

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 7, 2011

Bruce Bragg
Catlow Manager National Accounts
2750 US Route
Tipp City, Ohio 45371

Re: Catlow CamTwist Magnetic (CTMVA) Breakaway

Dear Mr. Bragg:

The Texas Commission on Environmental Quality has reviewed the *Final Report for Catlow CamTwist Magnetic (CTMVA) Breakaway when used with a Healy 800 ORVR Vac-Assist System*, dated January 9, 2011. A Stage II vapor recovery system or component must be independently evaluated by a third party to be certified for use in Texas as required by Title 30 Texas Administrative Code (TAC) §115.243(2). Packer Engineering Incorporation conducted the third-party evaluation.

The CTMVA breakaway was tested for approval with Healy on-board refueling vapor recovery (ORVR) vac-assist systems. The required components are listed in Attachment 1 of the final report and included as an enclosure to this letter. In accordance with 30 TAC §115.243(2), the Catlow CamTwist magnetic CTMVA breakaway and components, as applicable to existing or new installations, is hereby certified for use with Healy ORVR vac-assist systems, as approved by the California Air Resource Board Executive Order number G-70-191-AA, for use in Texas when installed and operated in accordance with manufacturer recommendations.

For further assistance, please contact Ms. Lisa Shuvalov of my staff at Lisa.Shuvalov@tceq.texas.gov or (512) 239-4484.

Sincerely,

A handwritten signature in black ink, appearing to read "David Brymer".

David Brymer, Director

Air Quality Division

DB/LS/kb

Enclosure

Catlow CTMVA Magnetic Breakaway Compatibility with Healy ORVR Phase II Vapor Recovery System Parts List.

List of Critical Components

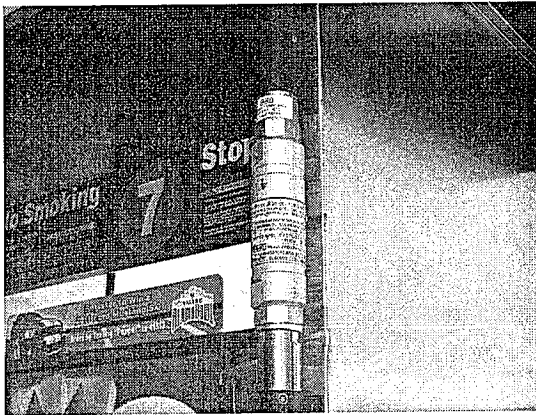
Attachment I

The Catlow CTMVA Magnetic Breakaway is a vacuum assist Stage II vapor recovery component available as a field retrofit kit for the Healy ORVR Vapor Recovery System. The Healy system is currently approved by CARB Executive Order CARB Executive Order # G-70-191-AA.

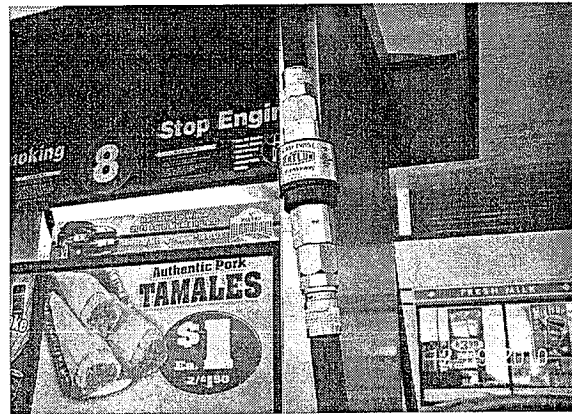
The following system components are new or modified for use in the Healy ORVR system and can be interchanged with the Healy breakaway Model 8701 VV, to be used with or without Healy Model 715V (Vapor Valve Kit)

1. Catlow CTMVA Magnetic Breakaway for Stage II Vapor Recovery systems
2. (2) M3418 "Adapters" M-34 to 1 1/4 inch straight thread (Healy style).

No other system modifications are required to install the Catlow CTMVA with adapters.



Healy 8701 VV



Catlow CTMVA with Adapters