

Minutes of Meeting of the National Work Group on Leak Detection Evaluations  
Phoenix, AZ September 16-18

Vendor Session presentations

**Dr. Jerry Flora** (representing KWA Associates) gave a presentation on bulk modulus (B), which is a measure of elasticity of piping. The more rigid the piping, the higher the B value; the more flexible the piping, the lower the B. Piping with lower B is harder to test. B/V (volume of a given pipeline) defines the relationship between pressure and volume for a given line. Flora said it is possible this relationship could be a basis for determining the applicability of line tests to a given volume in product piping regardless of piping construction. It was also suggested that it would be ideal to measure the B/V for each product line and use that in ELLD setup rather than standard factory values.

**Jon Marinas** (JMM Global) asked questions concerning the validity of data provided from ATG consoles collected by remote monitoring services (RMS) and provided to inspectors. Marinas said unless RMS are certified, that tank owners have the opportunity to manipulate results. Marinas requested that the NWGLDE consider certification of all RMS systems as part of the leak detection system and that all RMS be required to meet certain minimum requirements.

**Howard Dockery** (Simmons Sirvey) gave a presentation on the features of an ATG data collection and storage system called Smart Site. This system does not produce leak detection results; but collects information and can archive it as well as provide reports to owners and other end users.

**Greg Young** (Vaporless Manufacturing) raised questions on sump and spill containment test methods. He asked about protocols for determining what was an appropriate detection level for these methods and whether any were listed. He said that the 1/8" level drop in industry lake test standards was too lenient for a test method and contrasted some other method sensitivities to that standard.

Heather Peters thanked the speakers and reviewed the process for any vendors wishing to make presentations to the group and reminded attendees if the process was not followed, the NWGLDE was not obligated to honor their request to make a presentation.

**Day 2**

Discussion began with structuring the vendor portion of the meeting. Lamar had prepared modifications to Policy Memo #4 requiring submissions of presentations to the Chair prior to WG voting to hear a presentation. There was a wording change suggested and agreed to and the WG voted to approve the modifications. Lamar will edit Policy Memo #4 and submit to Heather.

Bulk modulus- some vendors do not wish to be limited to volumes of product in listings shown as rigid piping X gallons and flexible piping Y volume; they want the total of X+Y regardless of piping type based on bulk modulus. This only applies to ELLDs. Some members were not comfortable with this; Greg wanted to think about it. Heather agreed to contact VR for more information, and will redraft the listing for review. If the WG agrees with this change, Heather will contact Franklin Fueling and OPW to gauge their interest in a similar listing change.

The WG discussed RMS and decided that these are not part of leak detection and determined that certification of RMS is beyond the scope of the WG.

The presentation of the Simmons Smart site was informative, but not part of leak detection and beyond the scope of the WG.

Curt pointed out that there is a protocol for sump and spill containment test methods and there is one method listed. There was no set threshold for declaring a leak when this method was evaluated. Now the new federal rules acknowledge industry standards, manufacturers test methods, or methods acceptable to the implementing agency as test methods. Threshold for declaring a fail for these methods will vary.

Team Leader updates:

**ATG/ VTTT (Lamar)**

VR for TLS-450 and TLS-450 PLUS with 8600 Series console draft listing prepared, but WG has concerns about numbers of combinations of equipment on listing and increasing confusion for end users.

Alert 8200 VTTT- Received revised Evaluation 9-14-15. WG will vote on protocol for low level testing for VTTT, and if approved, will resume review of evaluation.

Nothing received on OMNTEC models OEL8000III Proteus.

Lamar will try to resolve two old ATG 0.1 listing issues before leaving the WG next year.

**CITLDS (Shaheer)**

Expects to receive a new CITLDS from Franklin fueling next week.

**NVTTT (Helen)**

Nothing completed or under review at this time.

**Line Leak Detection (Heather)**

Nothing to report other than the bulk modulus Veeder Root issue which she is working on.

**SIR (Lamar)**

Had contact from Danny Brevard, AC'CENT Environmental Services who was encouraged to contact KWA concerning an evaluation of a SIR system he has developed.

Lamar will talk to Bob Mitchell about developing methodology for SIR revisions following TeleData example and try to have by spring meeting.

**Sensors (Tim Smith)**

Franklin Fueling did evaluation with water /ethanol mixtures (old protocol used pure product, not water/ ethanol mixtures. Reviews completed for adding various test results for ethanol and ethanol/water blends to several Incon sensor listings. OPW has done something similar and these are still under review.

Two Franklin Tank Sentinel sensor listings were modified to reflect addition of waste oil.

Pneumercator has submitted two sensors for review.

STI Permatank IM- submittals have been back at STI since April, 2013 and answered subsequent questions from STI. Will ask Lorri what she wants to do and they do not move forward, will drop from under review.

Tank Tech (Braddock Method). Misunderstanding on inches of mercury vacuum and Tank Tech will meet with Craig Wilcox.

Veeder Root agreed to provide Tim a list of consoles compatible with the 409 sensor. The new and old models differ and the listings need to be clear to the public.

#### **Bulk Methods (Peter)**

David Rabb has something he will be sending Pete.

#### **Secondary & Spill Containment (Shaheer)**

Nothing at this time.

Lamar had a handout of the Under Review list although it has not been updated. Lamar will send the Access Under Review database file to everyone.

Heather has taken responsibility for the website server; future payments will be to Heather to maintain the server. There is also a domain name fee about \$10.00.

