



Linda S. Adams
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov



Arnold Schwarzenegger
Governor

August 27, 2007

#07-05

Mr. David Lyzinski
PetroTechnik Limited
Olympus Close
Whitehouse Industrial Estate
Ipswich, Suffolk IP1 5LN, United Kingdom

Dear Mr. Lyzinski:

Thank you for your letter dated March 12, 2007, in which you requested Air Resources Board (ARB) certification for PetroTechnik's new Universal Petropipe (UPP) semi-rigid piping for use in vapor recovery piping applications, utilizing underground storage tanks (UST) and buried vapor return piping. The original UPP piping Approval Letter #02-13 was issued by ARB on October 18, 2002. An additional yellow layer of nylon material was added to the new UPP secondary pipe to meet UL 971 listing. The new UPP pipes that were submitted for ARB testing were: Primary two inch (product code number 001.075.063.033PS) and three inch (product code number 001.110.090.019PS) and associated secondary piping (see enclosure).

The new UPP pipe system is still a high-density polyethylene (HDPE) pipe with an internal yellow nylon barrier lining on the inside of the primary and secondary pipes (see enclosure). The new UPP pipes and fittings are connected by electro-fusion welded joints and have full secondary containment – when the double wall fittings are utilized. **Only the new UPP piping that comes in straight lengths as shown in the enclosure has been evaluated for use as vapor return piping.**

Pursuant to sections 25290.1.2, 41955, and 41957 of the California Health and Safety Code, the approval or determination from four state agencies are a precondition to certification by ARB. We have received the appropriate approval or determination letters from the agencies listed below.

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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- Department of Food and Agriculture
Division of Measurement Standards
June 20, 2007
- Department of Industrial Relations
Division of Occupational Safety and Health
May 4, 2007
- Office of the State Fire Marshal
Department of Forestry and Fire Protection
July 18, 2007
- State Water Resources Control Board
Division of Water Quality
April 26, 2007

The new UPP pipe system was tested by ARB's test procedure, TP-201.2G, Bend Radius Determination for Underground Storage Tank Vapor Return Piping. The new UPP pipes met the bend radius requirements set forth in section 4 of the Vapor Recovery Certification Procedure CP-201.

As required by the Vapor Recovery Certification Procedure, CP-201, the new UPP pipe system shall be installed in accordance with section 4.12 for vapor return piping. This applies to piping used for vapor return paths from the dispenser riser to the UST and from the vapor vent stack riser to the UST at gasoline dispensing facilities (GDF).

The following list includes additional requirements and recommendations for installation of the new UPP pipe system:

- UST shall be manifolded together.
- No piping sold or transported in rolls (coils) shall be used.
- Inspect and verify that the proper slope is at least 1/8 inch per foot after final grade of pipe bedding has been established and prior to back-filling piping trenches. Bedding material (pea gravel or like) should be brought up to at least 50 percent and no more than 90 percent of pipe diameter prior to inspection.
- Back-pressure and liquid blockage testing are required once final grade of station has been established and all finished surfaces applied. The test shall be conducted in accordance with TP-201.4, the Dynamic Back-Pressure Test.

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- Back-pressure and liquid blockage testing of the new UPP pipe system at GDF are recommended to be performed annually in accordance with TP-201.4, the Dynamic Back-Pressure Test.

The new UPP pipe system (single and double wall), when installed in accordance with the recommendations listed above, will not adversely affect the performance of a Phase II vapor recovery system utilizing UST and buried vapor return piping. Therefore, the new UPP piping system is certified for use in Phase II vapor recovery applications.

If you have any questions or need further assistance, please contact Sam Vogt at (916) 322-8922 or via email at svogt@arb.ca.gov, or Joe Guerrero at (916) 324-9487 or via email at jguerrero@arb.ca.gov.

