

Georgia Department of Natural Resources

Environmental Protection Division, Air Protection Branch

4244 International Parkway, Suite 136, Atlanta, Georgia 30354

404/363-7028

Chris Clark, Commissioner

Carol A. Couch, Ph.D., Director

July 9, 2009

Mr. Brandon Grote
Product Manager
OPW Fueling Components
P. O. Box 405003
Cincinnati, OH 45240-5003

RE: OPW 21Gv™ ORVR Compatible Nozzle

The Environmental Protection Division (EPD) has received your request to introduce and use the OPW 21Gv™ nozzles at certain existing Stage II Vapor Recovery installations in Georgia. EPD staff has reviewed the request and associated documents including approval letters from the Texas Commission on Environmental Quality and Wisconsin Department of Natural Resources. We understand that the nozzle being introduced has not been certified in the older California Air Resources Board executive orders, which comprise most of the approved Stage II vapor recovery systems in Georgia.

EPD recognizes that CARB has discontinued certifying new components for older vapor recovery systems, particularly those certified prior to April 1, 2001. As a result, EPD previously amended the Rules for Air Quality Control for Gasoline Dispensing Facilities – Stage II to allow “mixing of equipment components certified under separate certification procedures ... when supported by manufacturer or independent third-party certification that the configuration meets or exceeds the applicable performance standards and has received prior written approval from the Division”.

Based on the information provided, EPD also recognizes that the OPW 21Gv™ nozzles are an improved design that will eliminate activation of the vacuum assist when refueling vehicles equipped with on-board refueling vapor recovery. This design will reduce the amount of air ingested into the vapor recovery system, which will result in less fugitive emissions from the stationary storage tanks located at the gasoline dispensing facilities.

Based on the documentation supplied to EPD by OPW concerning the OPW 21Gv™ nozzles, EPD has determined that the nozzles have been certified under separate certification procedures and has undergone manufacturer and third-party certification that indicate they will allow certain Stage II Vapor Recovery Systems to continue meeting or exceeding the applicable performance standards. As a result, EPD hereby approves the use of the OPW 21Gv™ nozzles when installed and operated in accordance with manufacturer’s recommendations and with specified hanging hardware or vacuum assist hoses (and related breakaways) as an alternate component system for use with the following approved Stage II vapor recovery systems:

Dresser/Wayne Wayne Vac – G-70-153 (latest), G-70-199 (previous)
Gilbarco VaporVac – G-70-150 (latest), G-70-199 (previous)
Tokheim MaxVac – G-70-154 (latest), G-70-199 (previous)

Please note the Stage II vapor recovery systems where this new nozzle is installed must continue to meet the applicable annual and certification test performance standards.

If you have any questions about this approval letter or have additional information that you would like to provide, please feel free to contact Bassey Udosen at 404-363-7050.

Sincerely,



William Cook, Unit Manager
Engines and Fuels Unit

CC: Shaheer Muhanna
Bassey Udosen
Parrish Evans
Reading File

WLC:bu