NWGLDE Meeting – October 11-13, 2017 (Nashville, TN)

Team Leader Update:

Don Taylor- ATG & VTTT Methods.

ATG completed review:

- None to report

ATG under review:

- Franklin Fueling EVO200 and EVO400 Monthly Monitoring 20,000 gallons was submitted for listing October 9, 2017. Third party evaluation was conducted by KWA October 5, 2017 per ATG protocol.
- Franklin Fueling EVO200 and EVO400 Monthly Monitoring 30,000 gallons was submitted for listing October 9, 2017. Third party evaluation was conducted by KWA October 6, 2017 per ATG protocol.

VTTT Completed reviews:

- FAFNIR VISY-X Systems VTTT (underfill) has been listed. This system is the only method using a magnostrictive probe that is listed to conduct VTTT.

VTTT under Review:

- Leighton O'Brien Tank Integrity Wet Test was submitted for listing August 8, 2017. Third party evaluation was conducted by KWA December 1, 2016 per VTTT protocol.

NVTTT Methods – Jason Cocke

NVTTT Completed Reviews:

- None to report.

NVTTT Under Review:

- Leighton O'Brien (Ullage) Test was submitted for listing August 8, 2017. Third party evaluation was conducted by KWA December 1, 2016 per NVTTT protocol.

Shaheer Muhanna CITLDS Method:

- Franklin Fueling EVO200 and EVO400 SCALD 3 CITLDS ATG system Monthly Monitoring was submitted for listing October 2017. Third party evaluation was conducted by KWA August 25, 2017 per CITLDS protocol.
- The third party evaluation was approved and will be listed soon.

Don Taylor- Line Leak Detection Methods

- **Did we not have anything on piping?**

Shaheer Muhanna- SIR Method.

- Fairbanks Real Time Reconciliation Alarm for Continuous Monitoring of Underground Storage Tanks was submitted January 23, 2017. Third party evaluation was conducted by KWA January 13, 2017 per SIR protocol. It was returned to the owner because it does not meet the new 2015 UST Federal Rules.

Tim Smith-Interstitial Monitoring and Out- of- Tank Detector Methods.

IM and Out-of-Tank Detector Under Review:

- Steel Tank Institute
  - The submittals have been returned to STI for rework.
  - EPA's revised and combined Volumetric and Non-Volumetric Tank Tightness Test Method will cover testing procedures that address the release detection approaches involved in the two STI methods.
- Tank Tech, Inc.
  - The manufacturer and third-party evaluator have been informed of discrepancy with original evaluation. Evaluation to be revised and resubmitted.
- Veeder-Root
  - The team has partially completed the request to list results for various sensors with new Veeder-Root ATG consoles. The company has requested information on results with testing in ethanol blends be added to two listings under development.

List of Sensors:

Veeder-Root Model/Form Number	Type	Comments
794380-208	Non-Discriminating Piping Sump Sensor (12 ft. cable)	
794380-209	Non-Discriminating Piping Sump Sensor (30 ft. cable)	
794380-301	Single-Float Hydrostatic Reservoir Sensor	
794380-303	Dual-Float Hydrostatic Reservoir Sensor	
794380-304	Single-Point Mini Hydrostatic Sensor for double-wall sumps	
794380-320	Solid-State Discriminating Dispenser Pan Sensor	
794380-320	Solid-State Dispenser Pan Sensor	

794380-322	Discriminating Dispenser Pan Sensor	
794380-323	Position Sensitive Pan/Sump Sensor (12 ft. cable)	
794380-323	Position Sensitive Interstitial Sensor for Steel Tanks	
794380-343	Solid-state Interstitial Liquid Sensor for Fiberglass Tanks	
794380-344	Interstitial Micro Sensor For Steel Tanks	Draft being revised to include results from testing with ethanol blends.
794380-345	Interstitial High Alcohol Sensor for Double-Wall Fiberglass	Draft being revised to include results from testing with ethanol blends.
794380-350	Solid-State Discriminating Containment Sump Sensor	
794380-351	Solid-State Containment Sump Sensor	
794380-352	Discriminating Containment Sump Sensor	
794380-420	Interstitial Steel Tank Sensor	
794380-430	Position Sensitive Interstitial Steel Tank Sensor	
794380-460	Interstitial Steel Tank Sensor (30 ft. cable)	
794380-621	Groundwater Sensor 7' to 10' wells	
794380-622	Groundwater Sensor 10' to 15' wells	
794380-624	Groundwater Sensor for 15' to 20' wells	
794380-700	Vapor Sensor	
857060-XXX	Mag Sump Sensor	
857080-XXX	Mag Sump Sensor	

