

NWGLDE Meeting – March 30, 2016 Minutes

Team Leader Updates

1. ATG and VTTT Methods- Lamar Bradley

ATG Completed Reviews:

- None at this time

ATG Under Review:

- 12-3-2016 documents received for OMNTEC Proteus Series B, K, and X ATG with MTG probes.
3-4-2016 draft listings developed. Team discussion on how best to list this model.
3-29-2016-two Draft listings sent to OMNTEC; they prefer combined listing- proceeding with Team review.

VTTT Completed Review:

- Purpora Engineering, Inc- Alert 8200 Series Underfill Method listed October 5, 2015

VTTT Under Review:

- None at this time

Other Activity

- ATG Team (and WG) should consider developing policy for listings when new equipment is evaluated vs. comparisons. Can be a topic for full group discussion at this meeting if desired. Has been discussed at past meetings and some members have concerns.

ATG 0.1 gph listing issues

Low priority item. Will be left for successor.

- USTest 2001 and 2001 Quick Test –nothing done on this.
- Veeder Root Prolink System, RJE Probes #RE-400-094 thru 112-5 should contact VR.

2. CITLDS Methods- Continuous ATG- OMNTEC MFG to update some information related to the console. The listing is ready, but is waiting pending workgroup discussion and ATG discussion. Draft is prepared.

Franklin Fueling listed T5 series, TS 550evo, and TS550 with SCALD.

CITLDS- Simmons corporation for Clearview submitted third party evaluation, except listed the ATG's used for the system. The decision was made to make the listings consistent- to list what was evaluated and open to use any NWGLDE listed ATG.

3. NVTTC Methods- Triangle wants to increase the volume in their listing. They have not re-submitted any additional evaluation.

4. Line Leak Detection Method- Franklin Fueling added their own UPP semi-rigid piping, using bulk modulus calculations, to their listing for electronic line leak detectors.

5. SIR Method-Lamar and Dr. Mitchell (SIR International) have drafted a protocol, formed a peer review group, will submit comments back, and review.

6. Interstitial Monitoring and Out of Tank Detector Methods-

Interstitial Monitoring Completed Review

- Morrison Bros. Co. Morrison Bros. Co.
924LS, 924 and 925 Sensor for use with the 918AC, 918S, 918D and 918Q Alarm Console
Interstitial Detector (Liquid-Phase).
- Pneumercator Company, Inc.
NWGLDE listed or revised:
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.
Revised company contact information for all listings.
- Sensorcomm, Inc.
Models LPS-5036 and TLD-3050 Sensors with Sensorcomm Relay Unit Type-C Alarm Console and
TLD-3050X Sensor with Sensorcomm FLASHER-BE Alarm Console.

Added to Out-Of-Tank Product Detector (Liquid-Phase) Method.

These are noted as applicable in interstitial areas. Company wanted listed as out-of-tank.

- TRM Sensors LLC
Models TRM-CC, TRM-CB AND TRM-CBX sensors for use with the TRM Relay Unit Type-C and
TRM-FLASHER-BE alarm consoles.

Added to Out-Of-Tank Product Detector (Liquid-Phase) Method.

These are noted as applicable in interstitial areas. Company wanted listed as out-of-tank.

- Veeder-Root

Added a statement to VR's current listing that contains test results for the 794390-409 sensor. The statement identifies the redesigned sensor's length remaining the same length of 284 inches. The new design, unlike the old, does not have a mesh netting around the sensor.

Listed results pertaining to the newly designed 794390-409 sensor for the 8601 Series/TLS Series; 8600 Series/TLS-450 Series; and TLS 350 Series Consoles. Indicated more clearly what sensors comprise each Series.

