STATE OF CALIFORNIA

PETE WILSON, Governor

AIR RESOURCES BOARD
2020 L STREET
P.O. BOX 2815
SACRAMENTO, CA 95812

September 18, 1995

Mr. George R. Cockram
Director of Retail Engineering
Emco Wheaton Incorporated
3800 Gateway Centre Boulevard
Suite 301
Morrisville, North Carolina 27560

#95-9-A

Dear Mr. Cockram:

Approval of the Emco Wheaton A1100 Series Two Point Drop Tubes

You requested California Air Resources Board (CARB) certification of the Emco Wheaton Incorporated Model A1100 Series two point overfill prevention type drop tubes. The A1100 Series drop tubes consist of the following model numbers.

A1100-010
A1100-055
A1100-056

I understand that Emco Wheaton has made several upgrades to the original A1100-004 drop tube (CARB approved on January 23, 1991, and listed in Approval Letter #91-1). The improvements made to the A1100-004 are as follows:

1. The two pivot pins at the bottom have been sealed permanently with an epoxy putty.

2. The actuating arms are sealed by means of a flexible membrane which allows the arms to seal against the leakage yet permit the arms to rotate as required. The material for the sealing membrane is viton rubber.

3. A viton rubber gasket has been added to the drain poppet at the top of the unit.

These modifications are reflected in the A1100-010, A1100-055, and A1100-056 drop tubes. The A1100-010 unit comes unassembled from the factory. Assembly of the upper and lower drop tubes onto the overfill prevention device is required in the field. The A1100-055 and A1100-056 models come partially assembled from the factory. On these units, the upper drop tube is connected to the overfill prevention device at the factory and

only assembly of the lower drop tube to the overfill prevention device is required in the field. The difference between the A1100-055 and A1100-056 units are the drop tube lengths.

The A1100 Series drop tubes are intended for use with two point Phase I vapor recovery systems. The units shall be installed in conformity with the manufacturer's instructions and all applicable codes.

As required by the Air Resources Board certification procedures, you requested the approval of the Division of Occupational Safety and Health, the Office of the State Fire Marshal and the Department of Food and Agriculture, Division of Measurement Standards. The necessary approvals have been obtained from these agencies.

I find that the use of the above listed A1100 Series drop tubes, when installed in accordance with the manufacturer's instructions, will not adversely affect the performance of vapor recovery systems on which they are installed. Therefore, the Emco Wheaton Incorporated Model A1100-010, A1100-055 and A1100-056 two point overfill prevention type drop tubes are certified for use with CARB approved two point Phase I vapor recovery systems. This letter supersedes and replaces Approval Letter #95-9.

Should you have any questions or need further assistance, please contact Mr. Basharat Iqbal at (916) 324-7343 or Ms. Laura Sullivan McKinney at (916) 327-1525.

Sincerely,

LSMcKinney
for
James J. Morgester, Chief
Compliance Division

cc: Mr. Kenneth Kunaniec, Chairman,
CAPCOA Vapor Recovery Committee

Mr. Gary Hunter, Manager,
CARB Compliance Assistance Section