



Air Resources Board



Matthew Rodriguez
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

January 3, 2014

Mr. John Ekhtiar
Vice President Engineering
ConVault
4109 Zeering Road
Denair, California 95316

Dear Mr. Ekhtiar:

On July 2, 2012, ConVault submitted an application to the Air Resources Board (ARB) seeking amendment of Executive Orders VR-401, *OPW Phase I Enhanced Vapor Recovery System for Aboveground Storage Tanks*, and VR-402, *Morrison Brothers Phase I Enhanced Vapor Recovery System for Aboveground Storage Tanks*, to include ConVault integral spill containers with drain valve and with drain plug.

As required under Section 14 of CP-206, *Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities Using Aboveground Storage Tanks*, ARB staff required ConVault to establish two "test sites" at which the integral spill containers with drain valve and drain plug were subjected to certification testing.

On September 25, 2013, ARB staff completed a 180 day evaluation of the integral spill container with drain valve. The drain valve successfully passed all leak integrity and durability testing. On November 7, 2013, ARB staff completed a 30 day abbreviated evaluation of the integral spill container with drain plug. The drain plug successfully passed leak integrity and durability testing.

Based on the application materials submitted and the results of certification testing, ARB staff has determined that ConVault integral spill containers with and without drain valves are suitable for use with the Phase I Enhanced Vapor Recovery systems described in Executive Orders VR-401 and VR-402. Furthermore, ARB staff has determined ConVault aboveground storage tanks (AST) 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 ConVault integral spill

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

Mr. John Ehktiar
January 3, 2014
Page 2

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 ConVault integral spill container configurations.

While ARB completes the Executive Order review process, AST owners/operators and installation contractors who wish to utilize ConVault integral spill containers can follow the assembly drawings and installation instructions 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 Mark Watkins at (916) 650-0594 or via email at mwatkins@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 ConVault Integral Spill Container with Drain Valve
- Figure 2: Typical "Product Side" Assembly Drawing for ConVault Integral Spill Container with Drain Plug
- Figure 3: Installation Instructions for ConVault Integral Spill Container Drain Valve
- Figure 4: Installation Instructions for ConVault Integral Spill Container Drain Plug

cc: See next page.

Mr. John Ehktiar
January 3, 2014
Page 3

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

Randy Smith
San Diego County Air Pollution Control District

Randy Matsuyama
South Coast Air Quality Management District

Kevin Tokunaga
Glenn County Air Pollution District

James Parsegian
Department of Forestry and Fire Protection

Amit Gupta
Department of Industrial Relations

John Roach
Department of Food and Agriculture

Rich Erickson
Donlee Pump

Dave Harris
Donlee Pump

Mike Lattner
Morrison Brothers

Keith Simons
OPW Fueling Components

Lou Dinkler
Air Resources Board

Mr. John Ehktiar
January 3, 2014
Page 4

cc: Mark Watkins
Air Resources Board

Figure 1: Typical "Product Side" Assembly Drawing for ConVault Integral Spill Container with Drain Valve

