

DEPARTMENT OF INDUSTRIAL RELATIONS

DIVISION OF OCCUPATIONAL SAFETY & HEALTH

455 GOLDEN GATE AVENUE 10TH FL.
SAN FRANCISCO, CA 94102
(415) 703-5100



October 30, 2002

Dan Wendt, Western Regional Sales Manager
NUPI Americas, Inc.
2460 Skyview Circle
Fairfield, CA 94534

SUBJECT: Approval of vapor recovery equipment
(SMARTFLEX nonmetallic pipes and fittings)

Dear Mr. Wendt:

This is in response to your request for approval from the Division of Occupational Safety and Health (DOSH) for the use of NUPI SMARTFLEX pipe and fittings as part of gasoline vapor recovery systems approved by the California Air Resources Board (CARB). A prerequisite to the CARB certification of equipment for Stage I and II vapor recovery systems is the approval of other agencies such as the State Fire Marshall, the Division of Measurement Standards, and DOSH. DOSH is the only agency responsible for determining whether any gasoline vapor recovery system, or component thereof, creates a safety hazard other than a fire hazard to employees or the public. If DOSH determines that a system or component thereof creates a safety hazard, that system or component may not be used until the hazard is corrected and DOSH has certified that the system or component, as the case may be, does not create that hazard (California Health and Safety Code Section 49157).

At the time of your request, you submitted technical data sheets, a product catalogue and a report from Underwriter's Laboratories, Inc. (UL). According to the technical data sheets and product catalogue, SMARTFLEX is a system of polyethylene pipes and fittings used both for the conveyance of liquid fuels, and for vapor recovery/ventilation lines. Piping is available in both single-wall and double-wall configurations; the double-wall configuration includes a positive-pressure jacket and a leak monitoring system. Pipes and fittings are connected by plastic fittings joined by an electro-fusion welding process. According to the UL report, SMARTFLEX nonmetallic pipes and fittings meet the requirements of UL971 (Standard for Nonmetallic Underground Piping for Flammable Liquids).

Based on this information the Division has concluded that SMARTFLEX pipe and fittings are acceptable and do not appear to create a safety hazard as defined in Health and Safety Code Section 41957. This approval is based on the understanding that the pipe and fittings will be installed and maintained in strict accordance with your written instructions (including the protocol for electro-fusion welding of joints). Any questions regarding this matter may be directed to Principal Safety Engineer Larry McCune at (415) 703-5163.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry McCune". The signature is fluid and cursive, written in a professional style.

Larry McCune, P. E.
Principal Engineer

jsf/lm/oc

cc: George Lew, Chief (w/o Encl.)
Engineering and Certification Branch
Monitoring and Laboratory Division
California Air Resources Board (CARB)
PO Box 2815
Sacramento, CA 95812

Sr. Safety Staff (w/o Encl.)