

# FAQs from the NWGLDE

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

## How to Get a New Leak Detection Device Listed on the NWGLDE Website

In this issue's FAQs from the National Work Group on Leak Detection Evaluations (NWGLDE) we discuss the procedure that must be followed before a leak detection device may be listed by the NWGLDE. Please note: the views expressed in this column represent those of the work group and not necessarily those of any implementing agency.

**Q.** I have a new leak detection device, and I want to get it listed on the NWGLDE website. How do I do that?

**A.** This is a very basic question, but a detailed answer could take several pages, so we will provide the following *Reader's Digest* version. The NWGLDE website contains more details in Listing Procedures and Requirements at [www.nwglde.org/downloads/listing\\_requirements\\_pdf.pdf](http://www.nwglde.org/downloads/listing_requirements_pdf.pdf) and in the NWGLDE Policy Memo #3 at [www.nwglde.org/Policy3\\_PDF.pdf](http://www.nwglde.org/Policy3_PDF.pdf).

- **Contact an independent, or "third-party," evaluator to discuss having an evaluation of your leak detection method.**

"Third-party evaluators" include consulting firms, test laboratories, not-for-profit research organizations, and educational institutions that have no conflict of interest with you or your company. The evaluator can tell you about specific evaluation requirements for your method, whether special testing equipment or facilities will be needed, how long the evaluation process may take, and of course, how they price their services. Evaluators that have performed UST leak detection evaluations can be found in the lower right corner of all NWGLDE leak detection equipment listings at [www.nwglde.org](http://www.nwglde.org). After you have engaged an evaluator, you will receive a report summarizing results of the testing process according to specific report guidelines. Additional supporting documentation may be submitted with the evaluation.

- **Perform the evaluation according to an approved protocol.**

The NWGLDE has reviewed and approved numerous protocols for testing various leak detection methods and equipment. NWGLDE-approved protocols are located at [www.nwglde.org/protocols.html](http://www.nwglde.org/protocols.html) on our website. One of them should be applicable to your method; however, in years past it was not uncommon for a new technology to appear before there was an approved protocol for evaluating it. This produced a "cart before the horse" situation for the NWGLDE whose mission is to review third-party evaluations according to an approved protocol. In those cases, the evaluator would need to draft an applicable evaluation protocol that was

reviewed and approved by the NWGLDE before a review of the equipment evaluation could be undertaken.

For some equipment, it might be necessary to modify or amend an existing protocol to make it applicable to the method or equipment being tested. If that is the case, then the evaluator must make sure the NWGLDE is aware of those protocol modifications and in agreement with them *before* the evaluation is done. It would be counterproductive to have to redo an evaluation simply because protocol amendments were not acceptable to the NWGLDE, or never shared with us in advance of the evaluation.

- **Once the evaluation is completed, submit it to the NWGLDE for review.**

Submittal of a final evaluation is the last step in the NWGLDE listing process and it can be complicated. It is very important for vendors to understand that serving on the NWGLDE is not a full-time job for any member. Members work for individual states, counties, or USEPA, and their first work obligation is to their employer. Their NWGLDE responsibilities normally take a back seat to the demands of their employer. All members have agreed to make time available to accomplish NWGLDE activities, but there are times when member work demands may cause a review to take longer than usual.

Work Group Policy Memo #3, which is referenced above, states: *For planning purposes, anticipate at least a six-month review process for a complete evaluation package.* If the evaluation submittal package is complete, it would rarely require six months for a review. However, if there are unanswered questions, additional documentation to be provided, or additional testing needed, the review process could take six months or longer. In order to ensure that the process will be able to move forward, it is very important to communicate with the NWGLDE throughout the review process.

That being said, the review process itself is as follows:

1. The evaluation package is distributed to members of a specific review team according to leak detection technology. The teams typically consist of two to four persons and are subcommittees of the

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entire group. A list of teams and team members is posted on the NWGLDE website.

2. Although all team members receive the package, a lead reviewer often does the initial review.
3. Any concerns or problems identified are discussed with the rest of the team and then with the vendor.
4. If the vendor resolves the concerns, then the review proceeds.
5. If the vendor is nonresponsive, the team may suspend the review process.
6. If the vendor disputes any concern(s) of the team, there is an opportunity to bring the concern(s) before the entire NWGLDE for further discussion and resolution.
7. Once the team has finished its review and all concerns are satisfied, a draft leak detection method listing is developed. The team then sends the vendor a proposal of how the listing will appear on the NWGLDE List.
8. If the vendor has concerns, the team will work with the vendor to resolve them.
9. If the vendor is satisfied with the listing, the team leader sends it to the NWGLDE chair, who circulates it to the entire NWGLDE with a set

period to concur or express any concerns with the draft.

10. After the members are satisfied with the draft listing, the chair sends it to the NWGLDE webmaster who updates the website listing.

More specific details of the review procedure can be found in Work Group Policy Memo #3, available on the NWGLDE website. ■

**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](mailto: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 EPA 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 U.S. EPA standard test procedures.
- Make the results of such reviews available to interested parties.

**New from ASTSWMO****Compilation of State UST Fund Fraud & Abuse Cases**

The Association of State and Territorial Solid Waste Management Officials' ASTSWMO Tanks Subcommittee's State Fund-Financial Responsibility Task Force has developed a new *Compilation of State UST Fund Fraud & Abuse Cases*. The document chronicles instances of state underground storage tank (UST) fund fraud and abuse nationwide. The Task Force, through its regional members, contacted every state to solicit entries for the document spreadsheet. States were asked to be as specific as possible, but were cautioned not to divulge anything that was confidential or they did not want to be made public.

The spreadsheet provides summaries of cases that have been submitted to ASTSWMO by state UST managers, including a description of the fraud cases, how they were detected, and case outcomes. The intent of the spreadsheet is to assist states in detecting any similar cases in their own state. The Task Force will update the spreadsheet on a regular basis. If you have examples you would like to add to the next version you may send them to Charles Reyes at [charlesr@astswmo.org](mailto:charlesr@astswmo.org). The document is available on the ASTSWMO website: [www.astswmo.org](http://www.astswmo.org). ■

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