



# Air Resources Board



Mary D. Nichols, Chairman

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Sacramento, California 95812 • www.arb.ca.gov

Matthew Rodriguez  
Secretary for  
Environmental Protection

Edmund G. Brown Jr.  
Governor

November 17, 2011

**MAILED**  
12-5-11  
Cj

#11-02

Mr. David Dooley  
Containment Solutions, Incorporated  
12 E. Baltimore St, Suite F  
Taneytown, Maryland 21787

Dear Mr. Dooley:

Per your email correspondence dated October 12, 2011, Containment Solutions Incorporated (CSI) is requesting an amendment of Air Resources Board (ARB) Executive Orders (EO) VR-301-C and VR-302-C; Standing Loss Control Vapor Recovery Systems for Existing and New Aboveground Storage Tanks (AST) Installations to include additional model number designations for CSI's "Hoover Vault" ASTs. These amendments are necessary because CSI did not initially disclose that a different AST model numbering system was used for ASTs manufactured between 1993 and 2002. CSI has indicated that ASTs manufactured in those years are identical to ASTS certified by Executive Orders VR-301-C and VR-302-C.

On June 15, 2011, ARB certified CSI's "Hoover Vault" AST Standing Loss Control Vapor Recovery System via Executive Orders VR-301-C and VR-302-C. According to Exhibit 1, the CSI "Hoover Vault" model numbers are listed as V4AAXXXVXXXX and V6AAXXXVXXXX, where the "4" or "6" in the second position indicate four inches or six inches of insulation between the primary and secondary walls, and where "X" represents a numeric value ranging from 0 to 9. Per ARB Approval Letter #11-01, issued on September 29, 2011, ARB staff is planning to correct the description of the 6th through 8th digits, as well as the 10th (See Table 1) during the next revision of the Executive Orders.

This approval letter (#11-02) seeks to include additional model numbers associated with existing CSI "Hoover Vault" AST. According to documentation recently submitted by CSI, CSI made a decision in July of 1999, to change the model number designation of "Hoover Vault" ASTs. It took approximately two years to fully implement this change. Prior to 2001, CSI manufactured "Hoover Vault" ASTs under model numbers LDPXXX, LDPXXXX, and LDPXXXXX, where "X" represents numbers 0 to 9, indicating the size, in gallons, of AST. The tanks bearing the LDPXXX, XXXX, and XXXXX model numbers which were manufactured between 1993 and 2002 are identical (in terms of design, materials utilized, and specifications) as those with model numbers V4AAXXXVXXXX and V6AAXXXVXXXX. Please see Table 1 for further explanation.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

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These additional model numbers will be added to the next revision of EOs VR-301 and VR-302 (Revision D). In the interim, this approval letter shall be used to indicate that CSI "Hoover Vault." AST with the above model numbers have been certified for standing loss control applications.

If you have questions or need further information, please contact Ms. Donielle Jackson at (916) 445-9308 or via email at [dliackso@arb.ca.gov](mailto:dliackso@arb.ca.gov), or Mr. Lou Dinkler at (916) 324-9487 or via email at [ldinkler@arb.ca.gov](mailto:ldinkler@arb.ca.gov).

Sincerely

A handwritten signature in black ink, appearing to read 'Alberto Ayala', with a long horizontal flourish extending to the right.

Alberto Ayala Ph.D., M.S.E.  
Chief, Monitoring and Laboratory Division

cc: See next page.

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cc: Randy Smith  
San Diego County Air Pollution Control District

Diana Williams  
San Diego County Air Pollution Control District

John Marvin  
Bay Area Air Quality Management District

Danny Luong  
South Coast Air Quality Management District

Dillon Collins  
San Joaquin Valley Air Pollution Control District

Jim Swaney  
San Joaquin Valley Air Pollution Control District

Irene Beltran  
Mojave Desert Air Quality Management District

Laura Fisher  
State Water Resources Control Board

James Parsegian  
Department of Forest and Fire Protection

Norman Ingram  
Department of Food and Agriculture

Amit Gupta  
Department of Industrial Relations

Mike Wygant  
North County Transit District

**Table 1: Changes to CSI "Hoover Vault" AST Model Number Designations Listed in Exhibit 1 of ARB Executive Orders VR-301 and VR-302**

<b>Wall Thickness</b>	Four (4) Inches of Insulation (lightweight concrete) Between Primary and Secondary Walls.	Six (6) Inches of Insulation (lightweight concrete) Between Primary and Secondary Walls.
<b>Current Model Number</b>	V4AAXXXVXXXX	V6AAXXXVXXXX
	Where "X" equals numbers from 0 to 9.	
<b>Corrected Model Number Per Advisory #11-1</b>	V4AAXXX <sup>1</sup> VX <sup>2</sup> XXX	V6AAXXX <sup>1</sup> VX <sup>2</sup> XXX
	where "X" equals numbers from 0 to 9, except: <sup>1</sup> In the 8th digit location if the tank size is 1,000 gallons or greater. In that instance "X" will either be a "C" or an "M" roman numeral representing a value of 100 or 1,000; and <sup>2</sup> In the 10th digit location, where "X" will either be an "S" for standard or an "8" for modified.	
<b>Corrected Model Number Per Advisory #11-2</b>	LDPXXX, LDPXXXX, LDPXXXXX Note: all LDPXXX models are equipped with four (4) inches of insulation (lightweight concrete) between the primary and secondary walls.	
	Where "X" equals numbers from 0 to 9 and denotes the size of the AST in gallons (12,000 gallons or less); and for ASTs manufactured after 1993 and before 2002.	
<b>Examples</b>	V4AAX15CVSXXX 1,500 gallon, standard tank	V6AAX250VSXXX 250 gallon, standard tank
	V4AAX05MV8XXX 5,000 gallon, modified tank	V6AAX550V8XXX 550 gallon, modified tank
	V4AAX12MVSXXX 12,000 gallon, standard tank	V6AAX900VSXXX 900 gallon, standard tank
	LDP550 = 550 gallons	
	LDP12000 = 12,000 gallons	