

Larry Hogan, Governor Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary Horacio Tablada, Deputy Secretary

February 7, 2020

Mr. Alex Perry NOV Fiber Glass Systems 1624 Ridge Bend Drive Wildwood, Missouri 63038

RE: Approval for NOV Fiber Glass Systems, Red Thread <sup>TM</sup> IIA HP50 Riser Pipe and BxMN Riser Adapter

Dear Mr. Perry:

The Maryland Department of the Environment's (MDE) Oil Control Program has evaluated National Oilwell Varco (NOV) Fiber Glass System's Red Thread IIA HP50 riser pipe and BxMN riser adapter. The fiberglass reinforced plastic (FRP) riser pipe is designed with the same inside diameter as a 4-inch diameter schedule 40 pipe, a minimum wall thickness of 0.145 inch, and must be installed using the 4-inch BxMN riser adapter. The riser pipe was tested by UL, LLC (UL) and found to be constructed in accordance with UL Follow-Up Service Inspection Procedure, MH9162, and with the intended use as underground riser piping.

MDE notes that Code of Maryland Regulation (COMAR) 26.10.03.02C does not permit the use of FRP piping systems for direct fill lines on UST systems. However, in accordance with COMAR 26.10.03.02B.(3), MDE may approve alternative methods of piping construction and corrosion protection if determined to be adequate to prevent a release or threatened release of any regulated substance in a manner that is not less protective of human health and the environment. The FRP riser pipe and adapter fitting will serve to prevent corrosion of UST risers that have caused issues for UST owners maintaining and performing routine maintenance and inspections of UST system components (e.g. drop tubes, ATG probes, overfill devices).

MDE hereby approves the installation of the NOV Red Thread IIA HP50 riser pipe and the BxMN riser adaptor on USTs in Maryland, including use for direct fill lines connected to spill catchment basins. The Maryland certified UST technician installing the FRP riser pipe with riser adapter must hold a valid FRP pipe installer certification from NOV at the time of installation. The NOV Red Thread IIA HP50 riser pipe and the BxMN riser adaptor must be installed as prescribed by NOV Fiber Glass Systems assembly instructions. The FRP riser pipe is not approved for aboveground use.

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If you have any questions, please contact Mr. Thomas Walter, Chief of the Compliance Division, at 410-537- 3442 (email: <a href="mailto:tom.walter@maryland.gov">tom.walter@maryland.gov</a>).

Sincerely,

Christopher H. Ralston

Program Manager, Oil Control Program

cc: Mr. Joe Flick, Eastern States Assoc., Inc.

Mr. Ronald "RJ" Stumpfl, Containment Solutions

Mr. Michael Jester, Regional Supervisor, Oil Control Program

Ms. Marsha Mason, Regional Supervisor, Oil Control Program

Ms. Jackie L. Ryan, Regional Supervisor, Oil Control Program

Mr. Thomas L. Walter, Chief of Compliance Division, Oil Control Program