Terry Tamminen
Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Arnold Schwarzenegger
Governor

September 16, 2004

#04-04

Mr. David Imler, Design Engineer
Catlow
2750 U.S. Route 40
Tipp City, Ohio 45371

Dear Mr. Imler:

Thank you for your letter requesting California Air Resources Board (ARB) approval of a Catlow Model IVC200S re-connectable breakaway modification, as shown in the enclosed Figure 1. The IVC200S breakaway was approved by ARB through the issuance of approval letter number 98-19. The IVC200S breakaway is for use with Phase II vapor recovery systems that incorporate inverted coaxial hoses.

The modifications to the IVC200S breakaway affect the separation and re-connection characteristics without modification of the liquid and vapor paths. Changes by the submersible pump manufacturers have created premature separation issues. Additionally, modifications were necessary to eliminate high separation forces of units installed for an extended time period. The modifications involved adding an o-ring seal and changing an o-ring seal from female to male gland. The modifications include minor machining of the breakaway internals to prevent premature separation.

Based on information provided by Catlow, we find the use of the Catlow Model IVC200S re-connectable breakaway, when installed in accordance with the manufacturer's recommended instructions, will not adversely affect the vapor recovery systems on which they are installed. Therefore, the IVC200S re-connectable breakaway, is approved for use with the currently approved (pre-EVR) vapor recovery systems as per approval letter 98-19.

If you have questions or need further information, please contact Oscar Lopez at (916) 323-1161 or via email at olopez@arb.ca.gov.

Sincerely,

William V. Loscutoff, Chief
Monitoring and Laboratory Division

Enclosure

cc: See next page

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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cc: Mr. Lou Roberto
South Coast Air Quality Management District

Mr. John Schroeder
San Joaquin Valley Air Pollution Control District

Figure 1:
IVC200S Catlow Breakaway