



Linda S. Adams
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov



Arnold Schwarzenegger
Governor

November 7, 2007

#07-08

Mr. Bruce Bragg
National Accounts
Catlow, Inc.
2750 US Route 40
Tipp City, Ohio 45371

Dear Mr. Bragg:

Catlow submitted a request for approval of a cam mechanism feature incorporated entirely on the external surfaces of the Model IVC200S Inverted Coaxial Breakaway. This cam mechanism allows the customer to:

- Reconnect the breakaway following a drive-off;
- Separate the breakaway to conduct inspection of sealing surfaces and gaskets;
- Verify the proper operation of the internal components; and
- Apply lubricants to the seals to assure continued service

You submitted detailed drawings of the current and modified breakaway and an actual sample. This information was submitted to illustrate the extent of the modifications and provide a means for comparison to the certified Catlow IVC200S breakaway. Certification of a modified Catlow IVC200S breakaway, which does not meet Enhanced Vapor Recovery (EVR) standards, is allowed under section 19.3 of CP-201, Replacement of Components or Parts of a System with a Terminated, Revoked, Superseded, or Expired Certification.

Based on the submitted information, we determined that an engineering evaluation of the information provided, was sufficient to ensure the modifications do not affect the performance of the breakaway.

Approvals of the State agencies listed below, which are a precondition to approval by the Air Resources Board (ARB), have been received:

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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Department of Food and Agriculture
Division of Measurement Standards
Dated: July 12, 2007

Department of Industrial Relations
Division of Occupational Safety and Health
Dated: July 26, 2007

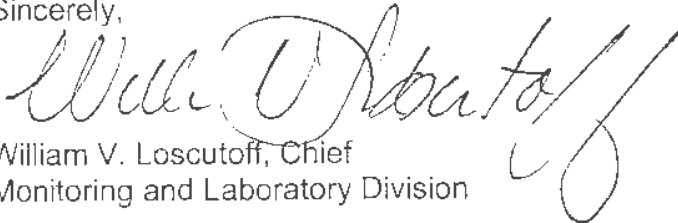
Department of Forestry and Fire Protection
Office of the State Fire Marshal
Dated: October 4, 2007

Given the information provided by Catlow, ARB staff has determined that the modifications, when installed in accordance with the manufacturer's installation and maintenance instructions, will not adversely affect the performance of the vapor recovery system.

The Catlow Model CTMVA Cam Twist breakaway is approved for use as a replacement part on Executive Orders G-70-204-A and G-70-209. This breakaway is an approved replacement component for these systems until April 1, 2009.

Should you have questions or need further information, please contact Oscar Lopez at (916) 323-1161 or via email at olopez@arb.ca.gov, or Pat Bennett at (916) 322-8959 or via email at pbennett@arb.ca.gov.

Sincerely,


William V. Loscutoff, Chief
Monitoring and Laboratory Division

cc: Jim Swaney
San Joaquin Valley Air Pollution Control District

John Marvin
Bay Area Air Quality Management District

Gary Ma
Yolo-Solano Air Quality Management District

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Randy Smith
San Diego County Air Pollution Control District