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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 3, 2007

Mr. Kevin Hughes
Global Product Manager, Air Quality Protection
Veeder-Root
125 Powder Forest Drive
Simsbury, CT 06070

RE: Veeder-Root ORVR Vehicle Compatibility System for Dresser Wayne's WayneVac Stage II Vapor Recovery Assist System

Dear Mr. Hughes:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the "Final Report For Veeder-Root ORVR Equipment Test Used with Dresser Wayne Dispensers and the WayneVac Vapor Recovery System," dated March 22, 2007. In accordance with 30 Texas Administrative Code (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. Mr. P.D. Kelly, P.E., independently certified the evaluation.

The system tested for approval is a retrofit kit to make Dresser Wayne's WayneVac system (CARB Executive Order G-70-153-AD) ORVR Compatible in Texas. The required components are listed in Attachment 1 of the Final Report and included as an enclosure to this letter. During operation, the system's P/V vent cap must have a vacuum relief at 8 inches of water column, and release positive pressure between 2.5 and 3.5 inches of water column as identified in Section 2.1 of the report.

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 the above stated P/V valve parameters, manufacturer recommendations, and applicable portions of G-70-153-AD.

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

Sincerely,

A handwritten signature in black ink that reads "D.C. Schanbacher".

David C. Schanbacher, P.E.
Chief Engineer

Enclosure

**Veeder-Root ORVR Vehicle Compatibility System For The Gilbarco VaporVac and
The Dresser Wayne WayneVac Stage II Assist 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, 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.

The system components for VaporVac and WayneVac systems 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 ONLY)
4. Hose outlet casting

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

1. Gilbarco Inc. VaporVac and Dresser Wayne WayneVac Systems – 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