

FAQs from the NWGLDE

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

Do All Implementing Agencies Recognize NWGLDE Listings as Acceptable?

In this LUSTLine FAQs from the National Work Group on Leak Detection Evaluations (NWGLDE), The NWGLDE discusses how acceptance of leak detection equipment may vary in different implementing agency jurisdictions. Note: The views expressed in this column represent those of the work group and not necessarily those of any implementing agency.

Q. When a leak detection method is listed on the NWGLDE List, does that mean it can be used in every state?

A. Once a leak detection method or piece of equipment is listed on the NWGLDE List, the decision as to whether it can be used in any state is solely up to each implementing agency. Many states recognize an NWGLDE listing as fundamental to acceptance in that state, but just because a method or piece of equipment is listed does not automatically mean that an implementing agency will or must accept its use. The decision to accept any method or piece of equipment is a policy decision and the NWGLDE does not make policy decisions for any implementing agency. The List maintained on the NWGLDE website (www.nwglde.org) was created by the NWGLDE to fulfill our mission. Our **Mission Statement** summarizes the role of the Work Group as follows:

- Review leak detection system evaluations to determine if each evaluation was performed in accordance with an acceptable leak detection test method protocol;
- Ensure that the leak detection systems under review meet EPA and/or other regulatory performance standards, if applicable;
- 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 EPA standard test procedures;
- Make the results of such reviews available to interested parties.

Implementing agencies are free to use the **List of Leak Detection Evaluations** (or not use it) as they

see fit. Indeed, some implementing agencies maintain their own lists and establish their own restrictions or conditions that govern leak detection approval and/or operation in those jurisdictions. Acceptance of, and any conditions established to meet leak detection requirements in any jurisdiction state, tribal or local, is at the sole discretion of that implementing agency. The NWGLDE List does not replace, substitute for, or supersede any regulatory authority, because the Work Group is not a regulatory body and the List is not a regulatory document. Information contained on the List may be used by the implementing agency, but ultimately tank owners are held accountable to the rules and enforcement authority of the implementing agency and not to the Work Group or the List.

If you wish to know if a certain leak detection system or test method protocol is acceptable within your jurisdiction, you will need to contact your local implementing agency to determine if they recognize the leak detection equipment and protocols included in the NWGLDE list. ■

About the NWGLDE

The NWGLDE is an independent work group comprising eleven members, including ten 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.



L.U.S.T.LINE Subscription Form

Name _____ Company/Agency _____

Mailing Address _____

Email Address _____

One-year subscription: \$18.00

Federal, state, or local government: Exempt from fee. (For home delivery, include request on agency letterhead.)

Please enclose a check or money order (drawn on a U.S. bank) made payable to NEIWPCC.

Send to: **New England Interstate Water Pollution Control Commission** Wannalancit Mills, 650 Suffolk Street, Suite 410, Lowell, MA 01854
 Phone: (978) 323-7929 ■ Fax: (978) 323-7919 ■ lustline@neiwpc.org ■ www.neiwpc.org