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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 12, 2007

Mr. Jay Mutina
District Manager
OPW
5014 Blossom St.
Houston, TX 77007

RE: OPW Onboard Refueling Vapor Recovery (ORVR) System with the 12VW Nozzle and 66 CAS Breakaway

Dear Mr. Mutina:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the "Test Report for the OPW ORVR System with the 12VW Nozzle and 66 CAS Breakaway; Alternate Components for use with ORVR Vapor Vac and ORVR Wayne Vac Systems," dated August 30, 2007. In accordance with Title 30 Texas Administrative Code (30 TAC) §115.243(2), the system must be independently certified by a third-party. Mr. Bob McKinney of Ken Wilcox Associates, Inc., conducted the third-party evaluation.

The system tested for approval is the OPW 12VW Nozzle and 66 CAS Breakaway when used with the ORVR Vapor Vac and ORVR Wayne Vac 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 above described system and components, as applicable to existing or new installations, is **hereby approved as an ORVR Compatible Stage II system for use in Texas** when installed and operated in accordance with manufacturer recommendations.

If any further assistance is needed, you may call Koy Howard of my staff at (512)239-2306.

Sincerely,

A handwritten signature in cursive script that reads "D.C. Schanbacher".

David C. Schanbacher, P.E.
Chief Engineer

DS/KH/sy

Enclosure

OPW 12VW ORVR Nozzle and OPW 66CAS ORVR Breakaway
Alternate components for use with ORVR VaporVac and ORVR WayneVac systems

List of Critical Components

Attachment 1

The Gilbarco VaporVac system and the Dresser Wayne WayneVac system are vacuum assist Stage II vapor recovery systems that are available as factory installed options or field retrofit kits by each of the respective companies for their specified dispensers.

The Gilbarco VaporVac system is also available as a factory installed option or field retrofit kit on some Schlumberger dispenser product lines.

The Gilbarco ORVR VaporVac and the Dresser Wayne ORVR WayneVac systems previously evaluated by Ken Wilcox Associates, Inc. and the TCEQ use specially designed hanging hardware (nozzle, primary hose, breakaway & whip hose) to enable compatibility with ORVR vehicles. Ken Wilcox Associates, Inc. and the TCEQ have evaluated and approved the OPW 12VW nozzle and the OPW 66CAS breakaway as alternate components that can be used with the Gilbarco ORVR VaporVac and the Dresser Wayne ORVR WayneVac systems.

The following system components for VaporVac and WayneVac remain consistent with each manufacturer's approved specifications.

1. Control electronics and power supply
2. Vapor pump/motor assembly
3. Solenoid vapor valve on dispensers manufactured before 7/31/02. No solenoid vapor valve on dispensers manufactured after 8/1/02. (Gilbarco VaporVac only)
4. Hose outlet casting.

The following system components are new or modified for ORVR VaporVac and ORVR WayneVac applications:

1. Gilbarco, Inc. VaporVac and Wayne WayneVac systems – No new or modified components
2. ORVR Hanging Hardware:
 - Nozzle
 - OPW 12VW ORVR nozzle (part number 12VW-0XTX)
 - Veeder-Root ORVR nozzle (part number 900300-XXX)
 - VST ORVR nozzle (part number VST-VR-NAcc)
 - Primary Hose with ORVR Valve
 - Veeder-Root ORVR primary hose assembly (part number 900301-XXX)
 - VST ORVR primary hose assembly (part number VST-ISE-XXX-SS)
 - Breakaway (Reconnectable and Non-Reconnectable)
 - OPW 66CAS ORVR (part number 66CAS-0XTX)
 - Veeder-Root vacuum assist safety breakaway (part number 900302-XXX)
 - VST vacuum assist safety breakaway (part number VST-ISA-SBK & VST-ISE-SBK)
 - Whip Hose (with or without flow limiter)
 - Veeder-Root vacuum assist whip hose (part number 900303-XXX)
 - VST vacuum assist whip hose (part number VST-ISE-XXX & VST-ISE-XXX-FLO)