National Work Group on Leak Detection Evaluations (NWGLDE) Meeting San Antonio, Texas: May 12-14, 2015

Tuesday, May 12, 2015

A complete list of meeting attendees for the sessions is included at the end of these minutes.

TEAM UPDATES

ATG & VTTT TEAM - Lamar Bradley

I. Completed Reviews

ATG:

- Listing name change for Alert 1000, 2000, and ullage tests from Alert to Purpora Engineering- February 2015
- Added FMP-LL3 probe to Franklin Fueling T1, T5, and Colibri listings-February 2015
- VR TS4/8601 Series console and 8463 Magnetostrictive probes- February 6. 2015
- Patriot Sensors (Magnetek) now AMETEK equipment declared obsolete in 2005, listing updated- April 16, 2015.

VTTT:

 Listing name change for Alert 1000, 1050 and 1050 X NVTTT Ullage tests from Alert to Purpora Engineering- September 30, 2014

II. <u>Under Review</u>

ATG:

 Received ATG console comparison for VR TLS-450 and TLS-450PLUS with 8600 series console- April 21, 2015.

VTTT:

- Received Alert 8200 series evaluation on 2-4-15; Marcia reviewed 2-19-15. Sent to Curt 3-9-15. 3-30-15 sent to Chris Ramshaw re: listing for levels lower than 50% (only 2 tests done at 16%). No lower level protocol for VTTT- team working on it.
- Chris Ramshaw sent Alert 2000XB and asked why it was not approved Reply sent 2-24-15

III. Other Activity

- Received info concerning new OMNTEC models OEL8000III with several Proteus versions-No evaluation received, however, Craig Wilcox says they are done, but reports not written as of 3-19-14.
- Nothing done with ATG 0.1 gph listing issues since last time. Low priority item. Will be submitting revisions for the following:
 - 1. USTest 2001 and 2001 Quick Test- No Action
 - 2. VeederRoot Prolink System, RJE Probes #RE-400-094 thru 112-5 after contacting VR. This will conclude the project. Can be reopened later if necessary.

CITLDS TEAM – Shaheer Muhanna

- I. Completed Review
 - Added CSLD to TS-5000evo via console comparison with previous approved TS-550evo SCALD system- February 13, 2015
 - Added VR 8600 and 8601 series console CSLD listings- February 13, 2015
- II. Under Review
 - No activity
- III. Other Activity
 - No activity

NVTTT TEAM – Helen Robbins

- I. Completed Review
 - No activity
- II. Under Review
 - Provided comments on Tanknology's Vacuum Spill Container Test.
 Tanknology responded they may not continue seeking listing of this method depending on the new EPA regulations.
- III. Other Activity
 - No activity

LLD TEAM – Greg Bareta

- I. Completed Review
 - Added 8590 DPLLD TO 8600 series (TLS-450) console- March 31, 2015
- II. <u>Under Review</u>
 - No activity
- III. Other Activity

No activity

SIR TEAM – Lamar Bradley

- I. Completed Review
 - Updated TeleData SIR version listing showing version 4.1. Program rewritten in C# language reviewed by Bob Mitchell (SIR International)-April 16, 2015.

II. Under Review

No activity

III. Other Activity

 Proposal to work group for development of policy on a formal process for submitting evaluations where the only change was to a more modern programming language.

INTERSTITIAL MONITORING and OUT-of-TANK DETECTOR METHODS TEAM – Tim Smith

Interstitial Monitoring Completed Review

- Oklahoma Environmental Services (originally listed as, Arizona Instrument Corp., then NESCO, and then Summit Holdings, Inc. – Oklahoma Environmental, Inc.). Revised listings with company name change March 24, 2015
 - Soil Sentry Liquid 330 (17-330-A/17-330-B), TLM-830,
 ENCOMPASS APAM with Probes 17-141A, 17-142A, 17-143A, 17-144A
 - Soil Sentry Twelve-X

Interstitial Monitoring Under Review

- Franklin Fueling: NWGLDE was asked to list TSP-DMS 12 and 24 inch
 Discriminating Magnetostrictive Sensors with E85. Team partially
 completed request by listing the TSP-EIS (Opto-electric); TSP-ULS (Float
 Switch); and TSP-UHS (Float-Switch) with E85. Information unavailable
 to list the other types of sensors for E85 at this time.
- OPW: NWGLDE completed partial listing posted on April 9, 2012 for the iSite, iTouch, and EECO Series Fuel Management Systems with OPW Intelligent Sensor (and Company Equivalent) 30-231-S, 30-0230-S (30-3221-1A/1B, Q003-009); 30-0231-L (30-3221-2); 30-0323-D-10/D-30/D-10B/D-20B (Q0003-001/002); and the 924B Sump Sensor. Company also requested NWGLDE list various sensors with ethanol blends E10, E15, and E85. All float switches have been listed. Information unavailable to list the other types of sensors at this time.
- Pneumercator Company, Inc: Requested NWGLDE list the following:

