Air Resources Board

Mary D. Nichols, Chairman
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Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

January 3, 2014

Mr. Dave Dooley
Products Manager
Containment Solutions, Inc.
12 E. Baltimore Street, Suite F
Taneytown, Maryland 21787

Dear Mr. Dooley:

On September 16, 2013, Containment Solutions Incorporated (CSI) responded to an email inquiry from ARB staff regarding the installation of Phase I Enhanced Vapor Recovery (EVR) systems on their "Hoover Vault" protected aboveground storage tanks (AST) equipped with integral spill containers. CSI Hoover Vault ASTs are currently certified by ARB under Executive Orders VR-301, *Standing Loss Control for Existing Installations*, and VR-302, *Standing Loss Control for New Installations*.

As part of 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 required CSI to establish an operational "test site" at which several Hoover Vault ASTs were evaluated. On October 8, 2010, ARB staff completed a series of 3 30-day certification tests on several Hoover Vault tanks, each equipped with an integral spill container and drain plug. During these evaluations the drain plug successfully passed leak integrity and durability testing.

Based on previously submitted application materials and the results of the above mentioned certification testing, ARB staff has determined that CSI Hoover Vault ASTs equipped with integral spill containers and drain plugs are suitable for use with the Phase I EVR systems described in Executive Orders VR-401 and VR-402. Furthermore, ARB staff has determined that CSI Hoover Vault ASTs equipped with integral spill containers do not require the use of external spill containers manufactured by OPW or Morrison Brothers as indicated in Executive Orders VR-401 and VR-402, respectively.

In the next revision of Executive Orders VR-401 and VR-402, specifications, images, line drawings, and performance standards pertaining to the CSI Hoover Vault integral spill container configurations will be added to the appropriate Exhibits. The ARB

approved Installation, Operation, and Maintenance Manual will also be updated to include the procedure to install the "Product Side" portion of the Phase I system within the various Hoover Vault integral spill container configurations.

While ARB completes the Executive Order review process, Hoover Vault AST owners/operators and installation contractors who wish to utilize the CSI Hoover Vault 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 Executive Order 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

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

Enclosures

- Figure 1: Typical "Product Side" Assembly Drawing for CSI Hoover Vault Aboveground Storage Tanks with Integral Spill Container with Drain Plug
- Figure 2: Installation Instructions for CSI Hoover Vault Aboveground Storage Tank with Integral Spill Container Drain Plug

cc: See next page.

cc: Jim Swaney
San Joaquin Valley Air Pollution Control District

Danny Luong
South Coast Air Quality Management District

John Marvin
Bay Area Air Quality Management District

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John Roach
Department of Food and Agriculture

Mike Lattner
Morrison Brothers

Keith Simons
OPW Fueling Components

Lou Dinkler
Air Resources Board

Donielle Jackson
Air Resources Board

Figure 1: Typical "Product Side" Assembly Drawing for CSI Hoover Vault Integral Spill Container with Drain Plug

