



Linda S. Adams
Secretary for
Environmental Protection

State Water Resources Control Board

Division of Water Quality

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Arnold Schwarzenegger
Governor

CERTIFIED MAIL NO. 7003 1680 0000 6172 5280

July 3, 2008

Mr. Mike Lewis
Western Fiberglass, Inc.
1555 Copperhill Way
Santa Rosa, CA 95403

Dear Mr. Lewis:

CONDITIONAL APPROVAL OF THE WESTERN FIBERGLASS UNDER DISPENSER TRANSITION FRAME, AS AN UNDER DISPENSER SPILL CONTAINMENT OR CONTROL SYSTEM (UDSCCS)

This letter is in response to your application for approval of the Western Fiberglass Under Dispenser Transition Frame as described below.

Description of the UDSCCS

The Western Fiberglass Under Dispenser Transition Frame is a conversion frame designed to allow larger dispensers to be installed above smaller existing under-dispenser containment (UDC). When piping within the dispenser falls outside the footprint of the UDC, Western Fiberglass Under Dispenser Transition Frame is designed to direct any leaking product into the UDC where it will be contained and detected, as required by California regulations¹.

The Western Fiberglass Under Dispenser Transition Frame is fabricated using a metal splashguard rim and a fiberglass deflector shield. The fiberglass deflector shield is manufactured using a spray-up process (chopper gun construction) of chopped fiberglass, polyester resin, and hardener. These materials are combined as they are sprayed onto a mold to a thickness of 3/16 of an inch. The material is rolled to remove air and to verify contact with the mold, followed by curing and removal from the mold. Enclosure 1 shows a typical drawing of the Western Fiberglass Under Dispenser Transition Frame. Exact dimensions are determined from the design specifications

¹ For a detailed explanation of the requirements for dispenser piping refer to the State Water Board's December 21, 2007 letter "Clarification of Existing Regulations for Under-Dispenser Containment."

supplied to Western Fiberglass by the manufacturer of the dispenser, or from the contractors' onsite measurements.

Review Process

Pursuant to California Code of Regulations (CCR), Title 23, § 2636(g)(3), we have reviewed the application to determine whether the system adequately protects the soil and beneficial uses of groundwater. During the review process the State Water Resources Control Board (State Water Board) received and reviewed the following documents: *Western Fiberglass Under Dispenser Transition Frame* product literature; *State Registered Professional Engineer Approval* letter; *Conversion Frame Specifications*; and *Western Fiberglass Under Dispenser Transition Frame Installation Instructions*. A California registered Professional Engineer has examined the Western Fiberglass Under Dispenser Transition Frame, reviewed the installation and maintenance instructions, and concluded that the Western Fiberglass Under Dispenser Transition Frame is acceptable for adapting a previously installed UDC to a new dispenser (Enclosure 2).

Conditions of Approval

Based on the Professional Engineer's review and the documentation you have submitted, we are granting approval of the fiberglass version of the Western Fiberglass Under Dispenser Transition Frame under the following conditions:

1. This model comes in several sizes in order to accommodate various dimensions of UDC and dispenser. Schematics and molds of all existing and future sizes for the Western Fiberglass Under Dispenser Transition Frame shall be made available upon request of the State Water Board.
2. Materials and procedures employed in the construction of the Western Fiberglass Under Dispenser Transition Frame shall remain the same as the materials and procedures that were indicated in the documents reviewed by the State Water Board.
3. Installation procedures in no way supersede local, State, and federal regulations. Installers must obey all local laws, regulations, and requirements when installing the Western Fiberglass Under Dispenser Transition Frame.
4. The procedures submitted in the approval process (*Western Fiberglass Under Dispenser Transition Frame Installation Manual*) must be followed in their entirety. Any variations in the installation procedures must be reviewed and approved by the State Water Board.

