

DONALD R. VAN DER VAART Secretary

LINDA CULPEPPER

January 8, 2016

Richard and Douglas Long RDM Industrial Electronics, Inc. 850 Harmony Grove Rd Nebo, NC 28761

Re: Remanufactured Automatic Tank Gauge probes

Dear Mr. Long:

The Underground Storage Tank (UST) Section has determined that the remanufacturing process your company completes for Automatic Tank Gauge leak detection probes does not alter the probes original design and make the original third party certification invalid. This determination is based on the information discussed in the meeting at your facility and the approval request letter submitted that is dated 12/1/2015. In that discussion and on the letter you submitted you state that the components used in the remanufacturing process are obtained from the original manufacturer that supplied the components to the original probe manufacturer. As long as the remanufacturing process of the leak detection probes is conducted as discussed in the meeting and stipulated in the letter from your company dated 12/1/2015, the probes meet the leak detection requirements listed in federal regulation 40 CFR 280.45(a) (as incorporated by 15A NCAC 2N .0506) and as described in 40 CFR 280.40(a)(3) (as incorporated by 15A NCAC 2N .0501).

If you have any questions regarding this, please contact me at the address below, (336) 776-9684 or michael.phelps@ncdenr.gov.

Sincerely,

Michael Phelps, Environmental Supervisor Division of Waste Management, NC DEQ

Michael Phelips