

Don Taylor (Chair) - Introductions of existing members and guests. Opening statement included welcoming members and guests and a discussion of the minutes from the previous meeting.

Minutes were discussed, but not yet finalized.

Team Leader Updates:

1. Peter Rollo – Volumetric Tank Tightness Testing
 - a. Completed Reviews: None
 - b. Under Review:
 - i. Pneumercator - requested to update console from analog to digital, comparison needed. Discussion as to whether or not to require new evaluation
 - ii. Purpora – Wanted to add ballast water to listing. Peter Rollo does not recognize water as an acceptable test method before fuel has been put in the tank, however Don Taylor said it would work if properly calibrated and Craig Wilcox on Ken Wilcox and Associates said it would be acceptable.

2. Shaheer Muhanna – SIR
 - a. Completed Review:
 - i. ASIS Automation – FOX SIR Versions 1 and 2, listed May 16, 2019
 - ii. AIUT Ltd – Fuel Prime ITC Version 2.4, listed August 13, 2019
 - b. Under Review:
 - i. Fuel Prime ITC Version 3.2
 1. Works differently than version 2.4 as it uses the ATG to collect data.
 2. The vendor wanted it listed under CSLD, but Shaheer classified it as SIR.

Don Taylor mentioned an old method that was evaluated in 2014 but only recently submitted for review. Craig Wilcox suggested it should be re-evaluated and Tim Smith added that the new EPA protocols covered new sections and therefore newly listed methods should be evaluated with the new protocols. Decision was tentatively made to set a “sunset” date for the old protocols and not allow any methods to be evaluated using the old protocols. Old protocols would be reclassified as “legacy”.

3. Wesley McCain – Non-Volumetric Tank Tightness Testing
 - a. Completed Review:
 - i. Leighton O’Brien - Dry Pressure Decay Test, listed March 27, 2019
 1. Very minor changes from an older version
 - b. Under Review: None

4. Greg Bareta – Line Leak Detection Methods
 - a. Completed Review:
 - i. ATMOS International – Pipeline Leak Detection System, listed September 30, 2019
 1. Had to compare performance to EPA standards
 2. Listing revised because method could not meet EPA 3.0 gph threshold above~142,000 gallons, this comes into effect 10/13/2021
 - ii. Hansa Consult of North America – ACNA Pressure Step Leak Detection System, Version 2.2, listed July 30, 2019
 1. Only needed a date change in the disclaimer, this has been done.
 - b. Under review:
 - i. CORE Engineering Solutions Safe Site Vacuum Interstitial Monitor
 1. Review started with IMOTD Team

2. Used the Flora Method Protocol-under review for proper protocol.
 3. Don Taylor is translating the numbers from the evaluation results, a draft listing is complete
5. Tim Smith - Interstitial Monitoring and Out of Tank Detector
- a. Completed Review:
 - i. PMP Corporation PMP Piping Sump Sensor 63228 and 63229 as evaluated with the Veeder-Root TLS-350 (software version 11.02), listed May 28, 2019
 - ii. Veeder Root:
 1. Secondary Containment Leak Detection (SCLD) TLS-450Plus and TLS-350/ProMax/EMC Console with Vacuum Sensors 857280-100, 200, 30x, or Assembly 332175-001, added October 29, 2019
 2. Secondary Containment Leak Detection (SCLD) TLS-350/ProMax/EMC Console with Vacuum Sensors 857280-100, 200, 30x, or Assembly 332175-00, revised October 28, 2019
 - b. Under Review:
 - i. Integrated Control Systems - SD1-SP and SD1-DP Safety Disconnect Liquid Sensor
 1. Liquid Phase interstitial Detector
 - ii. PID Analyzer, LLC – Vapor Phase Interstitial Detector
 1. KWA, as requested by Bill Strohmman, submitted letter on August 8, 2018 to NWGLDE. It requested testing results for diesel, Jet-A, and Aviation gas be added to its existing listing. Results were an addendum to the “Evaluation of the PID Analyzers Model 102 Photoionizer Detector for Measuring Hydrocarbon Concentrations, October 10, 2004.”
 - iii. Pneumercator Company, Inc – Liquid Phase Interstitial Detector
 1. Basic listing of several sensors with various consoles. Review Evaluation of Pneumercator Tamper-Resistant, Non-Discriminating (-T) and Discriminating (-FT/-FT) Liquid Float-Switch Leak Sensors
6. Peter Rollo - Above Ground and Bulk Storage Tank Methods
- a. Completed Review: None
 - b. Under Review: None

Pete sent an email that said methods did not meet EPA requirements, and nothing came of it. Discussed whether or not to separate methods on the website that do/do not meet requirements.

