Product Side" Assembly Drawing for Protected AST with Integral Spill Container with Drain Plug
- Figure 2: Installation Instructions for Typical Protected AST with Integral Spill Container Drain Plug

cc: See next page.

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cc: Jon Adams
San Diego County Air Pollution Control District

John Cadrett
San Joaquin Valley Air Pollution Control District

Kathi Crump
San Joaquin Valley Air Pollution Control District

Bob McLaughlin
Butte County Air Quality Management District

Danny Luong
South Coast Air Quality Management District

John Marvin
Bay Area Air Quality Management District

Randy Matsuyama
South Coast Air Quality Management District

Kevin Tokunaga
Glenn County Air Pollution Control District

James Parsegian
Department of Forestry and Fire Protection

Amit Gupta
Department of Industrial Relations

John Roach
Department of Food and Agriculture

Mike Lattner
Morrison Brothers

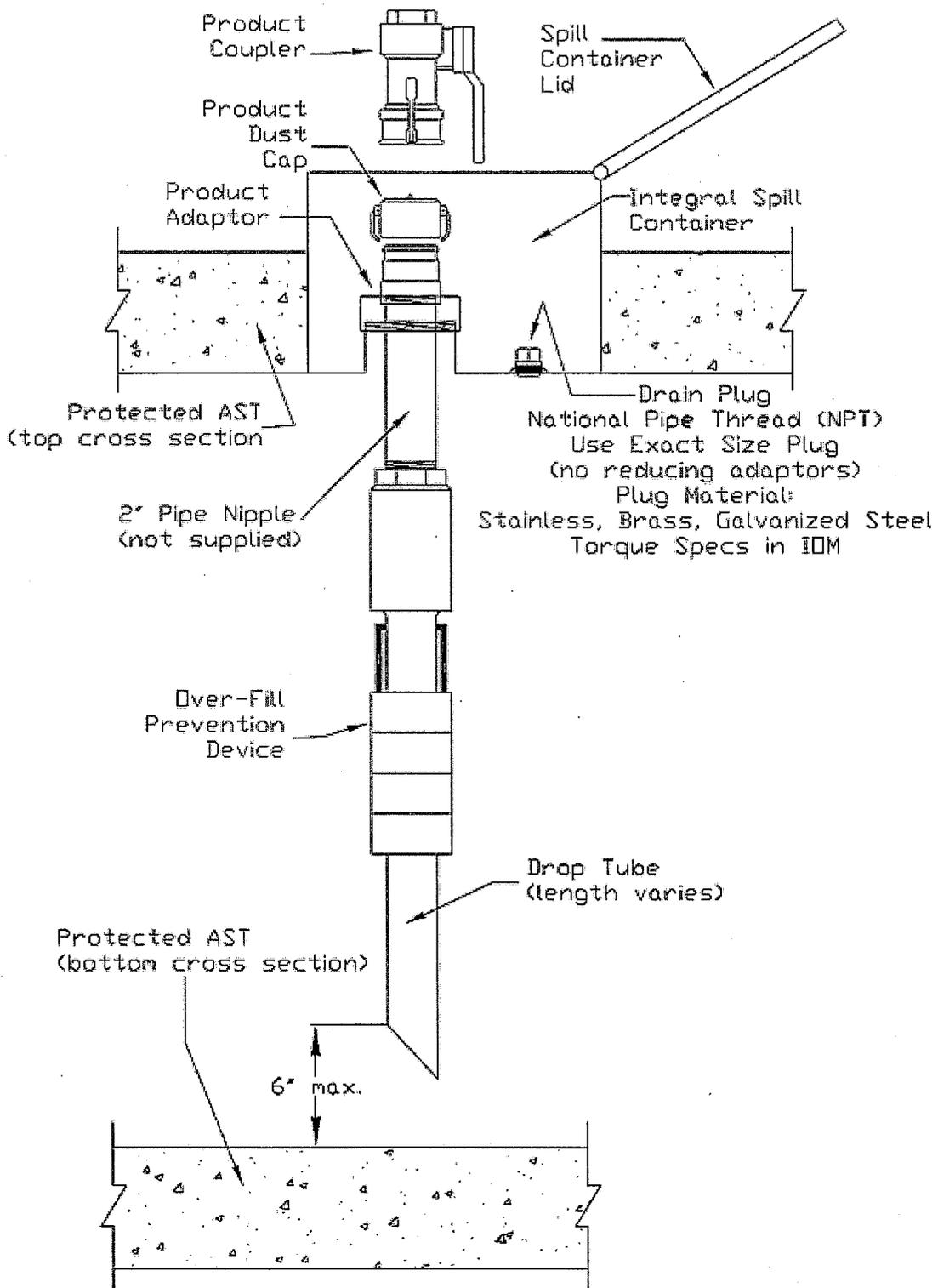
Douglas Olenick
OPW Fueling Components

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Lou Dinkler, Manager
Engineering Evaluation Section
Monitoring and Laboratory Division

Donielle Jackson
Monitoring and Laboratory Division

Figure 1: Typical "Product Side" Assembly Drawing for Protected AST with Integral Spill Container with Drain Plug



**Figure 2: Installation Instructions for Typical AST with
Integral Spill Container with Drain Plug**

- Install all permanent piping and fittings using suitable thread sealant material.
- Place the appropriately sized drain plug in the NPT opening in the spill container.
- Hand tighten the drain plug.
- Apply a torque of 25 to 30 foot pounds to tighten the plug.
- All unused tank openings must be properly sealed using threaded pipe plugs, flanges or caps using suitable thread sealant material.
- Pressure test the tank using three inches water column pressure and soap solution (presence of bubbles indicates a leak) to ensure the drain plug is leak tight.
- Do not weld on the tank, modify, or penetrate the tank structure in any way without the express written permission of the tank manufacturer.