

ROY COOPER  
Governor  
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MICHAEL SCOTT  
Director



NORTH CAROLINA  
Environmental Quality

March 17, 2023

Bob Shepard  
Freedom Electronics, LLC  
2205 May Ct NW  
Kennesaw, GA 30144

**Re: Remanufactured Automatic Tank Gauge probes**  
Veeder-Root probe models: 846390-XXX and 847390-XXX

Dear Mr. Shepard:

The NC DEQ UST section has received your request to transfer the remanufactured ATG probe approval previously provided to Esco Manufacturing Inc to Freedom Electronics LLC based on your statement that your company has purchased Esco Manufacturing Inc. The above remanufactured ATG probe models marketed by Freedom Electronics LLC are approved for use in North Carolina as long as the requirements listed below from the original Esco Manufacturing Inc approval have not changed.

Original Esco Manufacturing Inc approval from 6/15/2020:

The Underground Storage Tank (UST) Section has reviewed your request for approval of the remanufactured ATG probe models listed above. In your request you state that all components used in the remanufacturing process are either OEM or meet the original specifications of the OEM components. As long as the components used in the remanufacturing process are either OEM or meet the original specifications of the OEM components; the probes are not altered from their original design that would cause them to no longer meet the original third party certification; and they are tested to function as originally designed, then the remanufactured Veeder-Root probe models listed above are approved for use in North Carolina and can be used to 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, please contact me at the letterhead address, (336) 776-9684 or michael.phelps@ncdenr.gov.

Sincerely,

A handwritten signature in black ink that reads "Michael Phelps".

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

cc: Files



North Carolina Department of Environmental Quality | Division of Waste Management  
217 West Jones Street | 1646 Mail Service Center | Raleigh, North Carolina 27699-1646  
919.707.8171