



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

October 22, 2007

#07-06

Mr. Georges Boyazis
Innovative Petroleum Products LLC
317 Vicki Towers Lane
St. Augustine, Florida 32085-1102

Dear Mr. Boyazis:

Thank you for your letter dated December 8, 2006, in which you requested Air Resources Board (ARB) certification for Innovative Petroleum Products's (IPP) new Petroplas semi-rigid piping for use in vapor recovery piping applications, utilizing underground storage tanks (UST) and buried vapor return piping. IPP pipes that were submitted for ARB testing were: Primary two and three inch Petroplas pipes and associated secondary piping (see enclosure).

IPP piping consists of a fluorinated high-density polyethylene (HDPE) material. The primary piping is white while the secondary piping is yellow with corrugated strips that run the length of the inside diameter (see enclosure). IPP pipes and fittings are connected by electro-fusion welded joints. **Only the IPP 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.

- Department of Food and Agriculture
Division of Measurement Standards
September 27, 2007
- Department of Industrial Relations
Division of Occupational Safety and Health
February 26, 2007

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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- Office of the State Fire Marshal
Department of Forestry and Fire Protection
February 15, 2007
- State Water Resources Control Board
Division of Water Quality
April 26, 2007

The IPP Petroplas pipe was tested by ARB's test procedure, TP-201.2G, Bend Radius Determination for Underground Storage Tank Vapor Return Piping. The IPP 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, IPP pipes 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 UST and from the vapor vent stack riser to UST at gasoline dispensing facilities (GDF).

The following list includes additional requirements for installation of the new IPP Petroplas pipe:

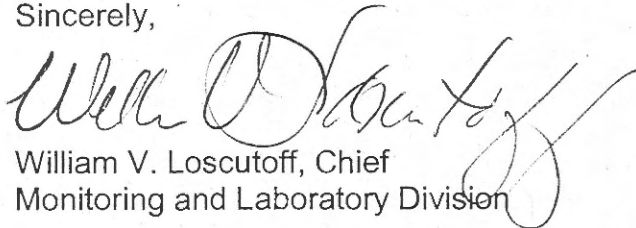
- UST shall be manifolded together.
- No piping sold or transported in rolls (coils) shall be used.
- Inspect and verify that the proper slope is at least 1/8 inch per foot after final grade of pipe bedding has been established and prior to back-filling piping trenches. Bedding material (pea gravel or 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.

IPP Petroplas pipe, when installed in accordance with the requirements listed above, will not adversely affect the performance of a Phase II vapor recovery system utilizing UST and buried vapor return piping. Therefore, IPP Petroplas pipe is certified for use in Phase II vapor recovery applications.

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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

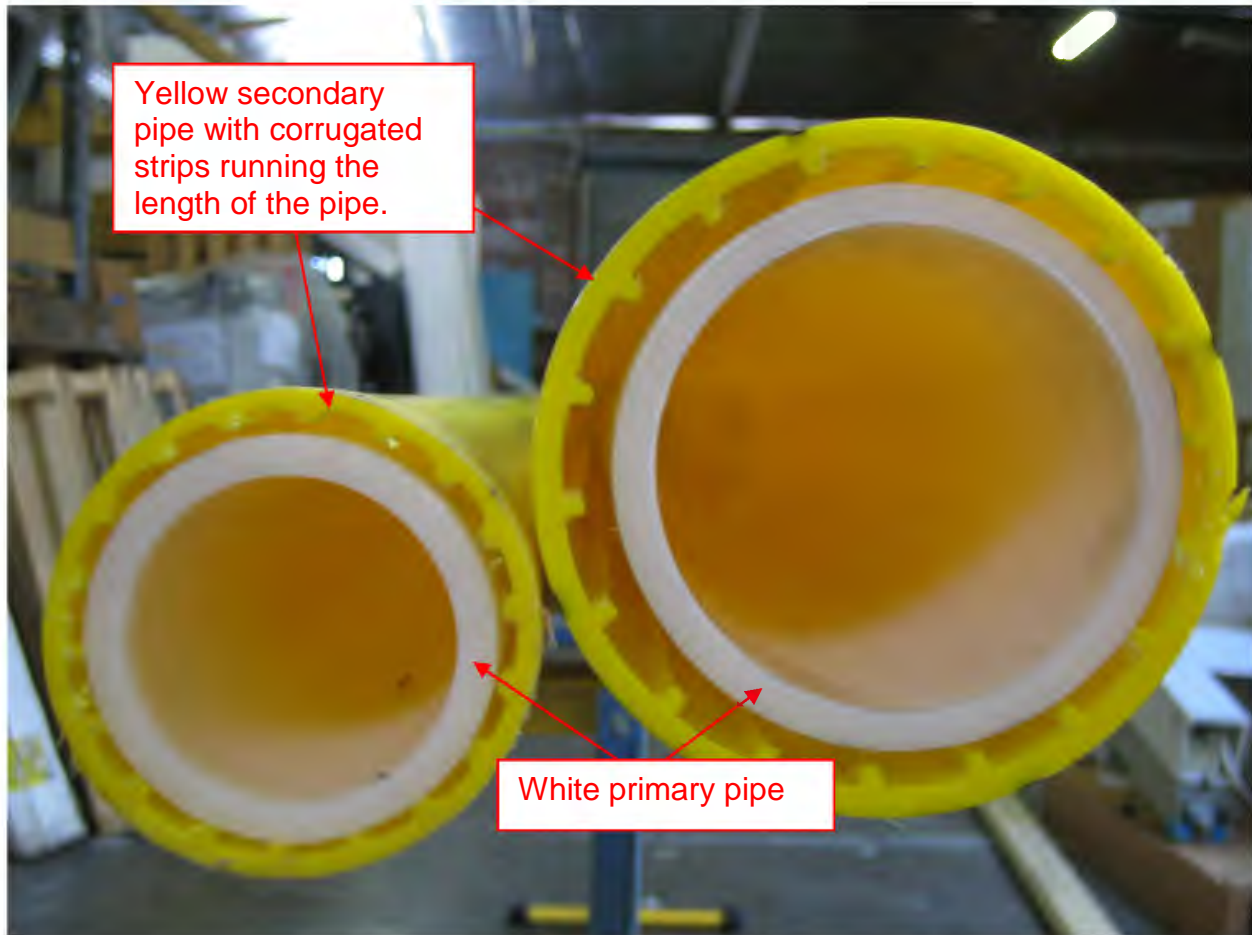
Randy Matsuyama
South Coast Air Quality Management District

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

Innovative Petroleum Products (IPP) Petroplas piping



Product Name	Product size	Actual I.D.
Petroplas Double Wall (Yellow) Underground	2" *	2"
	3" **	3"

* Actual name in Product Catalog is: 2" Diameter Double Wall Pipe

** Actual name in Product Catalog is: 3" Diameter Double Wall Pipe

Note: A double-wall pipe consists of a primary pipe inside a secondary pipe. The primary pipes are white in color and secondary pipes are yellow with corrugated strips running the length of the pipe. All pipe measurements are approximate.