

NWGLDE Meeting – April 11-13, 2018 (Raleigh, NC)

Welcome NWGLDE Members and Visitors: Welcomed new member Wesley McCain with the Mississippi Department of Environmental Quality, Underground Storage Tank Division.

Team Leader Update:

1. Mike Juranty - ATG & VTTT Methods

ATG completed review:

- Franklin Fueling EVO200 and EVO400 Monthly Monitoring 20,000 gallon has been listed.
- Franklin Fueling EVO200 and EVO400 Monthly Monitoring 30,000 gallon has been listed.

ATG Under Review:

- Franklin Fueling request for guidance regarding EVO 600/6000 listing/evaluation requirements on March 8, 2018. NWGLDE replied requesting more information on March 9, 2018 (reminder 4/9/2018).

VTTT Completed Reviews:

- Leighton O'Brien Tank Integrity Wet Test (Underfill) has been listed.

VTTT Under Review:

- None.

2. Shaheer Muhanna - CITLDS Methods

- None.

3. Mike Juranty - NVTTC Methods

NVTTC Completed Reviews:

- Leighton O'Brien Dry (Ullage) Test has been listed.

NVTTC Under Review:

- CGRS Inc. iotaVision Leak Detection Method (Tracer) Test submitted for listing March 16, 2018. Third party evaluation conducted by KWA August 17, 2017 per NVTTC protocol.
- ACTv2 Water Sensor for NVTTC (Vacuum) submitted for listing March 28, 2018. Third party evaluation conducted by KWA March 5, 2018 per Liquid Level Sensors 1996 protocol. NWGLDE replied for more information March 28, 2018.

4. Don Taylor- Line Leak Detection Methods

- Purpora, Petro Tite – Owner asked workgroup to revise the listed test period for accommodating multiple lines. The workgroup requested additional information and clarification from the Purpora.

5. 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 Rule thresholds.

6. 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 since April 2013. The Work Group has answered subsequent questions from STI in correspondence dated April 15, 2013, May 1, 2013, and December 12, 2013. As of late 2016, STI was still interested in completing this effort. No further information.
 - Revise the listing for Permatank Interstitial Monitor for Detection of Air and Liquid Leaks – Interstitial Tank Tightness Test Method
 - 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
- Tank Tech, Inc.
 - Review Braddock Method using vacuum on the interstice of an In-situ Upgraded Tank.
 - Method was evaluated using Non-Volumetric Tank Tightness Test Method (Vacuum). Tank Tech (Braddock Method).
 - Misunderstanding on inches of mercury vacuum and Tank Tech will meet with KWA.
 - The manufacturer and the third-party evaluator have been informed that this discrepancy will need to be resolved before NWGLDE can take further action.

IM and Out-of-Tank Detector Completed Review:

Veeder-Root Model/Form Number	Type	Added Where and When to List
794380-208	Non-Discriminating Piping Sump Sensor (12 ft. cable)	Interstitial Detector (Liquid-Phase) November 27, 2017
794380-209	Non-Discriminating Piping Sump Sensor (30 ft. cable)	Interstitial Detector (Liquid-Phase) November 27, 2017
794380-301	Single-Float Hydrostatic Reservoir	Interstitial Detector (Liquid-Phase) November

Veeder-Root Model/Form Number	Type	Added Where and When to List
	Sensor	27, 2017
794380-303	Dual-Float Hydrostatic Reservoir Sensor	Interstitial Detector (Liquid-Phase) November 27, 2017
794380-304	Single-Point Mini Hydrostatic Sensor for double-wall sumps	Interstitial Detector (Liquid-Phase) November 27, 2017
794380-320	Solid-State Discriminating Dispenser Pan Sensor	Interstitial Detector (Liquid-Phase) December 21 2017
794380-322	Discriminating Dispenser Pan Sensor	Interstitial Detector (Liquid-Phase) December 21, 2017
794380-323	Position Sensitive Pan/Sump Sensor (12 ft. cable)	Interstitial Detector (Liquid-Phase) November 27, 2017
794380-333	Position Sensitive Interstitial Sensor for Steel Tanks	Interstitial Detector (Liquid-Phase) November 27, 2017
794380-343	Solid-state Interstitial Liquid Sensor for Fiberglass Tanks	Interstitial Detector (Liquid-Phase) December 21, 2017
794380-344	Interstitial Micro Sensor for Steel Tanks	Interstitial Detector (Liquid-Phase) December 21, 2017
794380-345	Interstitial High Alcohol Sensor for Double-Wall Fiberglass	Interstitial Detector (Liquid-Phase) December 27, 2017
794380-350	Solid-State Discriminating Containment Sump Sensor	Interstitial Detector (Liquid-Phase) December 21, 2017
794380-351	Solid-State Containment Sump Sensor	Interstitial Detector (Liquid-Phase) December 21, 2017
794380-352	Discriminating Containment Sump Sensor	Interstitial Detector (Liquid-Phase) December 21, 2017
794380-420	Interstitial Steel Tank Sensor	Interstitial Detector (Liquid-Phase) November 27, 2017

