



Winston H. Hickox
Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman

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Gray Davis
Governor

April 24, 2002

#02-05

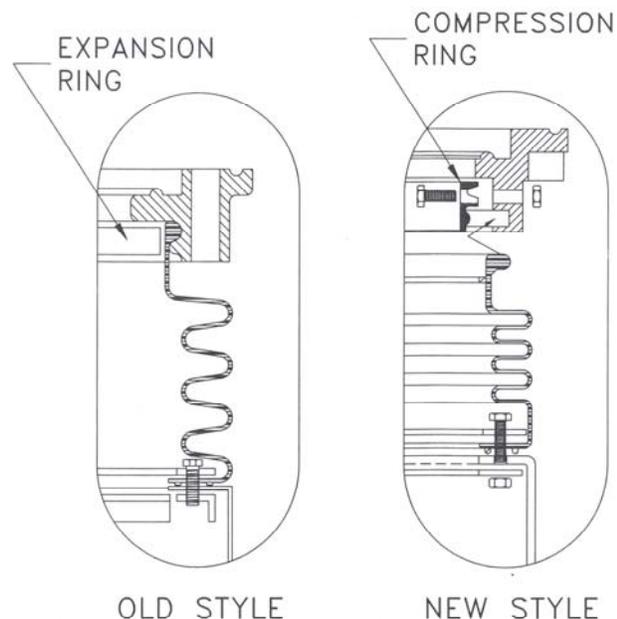
Mr. Toby Argandona
President
CNI Manufacturing
15627 Arrow Highway
Irwindale, California 91706

Dear Mr. Argandona:

Thank you for your letter dated March 25, 2002 requesting California Air Resources Board (CARB) approval of a modification to a spill container designed for use with Phase I vapor recovery systems installed in secondary containment sumps. The modification involves a new method of securing the upper section of the spill container to the lid ring, which is bolted to the manhole cover. The upper section of the spill container consists of a flexible bellows made of rubber. The previous design used an expansion ring with a single adjustment screw to secure the bellows to the manhole ring. The new design uses a three-piece compression ring and six bolts to secure the bellows to the manhole ring.

CARB has reviewed the drawings and conducted visual inspections of an installation and has determined that the drain valve has not been modified. CARB has also inspected the new spill container as installed to verify that the new design does not adversely affect the vapor adaptor or any other vapor recovery component. Since the requested modification you described seems to relate only to the issue of standing fuel, the modification is approved under the following conditions:

- 1) The modification does not impact vapor recovery system and is approved under CP-201 section 19 only as a replacement part that does not meet the requirements of CP-201 section 3 (EVR for phase I systems).



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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- 2) The modified spill container is certified as a replacement part only through April 2005. The modification is approved for non-EVR replacements/retrofits only.
- 3) The spill container is not certified for use in new installations of Phase I EVR systems.
- 4) CARB approval of the modification does not constitute approval for the Water Resources Control Board or approval as required by any other agency.

Please contact Shahla Farahnak of the State Water Resources Control Board at (916) 341-5668 or by e-mail at farahnas@cwpswrcb.ca.gov for review and approval of the modification under title 23, California Code of Regulations, section 2635 and other applicable regulations of the Water Board.

If you have further questions or wish to discuss this matter, please contact Lou Dinkler at (916) 445-9335 or by e-mail at ldinkler@arb.ca.gov or Laura McKinney at (916) 327-0900 or by e-mail at lmckinne@arb.ca.gov.

Sincerely,



William V. Loscutt, Chief
Monitoring and Laboratory Division

cc: Rosa Salcedo, San Diego County APCD
Shahla Farahnak, State Water Resources Control Board
Jim Swaney, San Joaquin Valley APCD