

Matt Blunt, Governor • Doyle Childers, Director

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DEC - 1 2005

Owners/Operators  
Gasoline Dispensing Facilities  
St. Louis Non-Attainment Area

RE: Dust Caps, Vapor Port, Fill Port

### MOPETP APPROVAL LETTER 2005-1

Dear Owners/Operators:

After conducting an engineering evaluation, the Missouri Department of Natural Resources' Air Pollution Control Program is issuing a blanket Missouri Performance Evaluation Test Procedure (MOPETP) approval of all vapor port dust caps and fill port dust caps. This letter shall serve as the blanket MOPETP approval for all appropriate and well-maintained dust caps. The evaluation and resulting decision came after open discussions at a November 10, 2005, Vapor Recovery Advisory Group meeting, held at the Millennium Hotel in St. Louis, Missouri.

It was decided by the Vapor Recovery Advisory Group and the Air Pollution Control Program to submit a recommendation to the Air Pollution Control Program director due to the specific characteristic of the dust caps being a secondary seal and not the primary seal, visual observation by the inspector could suffice rather than submit all dust caps to extended MOPETP testing. This was done to increase the dust cap options of the station owners/operators, which have wide variation in tank riser situations.

Although this is a blanket approval, there are still certain conditions the vapor port and fill port dust caps must meet to achieve and maintain MOPETP Approval.

- 1.) They must be compatible with the vapor adapter and the product adapter (the cams must articulate properly with the groves in the adaptors) and
- 2.) They must seal properly, clamp tightly to the adaptor and,
- 3.) They must be vapor tight, having an appropriate and well maintained, well positioned gasket.
- 4.) The dust cap itself must be well maintained and in working order, with no cracks, chips, or broken parts.

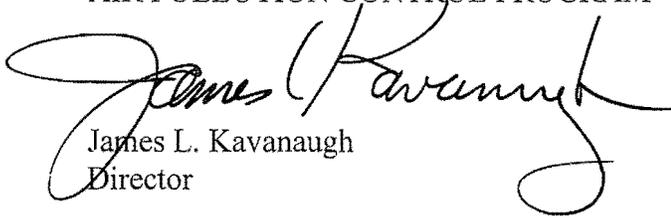
Your Stage II inspector is the final judge on whether your dust cap meets the above conditions. Dust caps not meeting all the above conditions will be issued a Notice of Excess Emissions and given up to fifteen days to be replaced or repaired and re-inspected by the Stage II inspector.

Owners/Operators  
Page Two

This blanket approval is effective immediately. If you have any questions regarding this letter you can contact me at the Air Pollution Control Program, P. O. Box 176, Jefferson City, MO 65102-0176, or by telephone at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



James L. Kavanaugh  
Director

JLK:bpd

c: Ms. Kathrina Donegan, St. Louis County Department of Health  
Mr. Bill Ruppel, St. Louis Regional Office  
Ms. Katina Stewart, City of St. Louis, Air Pollution Control