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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 29, 2004

Mr. Ken Pope
GILBARCO Inc.
P O BOX 22087
Greensboro NC 27420

Mr. Glenn Walker
Vapor Systems Technologies Inc.
2030 Webster Street
Dayton OH 45404

RE: GILBARCO / VST ORVR COMPATIBILITY

Dear Sirs:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the final report entitled "Gilbarco / VST ORVR Vehicle Compatibility System for the Gilbarco Vapor Vac Stage II Vapor Recovery Assist System" dated December 13, 2004. This system's third party evaluation in Houston was conducted by, and the final report prepared by, Mr. Bob McKinney of Ken Wilcox Associates, Inc. and independently certified by Mr. P.D. Kelly, P.E.

The system which was tested for Texas approval (and further described in the third party evaluation final report) is a Gilbarco VaporVac system (CARB Executive Order G-70-150-AE) slightly modified by the addition of Gilbarco dispenser mounted ORVR valve and associated dispenser piping, VST ORVR Vac Assist Nozzle (EVR-NZG +color code), VST ORVR Vac Assist Primary Hose (VST-ISG-(length) -SS), VST Vac Assist Breakaway (VST-ISG-SBK), and VST ORVR Vac Assist WHIP hose with or without flow limiter.

In accordance with 30 Texas Administrative Code (TAC) 115.243(2); the above described system or components, as applicable to existing or new installations, is **hereby approved as a Stage II system for use in Texas** when installed and operated in accordance with manufacturers recommendations and applicable portions of G-70-150-AE. In addition, the above described system is **approved as ORVR Compatible in Texas** under the current rule definition in 30 TAC 115.240(a)(2). It will also satisfy the proposed revised definition in 30 TAC 115.240(a)(2) which was proposed on November 17, 2004.

If I may be of any further assistance please contact me at 512.239.2620.

Yours truly,

Handwritten signature of Roger S. Vaughan in cursive.

Roger S. Vaughan, P.E.
Staff Engineer
PST and Stage II Technical Services
Registration and Reporting Section
Registration, Review and Reporting Division