5. Only installers meeting the requirements of CCR, Title 23, § 2715(h), including training and certification by the manufacturer (Western Fiberglass, Inc.), are allowed to install this product.
6. Final authority to approve the use of the Western Fiberglass Under Dispenser Transition Frame in a particular jurisdiction rests with the local regulatory agency. The local agency may require pre-approval, permit, and/or inspection of the installation by either local agency staff or a registered professional engineer (special inspector) who has education and experience with underground storage tank (UST) system installations.
7. Per CCR, Title 23, § 2636(f)(1) the UDC must be equipped with a continuous monitoring system that either activates an audible and visual alarm or stops the flow of product at the dispenser when it detects a leak. The placement of the under-dispenser spill control or containment systems shall not interfere with the continuous monitoring system.
8. The Western Fiberglass Under Dispenser Transition Frame shall not interfere with the capability to conduct any required secondary containment testing of the UDC or the maintenance of leak detection equipment.
9. Per CCR, Title 23, § 2636(g)(3)(C), the Underground Storage Tank Program Manager may modify or revoke this approval, at any time, if there is any evidence that Western Fiberglass Under Dispenser Transition Frame fails to adequately protect the soil and beneficial uses of groundwater from unauthorized releases.
10. Each frame is only considered to be approved as long as it is manufactured, installed, operated, and maintained in accordance with Western Fiberglass' requirements and the State Water Board's regulations.
11. The Western Fiberglass Under Dispenser Transition Frame shall not carry the load of the dispenser and shall not interfere with the installation requirements specified by the dispenser manufacturer. This approval in no way relieves the manufacturer or installer from responsibility for ensuring that the dispenser is properly secured in accordance with applicable codes, regulations, dispenser manufacturers installation instructions, and sound engineering practice.
12. This approval is based solely on UST statutes and regulations and does not take into account other codes that may apply (i.e., fire code, building code, etc.).

Mr. Mike Lewis

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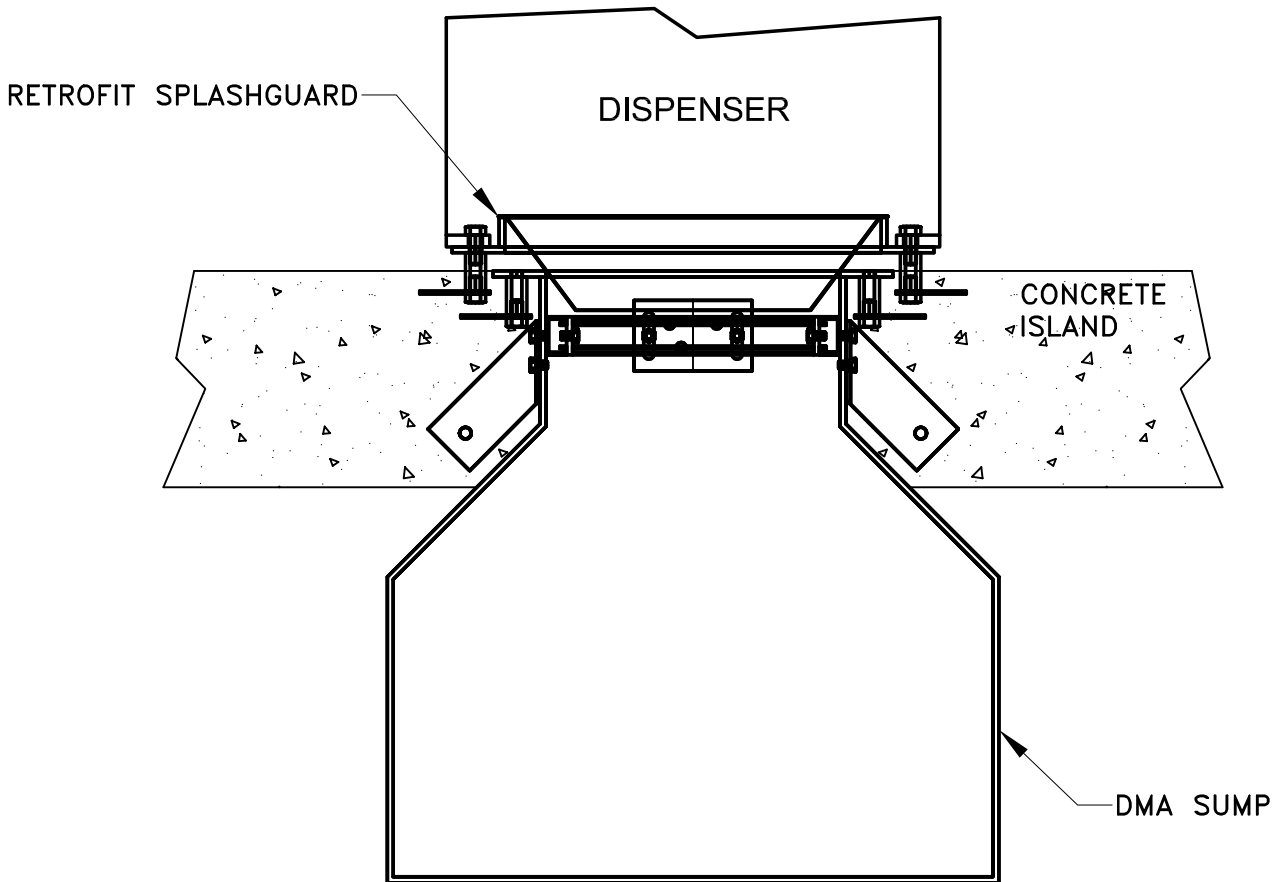
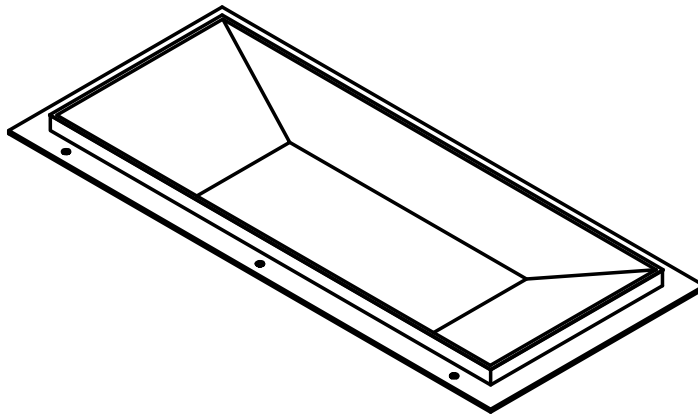
If you have any questions concerning this letter, please contact Donielle Jackson at (916) 341-5863 or dljackson@waterboards.ca.gov.