Veeder-Root Model/Form Number	Type	Added Where and When to List
794380-430	Position Sensitive Interstitial Steel Tank Sensor	Interstitial Detector (Liquid-Phase) November 27, 2017
794380-460	Interstitial Steel Tank Sensor (30 ft. cable)	Interstitial Detector (Liquid-Phase) November 27, 2017
794380-621	Groundwater Sensor 7' to 10' wells	Interstitial Detector (Liquid-Phase) November 27, 2017
794380-622	Groundwater Sensor 10' to 15' wells	Interstitial Detector (Liquid-Phase) November 27, 2017
794380-624	Groundwater Sensor for 15' to 20' wells	Interstitial Detector (Liquid-Phase) November 27, 2017
794380-700	Vapor Sensor	Interstitial Detector (Liquid-Phase) November 27, 2017
857060-XXX	Mag Sump Sensor	Interstitial Detector (Liquid-Phase) November 27, 2017
857080-XXX	Mag Sump Sensor	Interstitial Detector (Liquid-Phase) November 27, 2017

7. Peter Rollo- Aboveground and Bulk Storage Tank methods

AST Under Review:

- DPLeak (0.1gph) AST Test Method, third party evaluation KWH dated February 1, 2018. The Workgroup discussed the test scale use in the evaluation. Workgroup will request more information from vendor and evaluator in regard to scale.

8. Jason Cocke - Secondary and Spill Containment Test methods

SSCT Completed Reviews:

- Leak Detection Technologies LLC, Differential Pressure Leak Test – DPLeak has been listed.

SSTC Under Review:

- Fueling and Service Technologies (FASTECH) – Vacu-Tite & Heli-Tite submitted for listing December 12, 2017.

9. Heather Peters - Administration

- Vacancy: Workgroup will advertise prior to the National Tanks Conference and suggest that interested parties attend the workgroup meeting following the tank conference.
- Team reassignments were conducted due to Jason’s promotion. The new team assignments are listed in the chart below.

Team Assignment

Automatic Tank Gauging (ATG) and Volumetric Tank Tightness Test (VTTT)	Mike Juranty	Don Taylor Peter Rollo
Continuous In-Tank Leak Detection Methods	Shaheer Muhanna	Wesley McCain
Non-Volumetric Tank Tightness Test Methods	Mike Juranty	Don Taylor Wesley McCain
Line Leak Detection Methods	Don Taylor	David Wilson Greg Bareta
Statistical Inventory Reconciliation (SIR)	Shaheer Muhanna	Greg Bareta
Interstitial Monitoring and Out-of-Tank Detector Methods	Tim Smith	Shaheer Muhanna Don Taylor Peter Rollo
Aboveground and Bulk Storage Tank Methods	Peter Rollo	Greg Bareta Tim Smith Wesley McCain
Secondary and Spill Containment Test Methods	Greg Bareta	Tim Smith Mike Juranty David Wilson
List Administration	Heather Peters	David Wilson Helen Robbins

Old Business:

- 1. Remanufactured Equipment – Tim.** No further news or developments.
- 2. File retention committee, status of scanning and retention of files – Dave, Helen.** Scanning and cataloging of new files and legacy files continue at a pace that time allows. Team leaders were

reminded to send all documents to Dave and Helen after it has completed its review and formally listed the new or revised method.

3. PAP Manual update/ requests to teams – Tim. Most of the team updates have been drafted, they just need to be compiled and entered into the manual.

4. Electronic Annual Listing Creation – Dave, Heather. The workgroup has only heard positive reviews on the e-publishing of the annual listing update vs. the propagation of a rolling master listing. The workgroup intends to continue this new procedure.

5. Review Line Leak Detection for AHS and FCT – Don, Tim, Heather. It was discussed that the AHS and FCT pipeline leak detection parameters cited in the revised Federal regulations are more precise than the thresholds evaluated for when the currently listed test methods were third party evaluated. The applicable Work Group Policy Memo and the Policies and Procedures Manual do not allow revising the existing listings to cover the more precise leak thresholds without additional third party evaluation of performance with the smaller induced leaks. It was further determined that historical data from owner's evaluations is not an acceptable substitution for a third party evaluation. Per policy, an additional 6 tests for each threshold not already evaluated for would have to be run.

