

FAQs from the NWGLDE

... All you ever wanted to know about leak detection, but were afraid to ask.

Here's How to Determine if an NWGLDE Listing Is Applicable for Use with Biodiesel Blends

In this LUSTLine FAQs from the National Work Group on Leak Detection Evaluations (NWGLDE), we discuss a change of policy that was implemented after the addition of biodiesel blends to NWGLDE listings, which was discussed in LUSTLine Bulletin 67.

Note: The views expressed in this column represent those of the work group and not necessarily those of any implementing agency.

Q. I submitted a request to add biodiesel blends to my ATG listings on the NWGLDE List. Why do I not see them listed under "Applicability" in any of my listings?

A. The following NWGLDE policy for listing biodiesel blends appeared in the NWGLDE FAQ in the March 2011 issue of *LUSTLine*, Bulletin #67:

"Manufacturers of leak detection equipment are encouraged to contact the appropriate members of the NWGLDE to request the addition of ASTM standard biodiesel blends to their current listings."

The NWGLDE realized shortly after this was published that some leak detection equipment is still in use where a manufacturer of the equipment is no longer in business. Without a change in NWGLDE policy, this equipment could not be used with any biodiesel blends, even though it is likely capable of being used with certain biodiesel blends. As a result, we added a new definition and a disclaimer to our website at www.NWGLDE.org that supersedes the above policy. Bold statements were added to the top of our home page with active links to the following definition and disclaimer in an effort to ensure the new policy would be noticed by everyone visiting the site.

Definition

Diesel or Diesel Fuel:

Middle petroleum distillate fuel that may contain up to 5% biodiesel in accordance with ASTM standard D975.

Disclaimer

*Unless specifically indicated on the individual data sheets, equipment listed by the NWGLDE has not been determined to be acceptable for use with alternative fuels **with the following exception:***

Biodiesel B6 through B20 meeting ASTM D7647 and biodiesel B100 meeting ASTM D6751 may be used with all equipment listed for diesel in the NWGLDE list whether or not these alternative fuels are included on individual data sheets. This exception DOES NOT APPLY to leak detection test methods using Out-of-Tank Product Detection (Vapor Phase) for B6-B20, and Out-of-Tank Product Detection (Liquid and Vapor Phase) and any tracer-based test methods for B100. For these methods, individual data sheets will have to be referenced for applicability.

Since the definition and disclaimer may be somewhat difficult to follow, we have broken them down to clarify what they are saying as follows:

- Biodiesel B5 will not be shown on any NWGLDE leak detection equipment listings. Instead, all NWGLDE listings that are applicable for diesel are by definition also acceptable for use with biodiesel B5.
- Biodiesel B6 through B20 will also not be shown on any NWGLDE leak detection equipment listings. Instead, all NWGLDE listings that are applicable for diesel are now considered acceptable for use with biodiesel B6 through B20.
- Because diesel and biodiesel blends do not produce vapors, Out-of-Tank Product Detection (Vapor Phase) leak detector listings do not include diesel, and therefore will not be acceptable for use with any biodiesel blends.
- Biodiesel B100 will not be shown on NWGLDE leak detection equipment listings with the exception of Out-of-Tank Product Detection (Liquid and Vapor Phase) and any tracer-based test methods. Instead, all NWGLDE listings other than Out-of-Tank Product Detection (Liquid and Vapor Phase) and any tracer-based test methods that are applicable for diesel are also acceptable for use with Biodiesel B100.
- Manufacturers of Out-of-Tank Product Detection (Liquid Phase) and any tracer-based test methods must perform an evaluation using Biodiesel B100, and must submit the evaluation to the NWGLDE before any of the Biodiesel blends may be added to a NWGLDE leak detection equipment listing.
- Because biodiesel B21 through B99 blends are not included in an ASTM standard (see *LUSTLine* 67), leak detection equipment manufacturers must perform a third-party evaluation using these biodiesel blends. The evaluation must be submitted to the NWGLDE before the NWGLDE will consider adding any of these biodiesel blends to any NWGLDE leak detection equipment listing.

The NWGLDE needs to clarify that the above discussion concerning applicability of the diesel and biodiesel is based on *functionality* and not compatibility. The following NWGLDE disclaimer, which can also be found on our website, was written to clarify the reason for this:

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Since long-term material compatibility with the product stored is not addressed in test procedures and evaluations, the NWGLDE makes no representations as to the compatibility of leak detection equipment with the product stored. ■

■ About the NWGLDE

The NWGLDE is an independent work group comprising ten members, including nine state and one USEPA member. This column provides answers to frequently asked questions (FAQs) the NWGLDE receives from regulators and people in the industry on leak detection. If you have questions for the group, contact them at questions@nwglde.org.

NWGLDE's Mission

- Review leak detection system evaluations to determine if each evaluation was performed in accordance with an acceptable leak detection test method protocol and ensure that the leak detection system meets USEPA and/or other applicable regulatory performance standards.
- Review only draft and final leak detection test method protocols submitted to the work group by a peer review committee to ensure they meet equivalency standards stated in the USEPA standard test procedures.
- Make the results of such reviews available to interested parties.

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Discovering the Success Stories

Another way to strike data-mining gold is to research program success stories. Petroleum cleanup programs tend to function mostly in an “aw shucks, just doing my job” mode. Unfortunately, legislatures and politicians of all stripes are making tough budgeting decisions and are asking fundamental questions about continuing well-established programs. It is now essential to be able to articulate and promote the value of governmental programs.

Aggregate statistics touting tanks removed, sites closed, and tons of soil treated are valuable, but probably just as important is the development of success stories. These summaries can use a specific site to explain in a concrete fashion how our programs can assist with solving difficult problems. The internet is a wonderful way to find information on redevelopment success stories. We have been able to find data on economic impacts of sites that our programs helped to clean up and even awards won by those projects. I used this information to craft a series of well received success stories on the positive environmental and economic impacts of New Hampshire petroleum reimbursement funds.

Take Charge of Your Data

Data management and mining should play an essential role in developing good tank programs and sound state fund management. We have found it useful when research-

ing sites that are out of compliance to make the effort to better understand and address underlying issues. It is useful, for example, to determine current site ownership (e.g., foreclosure, tax deeding, property sale, property owner death) when attempting to obtain compliance. There are excellent online registry-of-deeds websites in New Hampshire that can be searched for tax, deed, and recent sale information. Simple queries can now identify all sites with overdue cleanup, UST compliance, or even cross-program compliance issues.

I particularly like the ability to find information on tank system hardware. This has provided very useful cross-program data that our remediation section has used to troubleshoot new releases or emerging threats (e.g., vapor recovery system hardware information was correlated with groundwater data to discover a link between groundwater contamination and vapor releases).

Finally, a variety of tools are now available to verify the accuracy of consultant contaminant-receptor surveys. Online access to recent aerial photograph data can confirm whether an undeveloped lot has been redeveloped into a lot with a brand new, vulnerable water supply well. Also, New Hampshire’s geographic information system (GIS) makes it very easy to identify public water supply wellhead protection areas or private wells using our online water-well inventory GIS layer.

This is just a quick summary of the possibilities lurking in many rich veins of data that can be sifted and sorted to meet your program needs. My advice? **Take charge of your data and make it work for you.** ■



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