Sincerely,

Original signed by

Kevin L. Graves, P.E.
Underground Storage Tank Program Manager

Enclosures: 1) Western Fiberglass Under Dispenser Transition Frame Drawing
2) Professional Engineer's Signed Statement



Western Fiberglass Inc.
 Santa Rosa, Calif.
 800 688-3375
 Fax 800 700-1188
 www.westernfg.com

DESCRIPTION
**DISPENSER MOUNTING ASSEMBLY
 WITH RETROFIT SPLASHGUARD**

MODEL #

PART #

DRAWN

DL-080611-01

06-11-08

SCALE

SHEET

1 OF 1

James H. Ray
CIVIL ENGINEER
2041 Hidden Valley Drive
Santa Rosa, CA 95404
707-480-8115

April 21, 2008

Western Fiberglass, Inc.
1555 Copper Hill Parkway
Santa Rosa, CA 95403

**RE: UNDER-DISPENSER SPILL CONTAINMENT OR CONTROL SYSTEM
WESTERN FIBERGLASS
UDC TRANSITION CONTAINMENT FRAME
FIBERGLASS VERSION AND FLEXIBLE VERSION**

REVIEW BY STATE REGISTERED PROFESSIONAL ENGINEER

This System is designed to maintain the integrity of the existing under dispenser containment structure when a replacement larger dispenser is installed over an existing small dispenser containment sump.

I have examined and reviewed the following items and material:

1. Examined the Fiberglass Version of the UDC Transition Containment Frame.
2. Examined the Flexible Version of the UDC Transition Containment Frame.
3. Reviewed a copy of the Document Review List submitted to SWRCB for the fiberglass Item 1
4. Reviewed a copy of the Document Review List submitted to SWRCB for Item 2 including Petro Gard VI Chemical Compatibility Chart and Performance Specification.
5. Field Installation Manual
6. Maintenance Guidelines

Upon review of the materials and construction it is my opinion and conclusion that sound engineering and design of the products allow for the replacement of an existing dispenser leaving the existing under-dispenser containment in place.

James H. Ray

James H. Ray
Civil Engineer