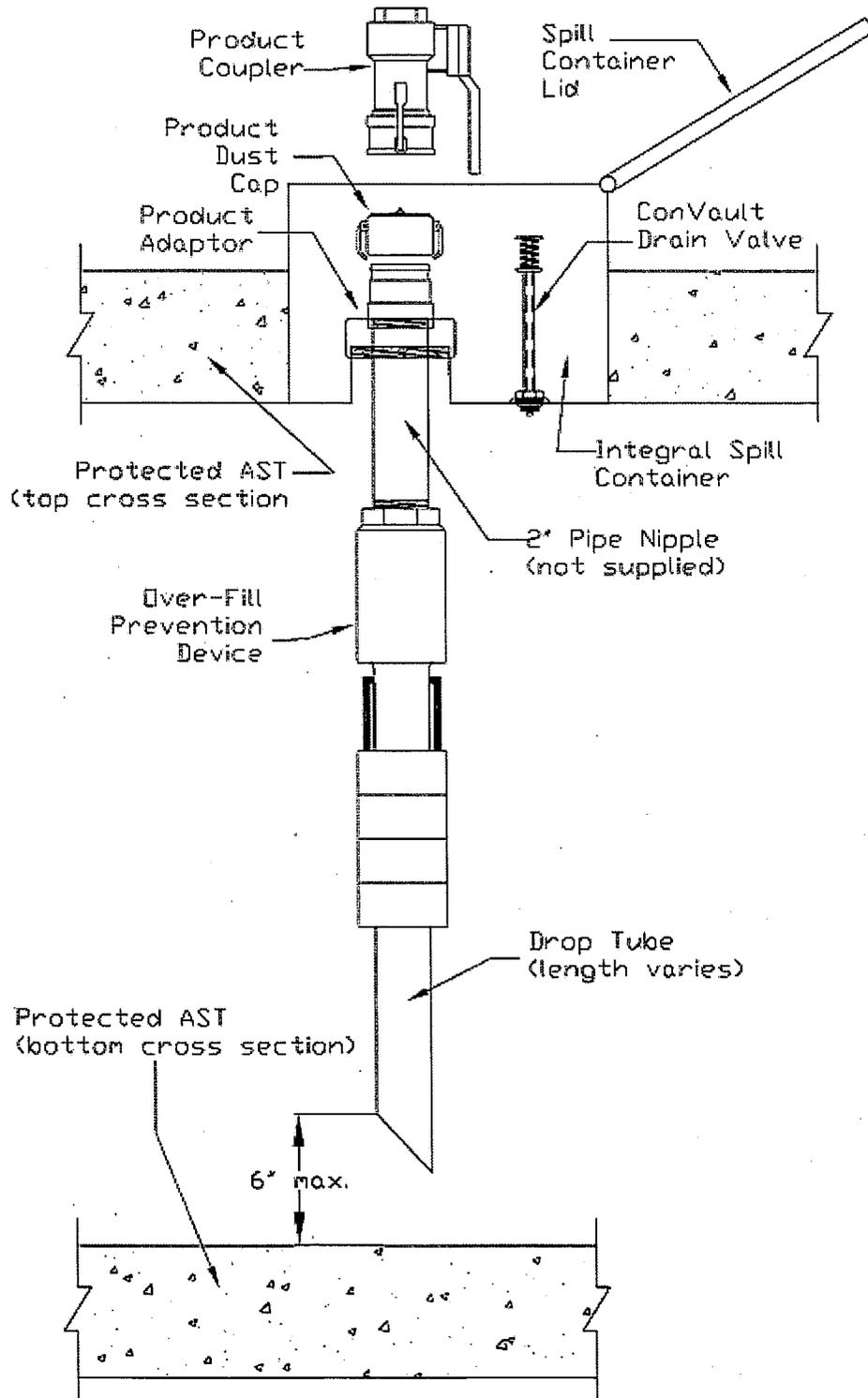


Figure 2: Typical "Product Side" Assembly Drawing for ConVault Integral Spill Container with Drain Plug