- Reservoir sensor models RSU810 Single-Float, and RSU800 Series Dual Float with Console Models LC1000 Series, LC2000 Series, E-700-1, LDE-700, LDE-740, TMS3000, TMS2000, TMS2000W, TMS1000 Series.
- Non-Discriminating Liquid Float-Switch Sensor models LS600 Series, LS600-LD Series, and LS610 with Console Models LC1000 Series, LC2000 Series, E-14, E-29, E700-1, LDE-700, LDE-740, TMS3000, TMS2000, and TMS2000W Series.
- Steel Tank Institute: NWGLDE was asked to revise the listing for Permatank Interstitial Monitor for Detection of Air and Liquid Leaks – Interstitial Tank Tightness Test Method. The group was also asked to add a new combined listing for the STI-P3® Act-100® and ACT-100U® Double Wall Steel Underground Tanks Interstitial Monitor for Detection of Air & Liquid Leaks. The submittals have been back with STI for rework since April 2, 2013. NWGLDE has answered subsequent questions from STI in correspondence dated April 15, 2013, May 1, 2013, December 12, 2013, and in-person on September 10, 2014. NWGLDE is awaiting resubmittals from STI.
- Tank Tech, Inc: Requested review of Braddock Method by Tank Tech using vacuum on the interstice of an In-situ upgraded tank. The test procedures used in the field are not the test procedures that were thirdparty evaluated. The manufacturer and the third-party evaluator have been informed that this discrepancy will need to be resolved before NWGLDE can take any further action.

III. Other Activity

No activity

ABOVEGROUND AND BULK STORAGE TANK METHODS TEAM - Peter Rollo

- I. Completed Review
 - No activity
- II. Under Review
 - No activity
- III. Other Activity
 - No activity

SECONDARY AND SPILL CONTAINMENT TESTING METHODS TEAM – Shaheer Muhanna

- I. Completed Review
 - No activity
- II. Under Review
 - No activity

III. Other Activity

No activity

LIST ADMINISTRATION TEAM - Curt Johnson

- Scanned historical documents from Bill Moore was transferred via portable hard drive to Tim Smith for retention.
- David Wilson will contact the NWGLDE web hosting service and see if there
 is an easy way to upload the 16 GB of existing historical files to the website.
- The workgroup discussed and developed the following revision to Workgroup General Team Procedure in accordance with existing NWGLDE Policy Memo #3, Sub-section I.O.:
 - O. Upon workgroup approval and posting of the new evaluation on the NWGLDE website, the lead reviewer will send a copy of all files associated with the review (submittal request, 3rd party docs., general correspondence, final listing with changes highlighted, company literature) to the webmaster and cc NWGLDE Chair. Prior to sending to the webmaster, the files will be renamed using the following convention:

"method.companyname.typeofcorrespondance.dateofNWGLDEapproval"

Types of correspondence key: .console. .sensor. .GenCorr. .3rdEval. .Colit.

REVIEW OF TEAM ASSIGNMENTS

Heather Peters appointed to Team Leader for Line Leak detection; Greg Bareta and David Wilson designated team members.

VENDOR PRESENTATIONS

- A SECOND OPINION Cal Hodge Renewable Hydrocarbon Diesel (RHD): What it is and how it is made: Mr. Hodge provided an overview of renewable hydrocarbon diesel fuel in relation to the ASTM D975 standard and the fact that the D975 standard is a diesel fuel standard and not a "petroleum" diesel standard. RHD can be can now be made from biomass feedstocks, and most states will accept it as long as it meets the D975 standard and is compatible with storage system materials, including leak detection equipment.
- ENVIRONMENTAL CONSULTANT Sam Gordji
 Renewable Diesel and it's effect on Tanks, Lines, and Equipment in the
 Tanks.

Mr. Gordji presented the results of research he has performed on the compatibility of storage tank materials with RHD. The majority of his information was based on published research documents from Neste Corporation, a world-wide supplier of RHD. There is not much data available, but RHD is expected to be less aggressive than biodiesel/conventional diesel. As far as leak detection functionality, performance is anticipated to be comparable to conventional diesel.