In the interim, and at the National Tank Conference to be held in Louisville in 2018, the workgroup will advise states to allow existing listings until such time as the needed low threshold evaluations can be conducted, reviewed, and if acceptable listed by the workgroup.

6. Review SIR listings (and new regs) – Tim, Shaheer. 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).

7. Interstitial Monitoring protocols issues – Mike. It was discussed that some additional revisions are being considered for the interstitial methods portion of the new protocols. When the draft revisions are ready they will be reviewed by the NVTTC team.

8. Status of removal of fuel disclaimer from listings – Dave. Complete.

9. Implementation of new protocols in future – Tim, Heather. Because publishing of the new protocols is imminent, the new protocols are currently being made available to third party evaluators for all future evaluations. The draft protocols will receive a final review by the workgroup over the summer and then will be rolled out by EPA at the National Tanks Conference in Louisville this September (NTC). Once published, the new protocols will be effective and new evaluations conducted per the old protocols will not be accepted.

Once published, proposed revisions to the new protocols will be catalogued, reviewed, and brought to EPA's attention by the workgroup. Only EPA will publish revisions or addendums to the new protocols.

10. Public meeting presentations – Heather. Preparations were made for conducting the public session.

11. Links webpage – Heather, Dave. It was decided that because the resources linked on the work group webpage are also maintained by other organizations such as NEIWPC that have greater resources than the workgroup, and because the workgroup members do not have extra time for maintaining the links, that the links webpage would be deleted.

New Business:

1. Policy Review (Review Policy #1 and #2) – Heather. Completed.

2. Plan to review policies – Heather. Implemented.

3. Any other listing to review associated with new regulations. CITLDS, AHS, and FCT identified.

4. Any other changes to consider? – Any member.

5. Tank Tightness Testing method index – Heather, Wesley. It is recognized that the majority of listed tank tightness test methods were developed for and evaluated in single wall tank systems. Now however many of these test methods are being used for the primary portion of double walled tanks. Is the test method valid for use in such tanks? Starting with existing listings for NVTTC/vacuum test methods, this issue will be explored. Setup conditions that may need to be employed for a double wall tank to make the test valid, such as opening the interstitial cap for a primary tank vacuum test, or accounting for groundwater for a brine filled interstice, will be explored with the method owners and added to the listings if applicable. The NVTTC Team will begin this study and it is anticipated that other listing categories will also need to be explored.

6. Travel / Meeting Agenda Issues (how will we do next meeting) – Heather. It was suggested to explore the possibility of the implementing agency is the state hosting the meeting to provide meeting facilities at no cost to NEIWPC. It was recognized that due to the late start Thursday following the NTC that the workgroup would need to continue to 3 PM on the Friday of the Fall meeting.

7. Lustline articles – Tim, Heather. The CITLDS article is nearly completed. It wraps up how the new Federal rules affect operations and listings. We are also looking into a discussion of the listing volume limitations based on third party evaluation vessel size. Is "2x" the test volume acceptable?

An introduction of the new protocols could be the next article.

8. RP 100 updates – Peter.

9. RP 1200 updates – any changes to spill/secondary containment listings.

10. New piping categories? Standard for piping types – Heather, Piping Team. No new piping categories were identified, keeping the current categories at least for now.

11. Webpage maintenance / program – Dave, Heather. The workgroup is exploring the possibilities of developing a new front page. The current page is archaic and cannot be fixed. As the website is funded out of pocket by the workgroup members, cost will be a controlling parameter.

12. Webpage Fee Collection - \$179 – Heather. Completed.

13. Old evals, old protocols, new listing – Heather.

14. Spill & Secondary Containing testing methods – Heather, Tim.

15. Vacuum Testing – Primary tank vs. interstice and methods – Heather. Continuous interstitial monitoring methods are being reviewed for applicability, setting pass/fail criteria, and determining appropriate refresher rates. Future evaluation reviews will be completed by the Interstitial Monitoring and Out-of-Tank Detector Methods team.

16. Tank vs. vessel testing and the protocols – Tim. The term “component” is being added to the VTTT/NVTTT protocol with the intent to cover evaluations of spill and secondary containment test methods in that protocol.

ATTENDANCE LIST

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 National Work Group on Leak Detection Evaluations
 Raleigh, NC
 April 11, 12, and 13, 2018

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