Curt asked if we still wanted to maintain a hard copy of our list, since he is concerned about the hard copy being identical with the website list. Curt went through individual listings in the hard copy and compared with the website. Curt will try to update the hard copy for 2016 and hand off to Heather.

Curt discussed the WG response to Cal Hodge concerning renewable diesel. It was pointed out that we modified our definition to include "hydrocarbon oils".

Following discussion, it was agreed to add something about confidentiality to policy Memo #4 along with other agreed changes. Lamar will draft and send to group for review.

#### **Listing Issues**

The group discussed ATG console, probe, and sensor listings and that over time many changes have been made in equipment and we have added to existing listings. Does this practice circumvent evaluations of specific combinations of equipment that may be in use? Greg suggested that maybe we take a look at the Wisconsin list as a model since they have addressed this in their list. The WG still needs to come up with a means of addressing this matter.

We discussed whether we should specify conditions when a letter from an evaluator would suffice for listing a leak detection component and where a full evaluation would be required and we decided to leave that up to the evaluator for the time being.

Heather said the WG has been inconsistent in listing ELLDs with ATG consoles, and there was discussion about how to list various combinations. Heather suggested a new label for listing consoles like Hardware or Console Applicability and suggested that vendors could create a matrix for their equipment combinations. Greg said the Wisconsin list also used a matrix.

Heather agreed to follow up with NEIWPCCC concerning the sending out of travel approval letters following a lot of complaints from WG members. Heather said we must get our information to NEIWPCCC ASAP.

Heather asked about showing high throughput figures on SIR listings, which currently only show median throughput. No one objected to showing high throughput on the listings, so Heather agreed to modify the listings.

Tim asked about including the file naming convention in Policy Memo #3. This was agreed at the last meeting.

Dave worked on a test page on the website demonstrated what has been done and we discussed moving forward.

There were some concerns expressed about using MS Front Page to update our web pages.

Curt mentioned that Laura Fisher had located Scott Bacon's files which were believed lost and she would be providing them to us.

### **Remanufactured Equipment**

Laura Fisher sent a letter stating that CA will not accept remanufactured equipment because CA does not believe that it has been shown to meet performance standards via a third party evaluation. It was said that PMP has a third party evaluation on remanufactured sensors and may submit to the WG. Tim believes that he will be receiving something from a remanufacturer on a court decision and agreed to ask Kathy Nam to look at this and provide some guidance to the WG. Mike said we don't need to take any action at this time, since we do not have an evaluation in hand to review. Greg said we should only list Original Equipment Manufacturers equipment. Don Taylor said the use of remanufactured equipment is common practice among service providers.

Heather said we should reexamine our threshold for large diameter piping due to EPA's definition in their rules. Tim and Heather will look at the listings in light of EPA's descriptions and bring back recommendations at the next meeting.

### **PAP Manual**

Lamar will send Probe Comparison Guidelines to Tim for inclusion in the Policy and Procedures (PAP) Manual.

Curt has written duties of the WG Chair position and will send to Tim.

Tim will send out the latest revised PAP manual and will set some dates to have stuff written with the goal being to have this completed two weeks before the next meeting.

### **VTTT Low Level Testing**

Lamar handed out June 2015 draft guidance and explained the background and the WG voted to approve the final on TN letterhead. The final will be posted on the website. Chris Ramshaw had commented that other VTTT had been listed for low levels and asked if they had undergone the same testing as Alert. We asked him to let us know who they were and we would follow up.

### **Protocols**

Tim hopes to have a contract in place for Battelle to finish up the protocols and they hope to have them wrapped up in a March-June 2016 time frame. Tim will send latest protocols to WG one last time before sending to stakeholder group. Protocols have gone through EPA editors. Anne Gregg will provide red line version for Tim and he will send us the documents he wants the WG to review. The final suitability study is on the ORD website. The WG will not use a protocol code on the listing summaries.

### **LUSTLINE Articles**

The following possibilities for future LUSTLINE articles were suggested:

How the new EPA rules affect the NWGLDE

Bulk pipelines and leak detection sizes (thresholds for bulk and large diameter tanks)

Sump Testing methods

The end of qualitative SIR

Aboveground Storage tank leak detection methods

Leak detection equipment testing

Articles could mention that we have a link to PEI RP-1200 and we have manufacturer links on our website.

Heather had an idea for a 6 part series and who is going to contribute to them; Tim will start with summary and others will contribute.

Curt has written a response to a question concerning the definitions of leak rates and thresholds which was suggested could be turned into a LUSTLINE article.

Other possibilities are a discussion of surface area calculations for field constructed tanks.

Lamar and Curt discussed retirement plans for 2016, and the spring meeting will be the last meeting for both. Heather suggested that we begin recruiting one member after the ASTSWMO annual meeting with the plan to add a member before the spring meeting. (Heather will see if NEIWPC will agree to fund 12 members for this one meeting). The WG will recruit the second member after Lamar and Curt retire and the number will be back to 11 members for the fall 2016 meeting.

It had been discussed in San Antonio that the WG would meet in Kansas City in the spring of 2016 and visit Ken Wilcox' testing facility. Tim and Heather will coordinate transportation to the lab. The preferred date to meet is April 18-21 with an alternate date of April 4-7. Curt will chair the spring meeting and Heather will take meeting notes. Helen will operate the computer. San Diego was suggested as the location for the fall 2016 meeting.

ATTENDANCE LIST  
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 Phoenix, AZ  
 September 16, 17, and 18, 2015

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