



Linda S. Adams
Secretary for
Environmental Protection

State Water Resources Control Board

Division of Water Quality

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Arnold Schwarzenegger
Governor

OCT 23 2009

Mr. Glenn Walker
Vapor Systems Technology, Inc.
650 Pleasant Valley Drive
Springboro, Ohio 45066

Dear Mr. Walker:

EVALUATION OF VST BALANCE PHASE II ENHANCED VAPOR RECOVERY (EVR) SYSTEM FOR USE WITH THE HEALY CLEAN AIR SEPERATOR (CAS) WITHOUT IN-STATION DIAGNOSTIC (ISD) SYSTEM

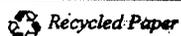
Assembly Bill 2955 (Statutes 2004, Chapter 649) added section 25290.1.2(a) to Chapter 6.7 of the Health and Safety Code (H&SC). This section requires the California Air Resources Board (ARB) and the State Water Resources Control Board (State Water Board) to certify, to the best of their knowledge and using existing resources, that equipment meeting the ARB's EVR requirements also meets the underground storage tank (UST) statutory requirements.

We have received information and a detailed description regarding the use of the VST Phase II EVR System in conjunction with the Healy CAS. The determination letter for the VST Phase II EVR System dated (November 1, 2007) and the Healy CAS (dated April 7, 2005) are enclosed.

The design, installation, and operation of the VST Balance Phase II EVR System in conjunction with the Healy CAS has been reviewed by a California Professional Engineer, as indicated by the enclosed signed statement. Based on this signed statement and the information that you have provided, we have found no evidence that the VST Phase II EVR System used in conjunction with the Healy CAS conflicts with H&SC Chapter 6.7.

Please note that all conditions issued with the VST Phase II EVR System and the Healy CAS individually, also apply to the use of the VST Phase II EVR System and Healy CAS together.

California Environmental Protection Agency

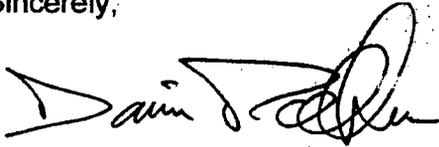


Mr. Glenn Walker

- 2 -

Pursuant to H&SC section 25290.1.2(a) the State Water Board certifies that, to the best of its knowledge, the VST Phase II EVR System in conjunction with the Healy CAS meets the requirements of the H&SC Chapter 6.7. This determination assumes that the VST Phase II EVR System and the Healy CAS are installed in accordance with applicable ARB Executive Orders, manufacturer's instructions, and any limitations outlined in this letter.

Sincerely,



Darrin Polhemus, Deputy Director
Division of Water Quality

Enclosures (3)

cc: Mr. George Lew, Chief
ARB Engineering and Certification Branch
1927 13th Street
Sacramento, CA 95812

California Environmental Protection Agency

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Engineering Statement

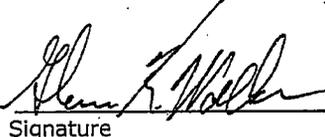
Section 1

Certification Statement for VST Hybrid EVR Balance System with the Healy CAS¹

Based on a careful review and analysis, I hereby certify that the VST Hybrid EVR Balance System with the Healy CAS, which is under consideration for California Air Resources Board (ARB) certification, meets the requirements of Chapter 6.7 of the California Health and Safety Code (the State Water Resources Control Board's underground storage tank requirements, including enhanced leak detection and continuous vacuum, pressure, or hydrostatic monitoring.)².

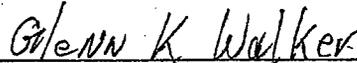
The VST Hybrid EVR Balance System with the Healy CAS warranty is valid as long as the system is installed, operated, and maintained according to manufacturer's instructions and in a manner that does not exceed the limitations described.

Limitations: See the attached Appendix B

 Signature	10-14-09 Date	 Signature	10/16/09 Date
California Professional Engineer C 50985		Company Representative	

Bernie Lingnau
Pacific Petroleum Equipment
5465 Gaines St., #102
San Diego, California




Glenn K. Walker
Vapor Systems Technologies, Inc.
650 Pleasant Valley Drive
Springboro, Ohio 45066

Phone: 619-688-5848
E-Mail: info@pacificpetro.com

Phone: 937-704-9333

¹ This certificate statement is part of the guidelines developed by the California Air Resources Board (ARBB) and State Water Resources Control Board (State Water Board) to implement provisions of Assembly Bill 2955 (Statutes 2004, Chapter 649: McCarthy).