IM and Out-of-Tank Detector Completed Review:

- **Franklin Fueling Systems**
  Incon TS-1001/2001, TS-5, TS-550, TS-5000, TS-550 evo, TS-5000 evo, EVO400, EVO200, and S940 Alarm Console with FMP-ULS Universal Liquid Sensor, FMP-UHS Universal Hydrostatic Sensor, FMP-ULS-C Universal Liquid Sensor Chemical, FMP-ULS-PS Universal Liquid Sensor Position Sensitive sensors
  Added to Interstitial Detector (Liquid-Phase) Method August 7, 2017
- **Franklin Fueling Systems**
  Franklin Fueling Systems EVO400, EVO200 with FMP-DDS-U Discriminating Dispenser Sump Sensor and FMP-DTS-U Discriminating Turbine Sump Sensor
  Added to Interstitial Detector (Liquid-Phase) Method August 7, 2017
- **Franklin Fueling Systems**
  Franklin Fueling Systems EVO400, EVO200 with FMP-DIS-U Discriminating Interstitial Sensor and FMP-EIS-U Electro-Optical Interstitial Sensor

Added to Interstitial Detector (Liquid-Phase) Method August 7, 2017

- **Franklin Fueling Systems**
  Franklin Fueling Systems EVO400, EVO200 with FMP-HIS-U Hydrostatic Interstitial Float Sensor, and FMP-HIS-XL-U Hydrostatic Interstitial Float Sensor
  Added to Interstitial Detector (Liquid-Phase) Method August 7, 2017

Peter Rollo- Aboveground and Bulk Storage Tank methods.

- Peter will send out a letter about some additional testing for Vista. Vista will provide the modification table with the correction about the PS, MDLR and TH. There has been no additional activity regarding this team.

Marcia Poxson-Secondary and Spill Containment Test methods.

- The only method the group has had is Patent Pending DPleak™ Leak Detection and Leak Location Method.

  Leak Detection Technologies originally sent in test results for the 0.05 gph leak rate. At that time, it was discovered that they had not submitted the 0.1 gph leak rate documents for review. When the 0.1 gph leak rate documents were received, it was determined that one listing with both rates would be the best way to list them.

  The review has been completed by the task group and is being sent to the workgroup for final approval.

Heather Peters-Administration.

Heather requested the reassignments for the teams due to Marcia's retirement. The new team assignments are listed in the chart below.

Team Assignment

• **Automatic Tank Gauging (ATG) and Volumetric Tank Tightness Test (VTTT)**	Mike Juranty	~~Marcia Poxson~~ Don Taylor Peter Rollo
Continuous In-Tank Leak Detection Methods	Shaheer Muhanna	Jason Cocke
Non-Volumetric Tank Tightness Test Methods	Mike Juranty	Jason Cocke
Line Leak Detection Methods	Don Taylor	David Wilson Greg Bareta

Statistical Inventory Reconciliation (SIR)	Shaheer Muhanna	Jason Cocke
Interstitial Monitoring and Out-of-Tank Detector Methods	Tim Smith	~~Jason Cocke~~ Shaheer Muhanna ~~Marcia Poxson~~ Don Taylor Peter Rollo
Aboveground and Bulk Storage Tank Methods	Peter Rollo	Greg Bareta ~~Marcia Poxson~~ Tim Smith
Secondary and Spill Containment Test Methods	~~Marcia Poxson~~ Jason Cocke	Tim Smith Mike Juranty David Wilson
List Administration	Heather Peters	David Wilson Helen Robbins

The Bulk Modulus listing:

The group discussed the listing of the Bulk Modulus and the decision was made as follows:

Existing listing: If a vendor wants to update his listing, he needs to run an additional 6 tests for each threshold (TH) listed in the 2015 EPA rules (does not have to be at the "fullest" volume).

