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Solutions for Over 20 Years

Date: 11/01/11
Subject: Addendum to 01/02/07

ARM-4073

Catastrophic Line Leak Detection Testing

AST-4010
AST-4012

To Whom It May Concern:

ISM-4080
ISM-4081

To comply with Federal Statutes the following requirements must be satisfied:
40 CFR 280.44 Methods of Release Detection for Piping

LD-2000
LD-2000\E

"Each method of release detection for piping used to meet the requirements of § 280.41 must be conducted in accordance with the following:"

LD-2200
LD-2200\75

Automatic Line Leak Detectors

LD-3000
LD-3000\E
LD-3000\FL

- 1) "Methods which alert the operator to the presence of a leak by restricting or shutting off the flow of regulated substances through piping or triggering an audible or visual alarm"
- 2) "May be used only if they detect leaks of 3 gallons per hour at 10 psi line pressure within one hour."
- 3) "An annual test of the operation of the leak detector must be conducted in accordance with the manufacturer's requirements."

LDT-890
LDT-890\AF

Vmi's requirements for Annual and Post-Installation Testing of Catastrophic Line Leak Detection for MLLD's and ELLD's are met using the LDT-890 and LDT-890\AF Leak Detector Testers. Testers must pass the Certification Test for the **Vmi** LDT-890(\AF) Leak Detector Tester and recertify every two years.

OFF-211
OFF-212

OFF-311
OFF-312

PLC-5000

SUMP-300

STM-4201

Additional equipment and personnel certified as meeting **Vmi's** requirements for Catastrophic Line Leak Detection Testing are identified by field personnel holding a current **Vmi** "Authorized Catastrophic Testing Technician" certification status card, issued by Vmi, recertified every two years.

Vaporless Manufacturing, Inc.

8700 E. Long Mesa Drive, Prescott Valley, Arizona 86314
800-367-0185 928-775-5191 Fax: 928-775-5309
Email: vmi@vaporless.com Web Site: www.vaporless.com

Certified testers and equipment are listed online at www.Vaporless.com. Updates monthly, contact factory for questions.

This test and equipment is specific to **Vmi** MLLD and ELLD and is also applicable to any mechanical or electronic line leak detection system insofar as manufacturer guidelines do not exclude this method or equipment for generating catastrophic leaks.

Vaporless Manufacturing (Vmi) offers two levels of online self-paced Certification.

- **Certification Test For Installing & Replacing VMI Mechanical Line Leak Detectors**
- **Certification Test For The VMI LDT-890 Leak Detector Tester**

Both are available at www.vaporless.com

Vmi has adopted the following Certification Testing Fees as of November 1st, 2011:

For each **Vmi** LDT-890 or LDT-890\AF Leak Detector Tester purchased, the certification fees will be waived for two technicians. Each technician may test and receive certification for "Operation of **Vmi** LDT- 890 Leak Detector Tester for Catastrophic Leak Test" and "Install and Replace **Vmi** Mechanical Line Leak Detectors."

Technicians seeking certification for "Operation of **Vmi** LDT-890(\AF) Leak Detector Tester for Catastrophic Leak Test" will be charged \$125 per certification. Technicians installing leak detectors only may elect to test for "Install and Replace **Vmi** Mechanical Line Leak Detectors" for \$75 per certification.

Each certification is valid for two years. In order to apply for certification for "Operation of LDT-890(\AF)" the technician must have a currently calibrated LDT-890(\AF). **Vmi** will certify up to four technicians per LDT-890(\AF).

Other Equipment Recognized by Vmi For Catastrophic Line Leak Testing

Vaporless Manufacturing, Inc. has adopted a formal program to certify equipment not manufactured by **Vmi**. It is reviewing applications to evaluate equipment and testing standards from other line leak detection equipment manufacturers and other non line leak detection equipment vendors to provide **Vmi** approval of qualified equipment and testing protocols.

Vaporless does not recognize the Red Jacket FX Tester as an acceptable piece of equipment for generating catastrophic (3 GPH @ 10 PSI) line leaks or for being used to perform annual testing of Vaporless Mechanical Leak Detectors, for a variety of reasons, including: (1) the FX Tester's inability to compensate for the viscosity of the fuel being tested and (2) the inability of the operator to verify the flow (leak) rate at 10 PSI as per EPA Regulations.

Additionally, according to publicly disseminated information, Red Jacket does not "condone" the use of the FTA or the FX Tester on any leak detector not manufactured by Red Jacket.

Sincerely,

Greg Young

President

Vaporless Manufacturing, Inc.

Vaporless Manufacturing, Inc.
8700 E. Long Mesa Drive, Prescott Valley, Arizona 86314
800-367-0185 928-775-5191 Fax: 928-775-5309
Email: vmi@vaporless.com Web Site: www.vaporless.com