- TANKNOLOGY Kevin Keegan with Brad Hoffman Secondary Containment Testing Processes Not planning to perform 3rd party evaluations on secondary containment testing equipment unless EPA were to require a minimum detectable leak rate.
- VEEDER ROOT Dave Emmington
 Remanufactured Leak Detection Components
 Showed examples of Veeder-Root equipment that they found had been remanufactured by others.

Wednesday May 13, 2015

Discussion of Presentations

A SECOND OPINION – Cal Hodge

Following his presentation Mr. Hodge requested the workgroup add a definition of renewable diesel to the NWGLDE Glossary. The NWGLDE decided to revise our diesel definition on our website so that it encompasses renewable and all other types of diesel that meet ASTM Standard D975 as follows:: "Hydrocarbon Oil that may contain up to 5% biodiesel in accordance with the current edition of ASTM Standard D975".

ENVIRONMENTAL CONSULTANT- Sam Gordji

While the workgroup was overall accepting of Mr. Gordji's research, one of the leak detection manufacturers was questioning how the coefficient of expansion would be affected if RHD was mixed with conventional diesel (50/50; 25/75, etc.). Mr. Hodge stated that he believes as long as the specific gravity of the final product was known it should be okay. The workgroup requested that Mr. Hodge and Gordji investigate this potential issue further and get back to us.

 Tanknology - Kevin Keegan, Brad Hoffman No comment

• Veeder Root- Dave Emmington

The workgroup already has policies in place that addresses the issue of remanufactured equipment via the Disclaimer section of the NWGLDE Policy and Requirements for review of 3rd-party evaluations.

NEW BUSINESS

- Applicability statement will be taken off each individual listing and put in General Disclaimer. Dave will send draft out to everyone for review.
- Proposed adding requirement for specifying type of fuel used when evaluating water sensors in ATG Listings since this may differ if water sensor was tested with ethanol blended fuel. – Workgroup decided this was already addressed in web page general disclaimer.
- Operating packages versus consoles and listings- Heather will followup for next meeting.
- Bulk Modulus in relation to piping. Main issue is how do we list combined length of hybrid piping in relation to combined system bulk modulus.- Heather will request additional information from Veeder Root.
- Bulk piping in relation to large diameter piping. Due to new EPA regulation definition of bulk piping, pipelines less than 50,000 gallons evaluation will be performed using the Standard Test Procedures for Evaluating Leak Detection Methods: Pipeline Leak Detection Systems", EPA/530/UST-90/010, September 1990 as long as it meets the 3.0 gph, 0.2 gph, and 0.1 gph criteria. Based on this new definition, Heather will revise existing listings affected by the definition change and send out to work group for comment. Top of revised listing page needs note explaining change.
- Addition of probe and console comparison guidelines to Policy and Procedures – Lamar to send to Tim for incorporation into Policy and Procedures
- Addition of Chairperson duties to Policy and Procedures.- Curt will send out a draft for review.
- Alert 8200 wants to be listed for low-level testing. We are currently developing a procedure for VTT low-level testing

Thursday May 14, 2015

OLD BUSINESS

 Second revision of draft EPA Protocols from Battelle reviewed by workgroup. Internal OUST review in process for format and readability; when OUST review complete will send to all stakeholders for final content review.
 Suitability Assessment and 5 protocols estimated to be finalized by June 2016.

- Suitability Assessment dated June 2014 will be posted to the web site; Tim Smith will provide link to the workgroup.
- No action on proposed New Protocol for Vacuum Testing the interstice of double wall tanks.
- Discussed use of 3rd party limited evaluations for software change verification for SIR programs. Lamar will develop Policy/Procedure after consulting with statisticians for required number of tests.
- Curt identified the need for listing the ATG low-level testing procedure in the ATG protocol list.
- LUSTLINE article Future articles:
 - o Incorporation of Large Diameter piping into Bulk category.
 - Changes to protocols:
 - Bulk tank and piping EPA threshold
 - Low-level VTTT testing
 - Renewable Hydrocarbon Diesel within the scope of ASTM D975. (collaborate with ASTM)
 - Inability to use listings for compatibility evaluation.
- Next Meeting is scheduled for Phoenix following the National Tanks Conference on September 16-18, 2015.
- Future meeting:
 - We will submit three locations to NEIWPCC for a Spring, 2016 meeting:
 - a. Kansas City, MO or
 - b. Albuquerque, NM; or
 - c. Charleston, SC.
 - 2. Meeting to be held the week of April 4, 2016 or April 11, 2016.
- Lamar Bradley will take minutes at the next meeting.

Adjourn

ATTENDANCE LIST

National Work Group on Leak Detection Evaluations

San Antonio, TX May 12, 13, 14, 2015

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