Interstitial Monitoring Under Review

- Omntec Mfg., Inc. OEL 8000 III Series Consoles (Proteus B, K, and X Consoles) with BX Series Sensors (BX-PDS, BX-PDWF, BX-PDWS, BX-LV, BX-LS, BX-LWF, and BX-RES Sensors), Tim Smith, 2/09/2016
 - Received clarification from Omntec that the consoles that comprise the OEL 8000 III Series are the: Proteus B, K, and X Consoles.
 - Draft listing to send for concurrence.
- OPW, iSite, iTouch, and EECO Series Fuel Management Systems with various sensors evaluated early 2012.
 - Completed partial listing posted on April 9, 2012 for the iSite, iTouch, and EECO Series Fuel Management Systems with various sensors - mainly float switches.
 - Reached out to OPW through KWA. Offered to do same as for FFS that tested other non-float type sensors with E85, and the following water/ethanol mixtures: 20%/80%; 30%/70%; and 70%/30%.
 - Testing with pure product and various representative water/product mixtures is designed to determine what, if any, effects water interferences might have on sensor performance.
 - Current test procedure is inadequate with evaluation in a pure ethanol blend such as E85.
- SGB (Sicherungsgeratebau GmbH) Vacuum Leak Detection System Model VLR CONTINUOUS INTERSTITIAL TANK SYSTEM MONITORING METHOD (PRESSURE/VACUUM)
 - NWGLDE posted SGB listing for Models VLX 30, VLX 350, VLX 400 in 2003.
 - NWGLDE posted listing for Models VL30P, VL 350P, and VL 400p in 2004.
 - Apparently the original submittal for the VL Models included information on the VLR Models. Company omitted request to include the VLR model on NWGLDE's listing(s).
 - Missing official request from SGB. Request made by Fuels Management Service – an end-user
- 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 2015, 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.

7. Aboveground and Bulk Storage Tank Methods- MLD Enhanced Leak Detection Method AST Method was listed.

8. Secondary and Spill Containment Test Methods- None at this time.

9. Admin- Fees collected. Helen has started renaming the archive files.

Update on SIR reliability comparison protocol- Peer reviewed. Received comments back. Those comments are being reviewed by Lamar and Dr. Mitchell. The plan is to send the revised draft SIR protocol to the SIR team for final review.

Update on “Under Review”, “Not Listed”, “Review Completed” Lists- Lamar developed a form to fill out to send to the person tracking this information. Helen volunteered to take this duty. Send updates to Lamar until June 30. After that, send the changes to Lamar.

Old Business-

1. Remanufactured Equipment Court Decision and Guidance. One of two companies that approached NWGLDE asking about potential listing of remanufactured equipment was supposed to provide court decision information relevant to leak detection equipment. Nothing has been provided. These companies have decided not to press forward with their third party listing and have rescinded their request for consideration of a listing. NWGLDE is taking no further action at this time.

2. ATG/ Inventory Control Regulation Issue - Veeder Root asked EPA back in the 1990's if the ATG needed to do another form of inventory control. EPA had stated no. It does the “testing.” As long as the ATG meets the ATG requirements within the accuracy requirements, the EPA policy was that it met the requirement for the inventory control “reconciliation.” The rest of the inventory control requirement that must be met is the water monitoring in the tank. This has been covered in the original EPA test protocol. EPA discusses this issue in the preamble to the 2015 federal UST regulation. EPA clarify that the reference to 280.43(a) should be narrow for accuracy to reference 280.43(a)(6) - the water monitoring requirement.

New Business-

1. Leak Detector Calibration - Field testing procedure says to test at 3.5 gph instead of 3.0 gph to “calibrate” the line leak detector. Part of the vendor discussion.

2. DPLLD Recall - This is not a "recall". Field recovery of sensors associated with TLS 450. These were sent out calibrated wrong. They will be recovered as soon as possible.

Open Meeting

Tim provided a status update of the EPA protocols, development, process and Stakeholder review. He briefly discussed the relevance of the new regulations as well.

Tim indicated that the QAPP was complete as it was associated with the testing. The Suitability Assessment is considered complete, but pending current Stakeholder Group review, it might be modified to include minor revisions. He did mention that, at the time the QAPP was prepared, EPA proposed in the 2011 proposed federal UST regulation to eliminate groundwater and vapor monitoring methods. As such, these methods were not comprehensively included in the suitability assessment. As such, one likely amendment to the Suitability Assessment is an address of the ability of these methods to detect the product stored, specifically the miscibility of the product stored with regard to groundwater monitoring methods.

Kevin Keegan, Tanknology- UST Piping release detection and periodic inspections. Kevin presented some thoughts on implementation of the new regulations. EPA has clarifications (Q&A) on the rules. Need to consider whether the state has State Program Approval (SPA) or not. He said he sees little impact to TANK leak detection. This prompted some discussion of interstitial requirements, state specific requirements, groundwater, vapor and SIR monitoring methods. NWGLDE discussed piping release detection- scenarios, sump testing requirements, applicability to older sumps, alarm responses during walk-through inspections, overfill device inspections, and testing overfill devices.

