

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

AI: 176772

Mr. Andrew B. Voda
President
Lokring Gulf Coast, LLC
7519 Martin Bluff Road
MS 39553

RE: Request for approval regarding the Elastic Strain Preload (ESP) technology used in Lokring pipe and tubing fittings

Dear Mr. Voda:

The Louisiana Department of Environmental Quality (LDEQ) received the above referenced request dated May 16, 2012. Lokring is requesting that the LDEQ recognize ESP technology and Lokring pipe and tubing fittings, when manufactured, installed (per Lokring Technology's LP-105 Installation Procedure), and maintained in accordance with the manufacturer's procedures, as joints that are at minimum equivalent to a welded joint, and therefore exempt from any and all monitoring requirements for purposes of fugitive emissions as specified in LAC 33:III.2121 and 2122.

Lokring fittings are permanent, all metal to metal, zero leakage, and ASME B31 code qualified as weld equivalent connections. Lokring's ESP technology has been recognized by the California Air Resources Board (CARB) as the equivalent of a welded joint. This recognition was granted due to extensive testing that includes pressure-torsion, temperature, flexural fatigue, stress intensification factors, and fire testing.

The LDEQ has reviewed the provided information and determined Lokring's ESP technology is at minimum equivalent to a welded joint and exempt from the fugitive emissions monitoring requirements of LAC 33:III.2121 and 2122. If you have any questions about this review, please contact Timothy Bergeron at (225) 219-3410.

Sincerely,

A handwritten signature in blue ink that reads "Tegan B. Treadaway".

Tegan B. Treadaway
Administrator

6/5/12
Date

TBT:tb