Sincerely,



William V. Loscutoff, Chief
Monitoring and Laboratory Division

Enclosure

cc: Kevin Graves
State Water Resources Control Board

John Marvin
Bay Area Air Quality Management District

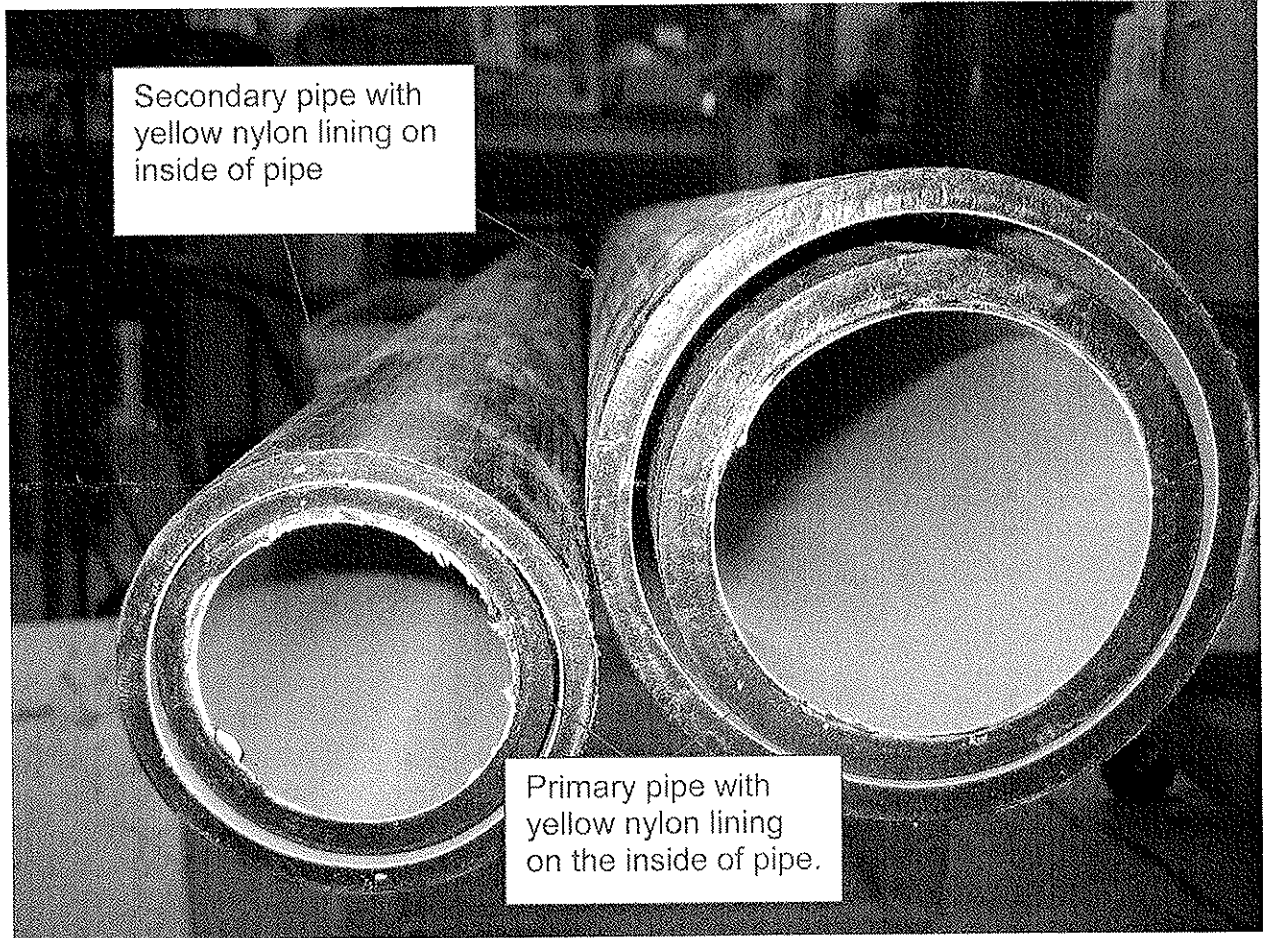
Randy Matsuyama
South Coast Air Quality Management District

Randy Smith
San Diego County Air Pollution Control District

Jim Swaney
San Joaquin Valley Air Pollution Control District

Gary Ma
Yolo-Solano Air Quality Management District

New PetroTechnik Pipe



Product Name	Product Code**	Product size	Actual I.D.	Wall thickness
UPP- Double Wall*	001.075.063.033PS	2"	2"	1/4"
UPP- Double Wall*	001.110.090.019PS	3"	2 3/4"	3/8"

* Actual name in Product Catalog is: UPP Extra Pipe – lined – UL971
Double Wall – Product, Vent & Vapor

** Product code is only stamped on the 2" and 3" secondary pipes.

Note: A double-wall pipe consists of a primary pipe inside a secondary pipe, while a single wall pipe consists of a primary pipe only. The primary and secondary pipes have a yellow nylon lining running the length of the pipe. All pipe measurements are approximate.