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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

November 22, 2005

Protecting Texas by Reducing and Preventing Pollution

Mr. Calvin Tanck
Veeder-Root Company
125 Powder Forest Drive
Simsbury CT 06070

RE: Veeder-Root ORVR Vehicle Compatibility System for Gilbarco VaporVac Stage II Vapor Recovery Assist System

Dear Sirs:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the final report entitled "Veeder-Root ORVR Vehicle Compatibility System for Gilbarco VaporVac Stage II Vapor Recovery Assist System" dated November 17, 2005. 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 tested for approval is a retrofit kit to make Gilbarco VaporVac system (CARB Executive Order G-70-150-AE) ORVR Compatible in Texas. The required components are listed in Attachment I. It is also required that the P/V vent cap maintain pressure within the range of, and open at, negative 8 inches water column and positive 2.5 to 3.5 inches water column.

In accordance with 30 Texas Administrative Code (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 above stated P/V valve parameters, manufacturers recommendations and applicable portions of G-70-150-AE.

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

Yours truly,

A handwritten signature in blue ink that reads "Roger S. Vaughan".

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

Gilbarco / Veeder-Root ORVR Vehicle Compatibility System For The Gilbarco VaporVac Stage II Assist System

List Of Critical Components

Attachment 1

The Gilbarco VaporVac System is a vacuum assist Stage II vapor recovery system that is available as a factory installed option or field retrofit kit on the following Gilbarco dispenser product lines:

1. Encore series (model numbers NXX - X can be any number or letter)
2. Eclipse series (model numbers EXX - X can be any number or letter)
3. Advantage series (model numbers BXX - X can be any number or letter)
4. MPD series (model numbers AYXXXX - X can be any number or letter / Y can be E, F, G, K, L, N, P, R or U)

The Gilbarco VaporVac system is currently approved by CARB Executive Order G-70-150-AE. The Gilbarco ORVR VaporVac system evaluated by Ken Wilcox Associates, Inc. and the TCEQ uses specially designed hanging hardware (nozzle, primary hose, breakaway & whip hose) to enable compatibility with ORVR vehicles.

The following system components are the same for standard VaporVac and ORVR VaporVac:

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.
4. Hose outlet casting

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

1. Gilbarco Inc. VaporVac System – No new or modified components
2. Veeder-Root ORVR Hanging Hardware:
 - Veeder-Root ORVR Nozzle (New), Part number 900300-(XXX)
 - Veeder-Root ORVR Nozzle (Rebuilt), Part number R900300-(XXX)
 - Veeder-Root ORVR Primary Hose Assembly (with ORVR/Relief Valve), Part Number 900301-(XXX)
 - Veeder-Root Vacuum Assist Safety Breakaway, Part Number 900302-(XXX)
 - Veeder-Root Vacuum Assist Whip Hose (with or without Flow Limiter), Part Number 900303-(XXX)

XXX = color, customer graphics, length or other option and can be any number 0 to 9 or any letter from A to Z