Recognition of the retirement of Curt and Lamar. Curt was the founder and Chair of the workgroup since its inception. Lamar has been a long-time member of the group as well as the most recent Vice Chair. While the contributions of both of these gentlemen to this workgroup could never be fully articulated, could never be adequately honored, and our gratitude could never be sufficiently expressed, they were recognized during the meeting and thanked by the workgroup and the attendees at the end of the open meeting.

Closed Meeting

1. Team Review- Shaheer will be lead for SIR. Helen will be on the SIR team as well.

ATG team leader will be Mike. Don will be on the ATG team.

CITLDS remove Heather.

NVTTT- no change.

LLD- Greg leader. Remove Heather. Add Don.

IM- Remove Lamar add Don

AST- no change

Secondary- Marcia team lead. Remove Shaheer.

List Admin- Heather lead. David only.

Discuss vendor presentation. Kevin Keegan's presentation was a regulatory discussion, not a discussion of an evaluation of a method.

New Business (Continued)

4. Sump Tightness test- discussion of methods. More relevant to state regulation implementation but tied to current listing(s) of secondary and spill containment test methods.

5. Reviewed the Links webpage.

- Ask Sam Gordjii and then add his name, company, number, and other relevant information.
- Delete State UST/AST Program Engineering and Equipment Approval Contacts
- Fix EPA OUST State and Territorial UST program directory
- Delete general EPA webpage link
- Delete EPA's evaluation protocol page
- Delete the Steel Tank Institute link
- Fix EPA Publications link
- Remove the words updated from the Flex piping Id guide

6. Delete the Canada reference on the front page. Change the "signature" on the front page to Heather. Curt and Lamar will be removed from the group members. Heather and Pete will be put in as the chair and vice-chair. Don will need to be added (alphabetically). Members will update Dave and Heather with their contact information. – Dave

Old Business Continued

3. Listing issues from ATG console, probe and sensor listings- Tim will bring a more detailed question back to the next meeting.

4. The Software package will be listed in the comment section but the consoles will be listed in parenthesis (in the title). Shaheer and Heather will follow up on the current inconsistent CSLD and ELLD Veeder Root listings to try to obtain the correct information for the updates.

5. SIR- Heather will start adding highest testing throughput on SIR listings, not just median throughput of the data from the evaluations.

6. Recommendation for threshold for large diameter piping. As EPA has defined Bulk/Large Diameter Piping. Do all of the listings in the bulk diameter method meet the minimum threshold of the federal requirements? Mark which ones should be listed in standard in LTT and which should remain in this listing? Mark the ones to be moved and share with the workgroup.
 7. PAP Manual- Tim discussed the status of the updates. He will send it to Dave and Heather.
 8. File Retention Committee, Status of Scanning and Access to Files. Helen has been updating the files. She is following the naming protocol agreed upon by the workgroup.
 9. Tim's sensor team-related files have not yet been processed. Files anticipated from California have not yet been received. Heather will send Dave Laura' Chaddock's email address.
 10. No updates on trying to create an annual electronic report. It's still a hard copy list.
 11. Dave is removing the fuel disclaimers from listings. He is proceeding alphabetically and is in the "T" section.
 12. LUST Line article- Curt and the rest of the group will be getting back to Tim on his draft article. Members are requested to get edits back to Tim back by COB, Wednesday 13th. The workgroup will be writing a series of articles related to the revised federal UST regulatory requirements.
 13. One action NWGLDE will take related to the revised federal UST regulation is adding a statement to "Qualitative SIR" methods listed on NWGLDE's Website. Under the header, we will state something to the effect: As of October 13, 2015, these methods will no longer be acceptable for use as a release detection method in States without State Program Approval (SPA). If the state has SPA, please check with the implementing for the state-specific deadline.
 14. Confidential information being submitted to the Work Group. Draft policy memo on confidentiality was reviewed and will be issued as policy #5. Lamar will send it electronically.
 15. File naming policy. The file naming policy needs to be included in Policy Memo #3.
 16. Recruiting to replace soon to be vacant position. Shoot for message out in June. Close at the end of June/first of July. Make a decision in July. Get new member in place before Fall meeting.
 17. Location and potential dates of the Fall meeting.
 - 1st choice is San Diego, CA
 - 2nd choice is Salt Lake City, Utah
 - 3rd choice is Portland, Oregon
- 1st choice the week of September 26th and 2nd choice- the week of the October 3rd.
September 5th and 12th will not work. Push later if needed.

Don volunteered to take minutes at the next meeting.

ATTENDANCE LIST
 National Work Group on Leak Detection Evaluations
 Kansas City, MO
 April 5, 6, and 7, 2016

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Kansas City, MO
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