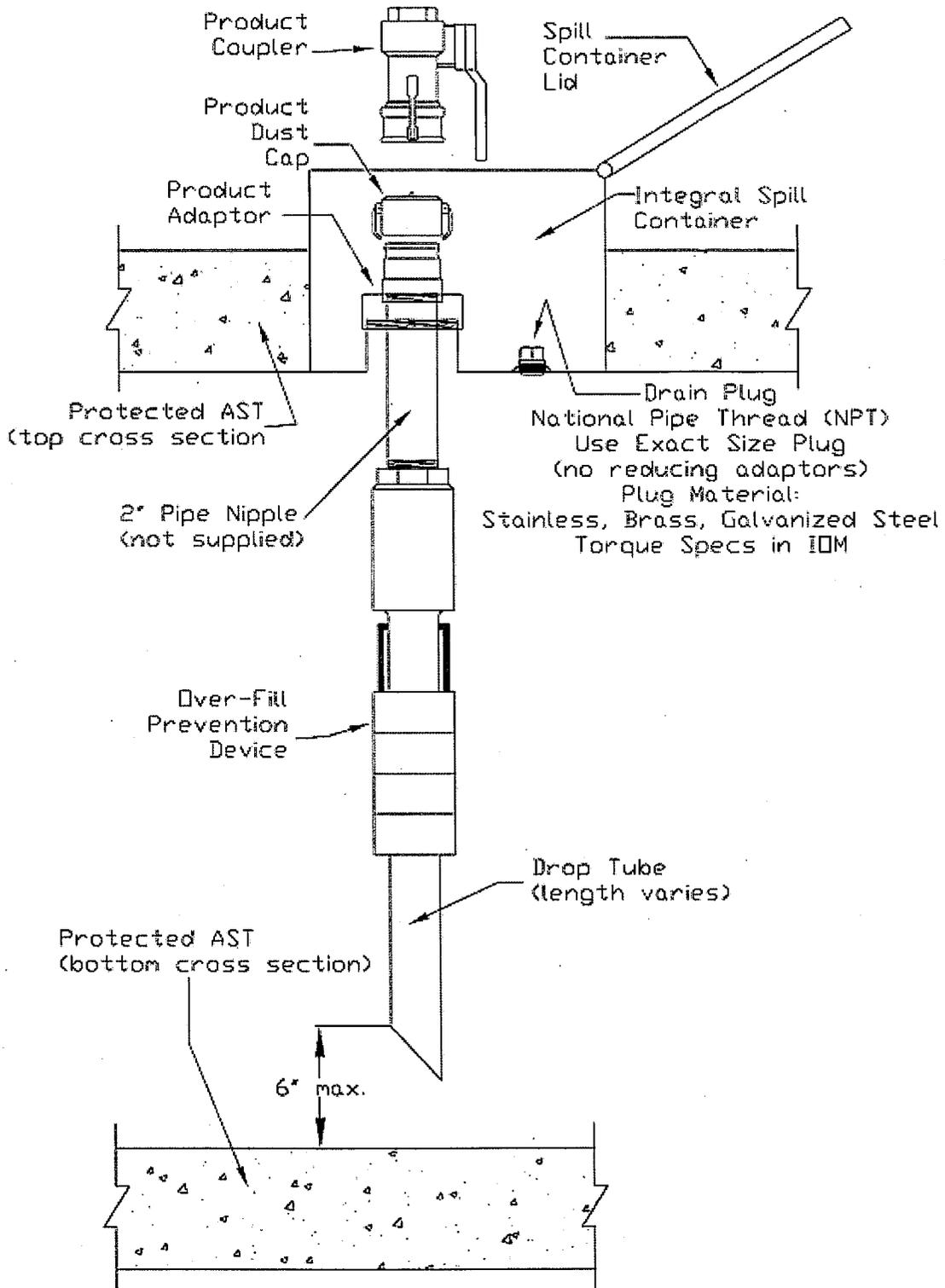


Figure 3: Installation Instructions for ConVault Integral Spill Container Drain Valve



ConVault, Inc., 4109 E. Zeering Road, Denair, CA 95316

800-222-7099, 209-632-7571

<http://www.convault.com>, info@convault.com

INSTALLATION INSTRUCTIONS CONVAULT DRAIN VALVE

1. Place an adequate amount of gasoline compatible pipe dope on the male threads of the drain valve.
2. Place the drain valve in the 1 ¼" inch NPT opening in the spill container.
3. Hand tighten the drain valve.
4. Using a 1 ¾" inch "crowsfoot" wrench, which has a center to center distance of 1 ½ inches; apply a torque of 25 to 30 foot pounds to tighten the valve.
5. Pressure test the tank using three inches water column pressure and soap solution (presence of bubbles indicates a leak) to ensure the drain valve is leak tight.

Figure 4: Installation Instructions for ConVault Integral Spill Container with Drain Plug



ConVault, Inc., 4109 E. Zeering Road, Denair, CA 95316

800-222-7099, 209-632-7571

<http://www.convault.com>, info@convault.com

Installation Instructions ConVault Drain Plug

1. Place an adequate amount of gasoline compatible pipe dope on the male threads of the drain plug.
2. Place the drain plug in the 1 ¼" inch NPT opening in the spill container.
3. Hand tighten the drain plug.
4. Using a 1 ¾" inch "crowsfoot" wrench, which has a center to center distance of 1 ½ inches; apply a torque of 25 to 30 foot pounds to tighten the plug.
5. 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.