² This certification is based on the presumption that the VST Hybrid EVR Balance System with the Healy CAS is constructed, installed, maintained, and operated in accordance with all applicable requirements of Chapter 6.7 of California Health and Safety Code, and Chapter 16 of California Code of Regulations.



Linda S. Adams
Secretary for
Environmental Protection

State Water Resources Control Board

Executive Office

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Arnold Schwarzenegger
Governor

November 1, 2007

Mr. Glenn Walker
Vapor Systems Technologies, Inc.
650 Pleasant Valley Drive
Springfield, OH 45066

Dear Mr. Walker:

EVALUATION OF THE VAPOR SYSTEMS TECHNOLOGIES, INC. (VST) PHASE II EVR SYSTEM (VR-203-A)

Assembly Bill 2955 (Statutes 2004, Chapter 649) added section 25290.1.2(a) to Chapter 6.7 of the Health and Safety Code (H&SC). This section requires the Air Resources Board (ARB) and State Water Resources Control Board (State Water Board) to certify, to the best of their knowledge and using existing resources, that equipment meeting the ARB's Enhanced Vapor Recovery (EVR) requirements also meets underground storage tank (UST) statutory requirements.

We have received three separate information packets from Vapor Systems Technologies, Inc., (VST) which provide a detailed explanation of your Phase II EVR system. The system consists of dispenser hanging hardware that works to minimize vapor pressure in the UST ullage space, and a vapor processor that can extract clean air from the UST ullage space when pressure exceeds a preset threshold. A Veeder-Root TLS-350 control panel and associated sensors are used to monitor UST ullage pressure and control vapor processor operation. The design, construction, installation, and operation of the VST Phase II EVR system have been reviewed by a California Registered Professional Engineer, as indicated in the enclosed signed statement. Based on this signed statement and the information that you provided, we have found no evidence that the VST Phase II EVR system conflicts with H&SC Chapter 6.7.

UST owners who intend to install this system in California should be aware that:

For UST systems installed prior to July 1, 2003, tank vent lines are excluded from the statutory definition of "underground storage tank" if they are designed to prevent, and do not hold, standing fluid¹. Based on the professional engineer's evaluation, the VST vapor processor does not increase the likelihood of liquid-phase product accumulating in the underground tank vent lines². Because the engineering evaluation indicates that the VST system does not increase the likelihood of liquid-phase product, vent lines that are currently excluded from the definition of "underground storage tank" may continue to be excluded once the VST Phase II EVR system has been installed.

¹ California Health and Safety Code, Chapter 6.7, section 25281.5(a)(4)

² The engineer's evaluation indicates that the vapor concentration returned from the processor to the tank are only 1.8% higher than the vapor concentration found in tank vent lines without a vapor processor.

California regulations³ specify that any installation, repair, maintenance, or programming of monitoring equipment must be done by a qualified service technician meeting the requirements of California Code of Regulations, Title 23, section 2715(i). Installation of the VST Phase II EVR system involves adding sensors, wiring, and possibly software to the Veeder-Root TLS-350 control panel. In cases where the Veeder-Root TLS-350 control panel is being used to satisfy monitoring requirements for the UST system, all work related to the TLS-350 must be performed by a qualified service technician meeting the requirements of section 2715(i).

Permitting and inspection requirements vary among the local regulatory agencies implementing the State Water Board's UST program in jurisdictions throughout California. Depending on the location of the UST, the local agency may require the UST owner/operator to obtain a permit prior to installation of the VST Phase II EVR system and/or to conduct functional testing of the monitoring system after the VST Phase II EVR system has been installed.

Pursuant to H&SC section 25290.1.2(a) the State Water Board certifies that, to the best of its knowledge, the Vapor Systems Technologies, Inc. Phase II EVR system meets the requirements of H&SC Chapter 6.7. This determination assumes the Vapor Systems Technologies, Inc. Phase II EVR system is installed in accordance with applicable ARB Executive Orders, manufacturer's instructions, and the limitations outlined in this letter.

If you have questions regarding this letter, please contact Ms. Laura Chaddock at (916) 341-5871, or by email at lochaddock@waterboards.ca.gov.

