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Vaporless Manufacturing, Inc.  
8700 E. Long Drive  
Prescott Valley, AZ 86314

**RE: THIRD PARTY APPROVAL  
FIELD EQUIPMENT TO TEST MECHANICAL LINE LEAK DETECTORS  
VAPORLESS MODEL LDT-890 LEAK DETECTOR SYSTEM**

Under EPA CFR and California Statutes of Chapter 6.7 Health and Safety Code line leak detectors are required to be installed on all pressurized lines carrying hazardous substances and to be tested annually.

Mechanical line leak detectors are required to be certified by a Testing Laboratory under established protocols.

However nothing has been established for the verification of the continued performance of the mechanical line leak detector installed in the field.

I have examined and reviewed the following items on the Vaporless Model LDT-890 Leak Detector Testing System:

- VMI Leak Detector 890 Tester
- VMI Test Protocol – LDT 890 Leak Detector Tester.
- VMI LDT 890 Conversion Chart
- VMI LDT 890 Test Form
- VMI Mechanical Line Leak Detector Annual Test Requirements
- VMI Technical Bulletin 060700, Manifolded Piping Systems and Leak Detection Solutions
- VMI Installation Instructions for VMI Line Leak Detectors 99 LD – 2000,2200 and 3000.

Upon review of the materials and my own years of experience with the design and operations of petroleum piping systems, it is my opinion and conclusion that:

- Sound engineering design and materials have gone into this system.
- The Vaporless Model LDT-890 Leak Detector System will evaluate the installed operating performance of any make of mechanical line leak detector being tested to meet annual catastrophic line leak detection (3 GPH @ 10 psi) requirements.

*James H. Ray*  
James H. Ray  
Senior Civil Engineer



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