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TO WHOM IT MAY CONCERN

Subject: Integrity Testing of Convault Tanks

Convault shop fabricated aboveground storage tanks have 4 to 6 inch high legs, which make them visible from the bottom and all sides. Furthermore, Convault tanks have secondary containment with leak detection capability and are expected to be checked and inspected on regular basis. The probability of any fuel discharge from Convault tank due to primary tank failure is highly minimal as any discharge will be detected in the leak detector tube and the fuel will be contained in the integral secondary containment.

In view of the above, Convault does not recommend an integrity test on its tanks when preparing, updating or revising the SPCC plans. Convault recommends an integrity test on its tank only if there is a substantial reason to carry out such a test. Typical reasons would include the detection of fuel in the secondary containment, the tank surviving a catastrophic event such as a fire or a heavy vehicle impact, or the Authority Having Jurisdiction (such as a fire marshal) specifically requiring an integrity test. If testing is required, please refer to Convault owner manual testing protocol.

Should you have any questions, please contact the undersigned.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "John Ekhtiar".

John Ekhtiar
Vice President, Engineering