Sincerely,



Dorothy Rice
Executive Director

Enclosure: Certification Statement for the VST Phase II EVR System

³ California Code of Regulations, Title 23, sections 2611 and 2638

Engineering Statement

Section 1

Certification Statement for VST's ECS Membrane Processor¹

Based on a careful review and analysis, I hereby certify that the ECS Membrane Processor, which is under consideration for California Air Resources Board (ARB) certification, meets the requirements of Chapter 6.7 of the California Health and Safety Code (the State Water Resources Control Board's underground storage tank requirements, including enhanced leak detection and continuous vacuum, pressure, or hydrostatic monitoring.)².

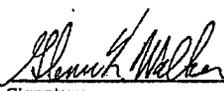
The ECS Membrane Processor warranty is valid as long as the system is installed, operated, and maintained according to manufacturer's instructions and in a manner that does not exceed the limitations described.

Limitations: See the attached Appendix B


Signature _____ Date 10/16/07
California Professional Engineer
C 50985

Bernie Lingau
Pacific Petroleum Equipment
5465 Gaines St., #102
San Diego, California 92110

Phone: 619-688-5848
E-Mail: info@pacificpetro.com


Signature _____ Date 10/17/07
Company Representative


Vapor Systems Technologies, Inc.
650 Pleasant Valley Drive
Springboro, Ohio 45066

Phone: 937-704-9333

¹ This certificate statement is part of the guidelines developed by the California Air Resources Board (ARB) and State Water Resources Control Board (State Water Board) to implement provisions of Assembly Bill 2955 (Statutes 2004, Chapter 649: McCarthy).

² This certification is based on the presumption that the ECS Membrane Processor is constructed, installed, maintained, and operated in accordance with all applicable requirements of Chapter 6.7 of California Health and Safety Code, and Chapter 16 of California Code of Regulations.



Linda S. Adams
Secretary for
Environmental Protection

State Water Resources Control Board

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Arnold Schwarzenegger
Governor

November 13, 2006

Mr. Paul Bauer
Healy Systems, Inc.
18 Hampshire Drive
Hudson, NH 03051

Dear Mr. Bauer:

EVALUATION OF MODIFICATIONS TO HEALY EVR PHASE II SYSTEM (VR 201-B)

As you know, Assembly Bill 2955 (Statutes 2004, Chapter 649) added section 25290.1.2(a) to Chapter 6.7 of the Health and Safety Code (H&SC). This section requires the Air Resources Board (ARB) and State Water Resources Control Board (State Water Board) to certify, to the best of their knowledge and using existing resources, that equipment meeting the ARB's Enhanced Vapor Recovery (EVR) requirements also meets underground storage tank (UST) statutory requirements.

We reviewed the entire Healy EVR Phase II System in 2005 and determined that the system does not conflict with UST statutory requirements. (See the enclosed determination letter, dated April 7, 2005.) The proposed modifications to Healy EVR Phase II System that we reviewed in 2005 are as follows:

- The hold open clip on the dispenser nozzle will have only two positions, rather than the three positions indicated in the original system, As an option, the Model 807 Swivel Breakaway and 1302 Flow Limiter may be used in lieu of the Model 8701VV Breakaway and 1301 Flow Limiter that were specified in the original system.

Because the proposed modifications to the Healy EVR Phase II System are very minor and involve only components that are not part of the UST system as regulated by the State Water Board¹, the enclosed April 7, 2005 determination letter applies to the system as described in VR 201-A and VR 201-B.

¹ Chapter 6.7, H&SC, section 25281.5(a)(3) exempts "unburied delivery hoses, vapor recovery hoses, and nozzles that are subject to unobstructed visual inspection for leakage" from the definition of pipe.

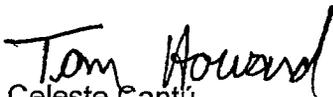
Mr. Paul Bauer

- 2 -

November 13, 2006

If you have questions regarding this letter, please contact Scott Bacon at (916) 341-5873, or by email at sbacon@waterboards.ca.gov.