New listing: Vendor should run 6 tests for each threshold.

Tim will draft a letter to notify vendors of the modification of the protocol. The piping team will review the letter before distribution.

Airport Hydrant systems:

Several Airport Hydrant release detection systems listed in the NWGLDE do not meet all of the EPA 2015 rule requirements. Several vendors listed in NWGLDE's List of leak detection evaluations will need to re-evaluate their listings to meet each piping segment volume range identified in the EPA Rule, if they choose. Vendors should run 6 tests for each threshold (TH) listed and a total of 36 tests for each listing.

Old data provided to NWGLDE prior to EPA establishing performance standards in the 2015 federal UST regulations can be used. If new data is needed, vendors should provide the data to the Aboveground and Bulk Storage Tank Methods Team to be evaluated in accordance with the requirements.

For applicable current Hydrant systems listed, NWGLDE will provide language to notify potential users that the method does not meet all federal regulatory requirements: "These methods were not evaluated at leak rates which are now in 40 CFR 280.252 of the 2015 EPA UST regulations."

On the Hydrant systems a new language will be added to the listing notifying users that the lists DO meet the certification requirement: "These methods were evaluated at leak rates which are now in 40 CFR 280.252 of the 2015 EPA UST regulations".

SIR listing

New language will be added to the listings indicating that the calculated threshold (TH) *of the analyzed data* should be listed on the compliance report. Additionally, the TH should be one-half the value of the data set calculated minimum detectable leak rate (MDLR).

Continuous Interstitial Monitoring Method (liquid)

Heather indicated that some methods in this category do not have any criteria of pass or fail.

Jason will take the lead to determine the reason.

Meeting with several vendors concerning MDLR and Calculated TH

Shaheer suggested that all applicable method vendors and third party evaluators should comply with the same criteria of calculating the MDLR and the TH for listed methods. Vendors should calculate the MDLR and list the TH for his method as one-half the value of MDLR. NWGLDE will work with vendors and third party evaluators in the near future to develop more consistency in this regard.

File retention

Heather will send a reminder to the group to send all documents and correspondence to David after the team and NWGLDE has completed its review and formally listed a new or revised method.

Electronic Manual Listing

Heather indicated that she is keeping track of all changes and it will be updated at the end of the year.

New protocol of AHS/FCT

Adding Calibration to the listing

The NWGLDE voted and agreed to add method calibration information if the vendor provides it with the third party evaluation.

Status of removal of fuel disclaimer from the website. Done

Implementation of new protocols in the future.

Once EPA issues their revised test protocols, the tester should submit any modification(s) to the protocol to the NWGLDE for approval. The group will add the modification to the protocol, most likely, as an appendix.

- Old historic protocols will no longer be allowed to be used.
- Any amendment to the protocol should be added to the relevant EPA revised protocol.
- New listings should list the protocol that the vendor used and the third party evaluator.
- Each NWGLDE will periodically review current protocols and note if there are any modifications required. If modifications are required, NWGLDE will bring them to EPA's attention for review and subsequent potential publishing of revised protocols.

Future meetings

Due to numerous changes as a result of the 2015 revised federal UST regulations and forthcoming release of EPA's revised test protocols on the NWGLDE's mission, Heather suggested that the NWGLDE begin to raise relevant issues during the public session. This will allow the group to keep vendors informed of necessary changes, discuss potential impacts, and obtain vendor input to factor into subsequent group decisions. Heather will redouble efforts to contact the local UST program during our meeting in their state with a more targeted request to increase involvement among release detection vendors in that jurisdiction.

Articles

Shaheer drafted two articles. The first article is about SIR. The second article is a comparison between SIR, ATG, and CITLD. Heather and Tim are in the process of reviewing the articles.

Policy review

Policies will be reviewed and updated in the next meeting at Raleigh, NC.

ATTENDANCE LIST
National Work Group on Leak Detection Evaluations
Nashville, TN
October (11), 12, and (13), 2017

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