



Jeremiah W. (Jay) Nixon, Governor • Mark N. Templeton, Director

## DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

DEC 23 2009

Mr. J. Jeff Holstead  
CompX Field Sales  
CompX Security Products  
P.O. Box 445  
Roach, MO 65787

### APPROVAL LETTER 2009-6

Dear Mr. Holstead:

This letter is to inform you and CompX Security Products, of the Missouri Department of Natural Resources approval of four models of the Tank Commander, for use in Missouri Stage II vapor recovery required gasoline dispensing facilities.

CompX Security Products requested MOPETP approval of their modified OPW dust caps that allow for secure locking of the product and vapor dust caps for security purposes. The modification to the dust cap products involves securing a locking device to the top of the cap. There is no penetration through the cap; thus, there is no impact on the tightness of the cap in relation to vapor releases. California Air Resource Board (CARB) has approved the modified dust caps for use with the OPW EVR Stage I System (VR 102-J) and Phil-Tite EVR Stage I System (VR 101-L).

The only product concerns raised during the engineering evaluation were (1) the Tank Commander increases the height of the dust cap space needed and (2) inspectors need access to the keys or combination padlock codes during inspections. The Technical Review Committee voted unanimously for engineering approval of the dust cap products listed in Table 1:

Table 1 List of MOPETP approved Tank Commander Products.

Manufacturer	CARB Identification and product marking	CompX Product Number	Description
CompX/OPW	CSP1-634LPC (product)	TC-1	Tank Commander with a keyed high security TuBAR lock for product port
CompX/OPW	CSP2-1711LPC (vapor)	TC-1-V	Tank Commander with a keyed high security TuBAR lock for vapor port (painted orange)
CompX/OPW	CSP3-634LPC (product)	TC-PL	Tank Commander with a user-settable combination padlock for product port
CompX/OPW	CSP4-1711LPC (vapor)	TC-PL-V	Tank Commander with a user-settable combination padlock for vapor port (painted orange)

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CompX produces each approved product as 4 ¼" height or 7" height for the locking shield to suit the particular installation. CompX also has the capability to produce additional product heights, as needed, to accommodate custom orders.

#### Approval Conditions

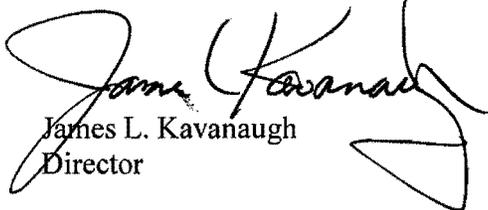
The approval of the CompX Tank Commander is conditional upon the following requirements:

1. See Table 1 for the list of approved Tank Commander products for all balance Vapor Recovery systems.
2. Stations and facilities must follow all installation and maintenance requirements provided in the CARB certifications including annual inspections of the dust caps.
3. State and local inspectors must have access to the (product and vapor) ports for inspection purposes. Specifically, stations and facilities using the Tank Commander shall, for purposes of inspections, make provisions to provide immediate access to key(s) and/or combination padlock code(s) upon request by state and local inspectors.
4. All requirements and conditions of the CARB 08-04 are adopted by reference.

Thank you for your cooperation in the MOPETP process. If you should have any questions about this approval, please contact Mr. Bob Randolph at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, by email at [bob.randolph@dnr.mo.gov](mailto:bob.randolph@dnr.mo.gov) or by telephone at (573) 751-4817.

Sincerely

AIR POLLUTION CONTROL PROGRAM



James L. Kavanaugh  
Director

JLK:brt

c: Vapor Recovery