Kathleen Hartnett White, Chairman Larry R. Soward, Commissioner Glenn Shankle, Executive Director



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 2, 2007

Mr. Glenn K. Walker President Vapor Systems Technologies, Inc. 650 Pleasant Valley Dr. Springboro, Ohio 45066

RE: Vapor Systems Technologies ORVR Vehicle Compatibility System for Dresser Wayne's WayneVac Stage II Vapor Recovery Assist system

Dear Mr. Walker:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the "Final Report For Vapor System Technologies, Inc., ORVR Vehicle Compatibility System for the Dresser Wayne Stage II Vapor Recovery Assist System," dated April 5, 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, please call Koy Howard of my staff at (512)239-2306.

Sincerely,

David C. Schanbacher, P.E.

Chief Engineer

Enclosure

DS/KH/mm

VST 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
- 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. VST ORVR Hanging Hardware:
 - VST ORVR Nozzle (New), Part number VST-VR-NAcc
 - VST ORVR Nozzle (Rebuilt), Part number VST-VR-NAccR

(cc)- color code

BK - Black

GN - Green

RD - Red

YL - Yellow :

BU - Blue

WH - White

Example- Green VST ORVR Nozzle (New), Part Number VST-VR-NAGN

- VST ORVR Primary Hose Assembly (with ORVR/Relief Valve), Part Number VST-ISE-(XXX)-SS (XXX)- Length of hose in inches Example- 8.5 ft VST ORVR Primary Hose, Part Number VST-ISE-102-SS
- VST Vacuum Assist Safety Breakaway, Part Number VST-IS(X)-SBK

(X) - Safety Breakaway Style

Examples: Reattachable - Part Number VST-ISA-SBK

Non-Reattachable – Part Number VST-ISE-SBK

- VST Vacuum Assist Whip Hose- With Flow Limiter, Part Number VST-ISE-(XXX)-FLO (XXX)- Length of hose in inches Example- 1ft. VST Vacuum Assist Whip Hose, Flow Limiter, Part Number VST- ISE-012-
- VST Vacuum Assist Whip Hose No Flow Limiter, Part Number VST- ISE-(XXX) (XXX)- Length of hose in inches

Example- 1ft. VST Vacuum Assist Whip Hose, No Flow Limiter, Part Number VST- ISE-012