Sincerely,

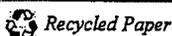

Celeste Cantu
Executive Director

Enclosure: April 7, 2005 determination letter for the Healy EVR Phase II System

cc: Ms. Catherine Witherspoon
Executive Officer
Air Resources Board
1001 I Street
Sacramento, CA 95814

Mr. Don Johnson
Assistant Secretary
California Environmental Protection
Agency
1001 I Street
Sacramento, CA 95814

California Environmental Protection Agency





State Water Resources Control Board



Alan C. Lloyd, Ph.D.
Agency Secretary

Executive Office

Arthur G. Baggett, Jr., Chair
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Arnold Schwarzenegger
Governor

APR - 7 2005

Mr. Paul Bauer
Healy Systems, Inc.
17 Hampshire Drive
Hudson, New Hampshire 03051

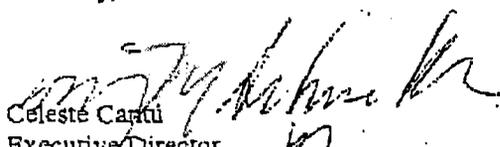
Dear Mr. Bauer:

HEALY SYSTEMS, INC., PHASE II ENHANCED VAPOR RECOVERY (EVR) SYSTEM

As you know, Assembly Bill 2955 (Statutes 2004, Chapter 649) added a provision to the Health and Safety Code (H&SC), chapter 6.7, section 25290.1.2(a). This section requires the Air Resources Board (ARB) and State Water Resources Control Board (State Water Board) to determine collaboratively, to the best of their knowledge and using existing resources, that the equipment that meets the ARB's Enhanced Vapor Recovery (EVR) requirements also meets UST statutory requirements. We discussed this requirement in a joint letter from the Air Resources Board and the State Water Board to you dated January 24, 2005.

On April 6, 2005 we received on your behalf the enclosed signed statement by a California Professional Engineer. Based on this statement and the information that Healy Systems, Inc. provided to us, we have found no evidence that this EVR System conflicts with H&SC Chapter 6.7. This determination assumes the EVR System is installed in accordance with applicable ARB Executive Orders and in accordance with manufacturers' instructions, as required by State Water Board regulations. Therefore, pursuant to H&SC section 25290.1.2(a), the State Water Board certifies that, to the best of our knowledge, the Healy Phase II EVR system meets the requirements of H&SC Chapter 6.7.

Sincerely,


Celeste Cantu
Executive Director

Enclosure

cc: Catherine Witherspoon
Executive Officer
Air Resources Board
1001 I Street
Sacramento, CA 95814

Don Johnson
Assistant Secretary
Cal/EPA
1001 I Street
Sacramento, CA 95814

California Environmental Protection Agency

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**Certification Statement for
Healy Systems, Inc. Phase II Enhanced Vapor Recovery System¹**

Based on a careful review and analysis, I hereby certify that Healy Systems, Inc. Phase II Enhanced Vapor Recovery (EVR) System, which is under consideration, for California Air Resources Board (ARB) certification, meets the requirements of Chapter 5.7 of the California Health and Safety Code (the State Water Resources Control Board's underground storage tank requirements, including enhanced leak detection and continuous vacuum, pressure, or hydrostatic monitoring). Furthermore, the Healy Systems, Inc. Phase II EVR System warranty is valid as long as the system is installed, operated, and maintained according to manufacturer's instructions and in a manner that does not exceed the limitations (e.g., tank capacity, fueling points, throughputs, etc.) described below.

Limitations:

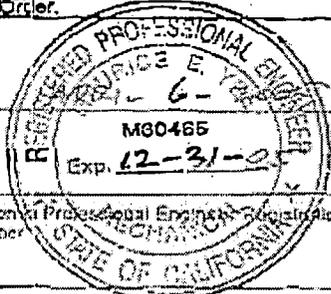
The system must be installed, maintained and operated in accordance with the California Air Resources Board "Executive Order VR-201-A", Healy Systems, Inc. Phase II Enhanced Vapor Recovery (EVR) System Not Including ISD and the CARB - Approved (IOM) "Installation, Operation and Maintenance Manuals" which is part of the Executive Order.

Signed by (California Professional Engineer)

[Signature]
MAURICE E. YEE

Printed Name (California Professional Engineer)

Date



California Professional Engineer Registration Number

Company Name

Healy Systems, Inc.

Mailing Address

18 Hampden Drive

City, State, Zip Code

Hudson NH 03051

Signed by (Healy Systems, Inc Representative)

James W. Healy

Date

April 6, 2005

¹ This certification statement is part of the guidelines developed by the California Air Resources Board (ARB) and State Water Resources Control Board (State Water Board) to implement the provisions of Assembly Bill 2865 (Statutes 2004, Chapter 049; McCarty).

² This certification is based on the presumption that the Healy Systems, Inc. Phase II EVR System is constructed, installed, maintained, and operated in accordance with all applicable requirements of Chapter 5.7 of California Health and Safety Code and Chapter 18 of California Code of Regulations.