

FAQs from the NWGLDE

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

Secondary- and Spill-Containment Test Methods

In this LUSTLine FAQs from the National Work Group on Leak Detection Evaluations (NWGLDE), we will discuss the reasons why there is an absence of secondary- and spill-containment test-method equipment listings. Note: The views expressed in this column represent those of the work group and not necessarily those of any implementing agency.

Q. Why are there no secondary- and spill-containment test methods on the NWGLDE list when the NWGLDE has a Secondary- and Spill-Containment Test Methods Team?

A. Before we answer the question, we want to make sure everyone understands what kinds of test methods fall under these categories. Secondary-containment test methods are used to test the integrity of tank-top and piping transition containment sumps, and under-dispenser containment sumps, while spill-containment test methods test the integrity of spill catchment basins (spill buckets).

If you look at our mission statement at www.nwglde.org, you will find that the appearance of a method on the NWGLDE list is dependent on a third-party evaluation being performed on that method in accordance with a protocol found to be acceptable by the work group. Since there are currently no protocols for evaluating secondary- and spill-containment test methods that have been found to be acceptable by the NWGLDE, there can be no third-party evaluations and thus no equipment listings for these test methods

Q. Why are there no acceptable protocols for evaluating Secondary- and spill-containment test methods

A. Most state, territorial, and local regulatory agencies do not have regulations that require secondary- and spill-containment testing. Those that do require the testing are currently approving or simply allowing the use of secondary- and spill-containment test equipment based either on the manufacturer's performance claims or without consideration of performance, rather than waiting for the equipment to appear on the NWGLDE list. As long as the equipment is allowed to be used without a third-party evaluation, there would seem to be no incentive to invest in writing a protocol and performing a third-party evaluation.

However, for underground storage tank and piping leak detection equipment there is an advantage to being listed by the NWGLDE. These manufacturers do not have to pursue approval from each and every state, territorial, and local regulatory agency, because most regulatory agencies' underground storage tank and piping leak detection equipment approvals are based on whether or not the equipment is listed by the NWGLDE. Since only a few

agencies regulate secondary- and spill-containment test methods, there is currently no regulatory agency approval advantage to being on the NWGLDE list.

One other thing that could also be discouraging protocol development is the lack of either national consensus or regulatory performance standards for secondary- and spill-containment test methods. Since there is currently a variety of these test methods on the market that vary significantly in performance, manufacturers may be putting off investing in a protocol and third-party evaluations now in order to try to avoid having to repeat the evaluations if a nationally recognized performance standard is established that is more stringent than their performance claims.

Q. What will it take to encourage secondary- and spill-containment test method protocols to be written?

A. Protocols will most likely be written and third-party evaluations performed when most states require secondary- and spill-containment testing in accordance with a nationally recognized performance standard. The best way this can be accomplished is for USEPA to write regulations requiring this testing and encourage regulatory agencies to adopt them.

The good news is that USEPA is currently looking at their first major revision to the federal underground storage tank rules since the rules came out in 1988, and the agency has proposed operation and maintenance requirements for UST system components, including requirements to perform secondary- and spill-containment testing.

USEPA is proposing to require UST-system owners and operators to test tank and piping interstitial areas used for release detection (and not continuously monitored) at least once every three years using vacuum, pressure, or liquid testing. Sumps used as secondary containment must also be tested under the proposed rule change, unless the sump is double-walled and the space between the walls is monitored continuously. Additionally, USEPA proposes to require spill-containment testing at installation and at least every 12 months thereafter, unless the spill containment is double-walled and the space between the walls is monitored continuously.

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Testing of these areas would need to be in accordance with express requirements developed by the manufacturer, a performance standard developed by a nationally recognized association or independent testing laboratory, or requirements established by the implementing agency. The proposed rule can be viewed at www.epa.gov/OUST/fedlaws/proposedregs.html and includes details about the continuous monitoring exception.

In the meantime, if a manufacturer wants to try to get a jump on the evaluation process, the NWGLDE is willing to review new secondary- and spill-containment test protocols and third-party evaluations. Once a third-party evaluation is performed and submitted to the NWGLDE, if found acceptable, the equipment could be listed with each test method's limitations, precision, and accuracy. When nationally recognized performance standards are finally in place, if the listed equipment is within those standards, the equipment would be able to remain on the NWGLDE list. ■

■ 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@nwgldc.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.