7. Greg Baretta – Secondary and Spill Containment Test Methods
- a. Completed review:
 - i. Leak Detection Technologies, LLC - MCleak Enhanced Interstice Test for Doubled-Walled Tanks, UDCs, Sumps and Spill Buckets, listed July 3, 2019
 1. 1/4 inch change over 24 hours v/s normal 1/8 inch in an hour
 - b. Under Review: None

Administrative:

1. Don Taylor Proposed creation of additional administrative position to keep track of the reviewed/received list. Would be elected position tentatively called “Document Officer”
2. Oma Gilbreth was working on getting document scanning done in-house.
3. Tim Smith made a change to the policies and procedures trying to incorporate the 2019 protocols. Need Checklists from the team, but that can be done as the teams work through new evaluations. Tim will sent clean, updated version to Don Taylor and Dave Wilson.
4. Group wanted to add “Date Evaluation Received” and “Date of Complete Submittal” to the master spreadsheet

Old Business:

1. Greg Baretta – commented on OPW loop system (and associated non-sloped flex piping). His state requires secondary testing every 2 years because piping is not sloped.

2. Master list – suggested creating a google drive/one drive/ drop box to allow members to access the master review list easier
3. Website upgrades- 2 options for possible website upgrages:
 - a. Have NEIWPCC host our website on their website.
 - i. Could lose appearance of autonomy
 - ii. Would have to work out how to administer the site with NIEWPCC
 - b. Commercial redesign
 - i. Costs money we do not currently have
 - ii. NIEWPCC might be able to get a grant from EPA to contract someone to redesign website
4. Alternative Fuels – study titled “Suitability of Leak Detection Technologies for use in Ethanol Blended Fuel Service” provided chart of equipment compatibility with ethanol blended fuels. Each te4am could consider making their own table similar to this one, or simply use this one and make a call to accept evaluations as they are or seek further evaluations. Could also just list exceptions, methods that absolutely do not work, and methods that would need further evaluation.

New Business:

1. Team member re-assignments: team members were reassigned to reflect current workload
2. Oma Gilbreth – discussed a manifold release in Wyoming discovered in April 2019. DW Tank and lines, tank and line tightness tests passed, inventory control records showed no alarms, ELLD showed 2 days of passes for the lines, and liquid statues was normal. Cause was suspected to be a failed check valve in a pressurized manifold.
3. LUSTLine Articles - 2 possible articles and potential future topics
 - a. SIR Clarification, correcting a 2017 article. Threshold level should be based on performance standard (0.2 gph) as opposed to making SIR more stringent by basing it on MDL. The initial article said to use the MDL as the leak threshold, and this value will change based on the data and make SIR more stringent than other methods. Article should clean up language for SIR. Sidelined until EPA completes updated compendium
 - b. Notification that workgroup will review containment sump testing methods. States can then approve those methods for use in their programs. Could also ends up in compendium. Article is currently ready to go.
 - c. Future topics:
 - i. Leak detector testing requirements
 - ii. Remote monitoring
 - iii. Field maintenance issues that cause failures
4. Group came up with potential announcement on homepage – “Beginning on Jan 1, 2020, we will no longer review any evaluations done using the old EPA protocols.” Old protocols would be moved to an archive. Could still use older protocols on a case by case basis as 2019 protocols do not cover every single situation.
5. Spring 2020 Meeting Discussion – Group votes to hold meeting at Source University Inspector Training facility in Arlington, TX with Savannah, GA as potential alternative.

Updates/Discussion Topics:

1. Tim Smith discussed a Polish tank tightness test method that was certified in Poland using Polish standards and wanted to be listed as an equivalent methods in the US. Tim clarified that an evaluation must be done according to the EPA protocols.
2. Tim Smith discussed comparing the old EPA protocols to the ne 2019 protocols to see where the new ones may be necessary over the old ones.
3. The group discussed the validity of manufacturer methods for interstice testing and noted that they are not required to be 3rd party evaluated. It is a potential gap in requirements when the PEI codes say to use the manufacturer instructions, but the manufacturer does not have any. In that scenario, the burden falls to the states, but we could possible approach the manufacturers to encourage the development of these methods. Likely falls outside of NWGLDE mission however. It is definitely outside of our mission to ask anyone to get a method evaluated – that burden falls on states as well.

4. The group discussed how airports and other sites with hydrant fueling systems are reconfiguring to avoid the 10% underground regulatory threshold.
5. Discussions about EPA 2015 regulation updates to emergency generator tank leak detection. Questions included language from NFPA stating that valves may not be placed in supply/return lines and what actually constitutes a regulated emergency generator tank system. Tim Smith said he would check with headquarters and clarify.
6. The group discussed an issue on the website concerning the Airport Hydrant System and Field Constructed Tanks piping page, it is hidden under the Large Pipelines section. Suggestions were made to clarify this.
7. The definition of large diameter pipeline may need to be changed and the section needs a note that some methods do not meet the 2015 EPA requirements and clarification as to why the methods are sorted.
8. The group discussed low liquid level sump testing. Peter Rollo expressed strong opposition to this method.
9. The group discussed the benefits of vendors bringing equipment to meetings to demo; decided it was beneficial and would like to encourage vendors to bring more equipment to demo in the future.

ATTENDANCE LIST
 National Work Group on Leak Detection Evaluations
 Seattle, WA
 October 23, 24 and 25, 2019

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