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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 1, 2006

Jim Lawrence
Emco Wheaton Retail Corp.
2300 Industrial Drive
Wilson, North Carolina 27893

RE: Emco Wheaton A4507 Nozzle with a Hirt Vent Processor for ORVR Compatibility

Dear Mr. Lawrence:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the third-party evaluation of the Emco Wheaton Nozzle with a Hirt Vent Processor and finds the system meets the state's requirements and is compatible with on-board refueling vapor recovery (ORVR).

The system that was evaluated consists of the Emco A4507 Bootless Nozzles; Emco A4110 Coaxial Hose Swivels; Emco A4119 Coaxial Safe Break Valves; Emco A4043 Coaxial Splitter Adapters; Husky 4885 Pressure/Vacuum Valve; Goodyear Maxxim Premier Plus 8 ft Coaxial Hoses with Liquid Removal Venturi; Goodyear Maxxim Premier Plus 10 inch Coaxial Whip Hose; and the Hirt VCS-200-MX Vapor Vent Processor. The system is further described in the evaluation and final report.

The third-party evaluation was conducted by Technology Resources International, Inc. in Wylie, Texas. The final report, the "Evaluation of the Emco Wheaton A4507 Nozzle with a Hirt Vent Processor for ORVR Compatibility," dated September 12, 2006, was prepared by Dr. Wolf H. Koch, of Technology Resources International, Inc.

In accordance with 30 Texas Administrative Code (TAC) §115.243, the above-described system or components, as applicable to existing or new installations, is hereby approved as a Stage II system for use in Texas when installed and operated in accordance with manufacturer's recommendations. In addition, the above-described system is approved as ORVR compatible in Texas under the current rule definition in 30 TAC §115.240(a)(2).

Sincerely,

Handwritten signature of David C. Schanbacher in dark ink.

David C. Schanbacher, P.E.
Chief Engineer

DS/KH/mj