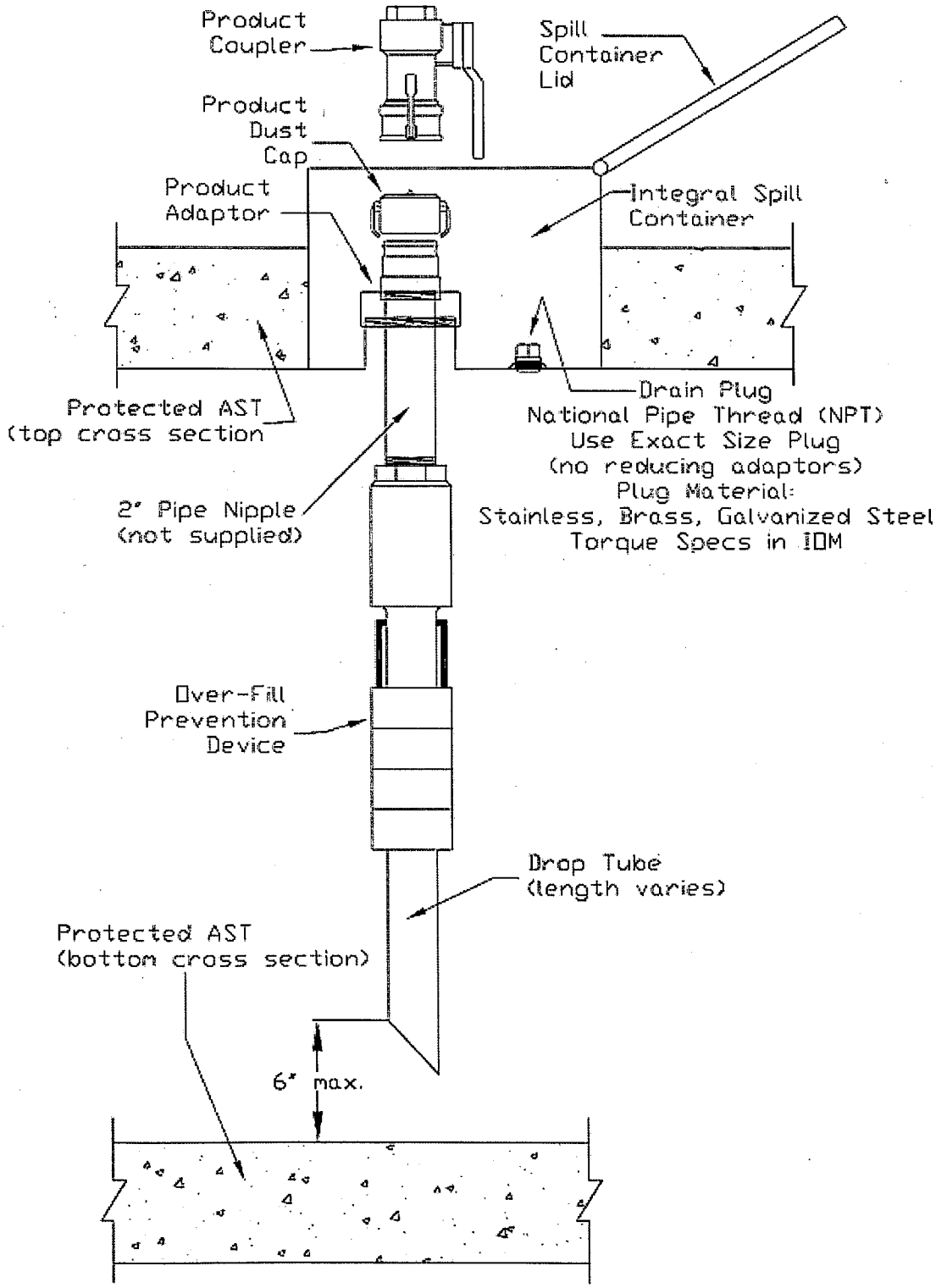

Figure 2: Installation Instructions for CSI Hoover Vault Aboveground Storage Tanks with Integral Spill Container with Drain Plug

HOOVER VAULT TANK™ INSTALLATION INSTRUCTIONS

Disclaimer:

Containment Solutions, Inc. (CSI), in accordance with all state, national and provincial codes requires testing at the jobsite by the installing contractor. This test should be accomplished after the tank has been placed at the location where it will be operating, and BEFORE any product is introduced into the tank. CSI strongly recommends that this work be performed by a trained and licensed AST installer. At a minimum, tanks should be tested to the written procedures presented below as well as applicable instructions outlined in the Petroleum Equipment Institute recommended practice RP200. The below presented guidelines do not alleviate the installer from insuring that all tanks are installed in strict accordance with NFPA 30, NFPA 30A and/or NFPA 31 codes at a minimum, in addition to all applicable state or local codes that may be more stringent.

Integral Spill Container Drain Plug

- Install all permanent piping and fittings using suitable thread sealant material.
- Place the drain plug in the 1/2 inch 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.