Field Notes... continued from page 22

- Plumbing from the top of the shear valve
- Suction-pumping systems
- Warning users that the country's move to higher ethanol blends and lower amounts of sulfur in diesel may result in leaks or unusual operating conditions that may necessitate more frequent inspections than outlined in the document
- Determining that DEF is outside the scope of the recommended practice.

Recommended Practices for Inspection and Maintenance of Motor Fuel Dispensing Equipment (PEI/RP500) can be purchased at *www.pei.org/rp500*. Price is $40 for members; $95 for nonmembers. ■

FAQs from the NWGLDE

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

Adding Biodiesel Blends to NWGLDE Leak-Detection Equipment Listings

In this LUSTLine FAQs from the National Work Group on Leak Detection Evaluations (NWGLDE), we discuss our policy for the addition of biodiesel blends to our leak-detection-equipment listings. Note: *The views expressed in this column represent those of the work group and not necessarily those of any implementing agency.*

Q. ***Is the NWGLDE going to allow the addition of biodiesel blends to listings in accordance with the Biodiesel Industrial Advisory Panel report?***

A. The Biodiesel Industrial Advisory Panel (BIAP) report *Effects of Biodiesel Blends on Leak Detection for Underground Storage Tanks and Lines* dated August 2010 (amended January 2001), prepared by Ken Wilcox Associates, Inc. states that the ASTM D975 standard allows diesel fuel to include up to 5 percent biodiesel. In response, the work group added the following definition to the NWGLDE website glossary:

- **Diesel or Diesel Fuel:** Middle petroleum distillate fuel that may contain up to 5 percent biodiesel in accordance with ASTM standard D975.

As a result, all work group listings that are applicable for use with diesel are also acceptable for use with B5 biodiesel.

Based on the BIAP report, the work group implemented a policy that allows a leak-detection-equipment vendor to request that certain biodiesel blends meeting ASTM standards be added to listings without additional third-party evaluation, as follows:

- *ASTM D7647 Biodiesel B6–B20:* Acceptable for all current methods of leak detection, except an out-of-tank product detector (vapor phase)
- *ASTM D975 Biodiesel B100:* Acceptable for all current methods of leak detection, except an out-of-tank product detector (vapor phase), liquid sensors (dry interstitial space and out-of-tank), and all tracer methods

The BIAP Report also made a recommendation that certain leak-detection equipment should not require third-party evaluation prior to listing the equipment for biodiesel B21–B99. The NWGLDE did not agree with this recommendation, since the production of B21–B99 is not in accordance with an ASTM standard. Instead, B21–B99 blends are currently produced by blending ASTM D975 diesel and ASTM D6751 B100. Since the report was written, the BIAP has indicated that they are working with ASTM to develop a standard for B21–B99. Until such a standard is developed and implemented, the NWGLDE will only add this range of biodiesel to a listing if the leak-detection equipment was third-party evaluated using biodiesel blends in the B21–B99 range. Once the ASTM standard is completed, the NWGLDE will review the standard and may revise its policy.

The BIAP report discussed only biodiesel fuels produced using ASTM standards. Leak-detection-equipment manufacturers who request listing of a biodiesel fuel not produced in accordance with ASTM standards must submit a third-party evaluation using this fuel to the Work Group before consideration will be given to add the fuel to the NWGLDE listing.

Another recommendation by the BIAP report is that compatible materials be used in the manufacture of leak-detection equipment for use with biodiesel blends. Since protocols used to evaluate leak-detection equipment do not include material compatibility testing, the NWGLDE previously developed the following disclaimer to address material compatibility:

- 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.

Therefore, since the NWGLDE does not take into account material compatibility when considering requests to list leak-detection equipment. No changes will be made to leak-detection equipment-listings based upon this aspect of the BIAP report.

FAQs... *continued from page 22*

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. Contact information can be found under *"Group Members"* and *"Team Members"* at *www.nwglde.org.*

A copy of the Biodiesel Industrial Advisory Panel (BIAP) report *Effects of Biodiesel Blends on Leak Detection for Underground Storage Tanks and Lines* can be found at *www.nwglde.org* under "Downloads." ■

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, please 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 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.

■ TQM and USTs *from page 10*

represent strictly pass/fail statistics. The data at this point do not indicate whether the leaks are liquid leaks at the tank bottom or vapor leaks from the tank top. Nor do the statistics indicate whether the failed tests for double-walled tanks merely resulted in a release to the interstitial space or to the environment. Ed tells me that many of these issues could be resolved by reviewing the tester's notes on the test, but that review would need to be done by a person familiar with the test protocols and the often-cryptic language that testers use to document their findings.

So What's the Point of this Soapbox?

Simple. a) We need some hard data on what is wrong with our UST systems today, if we're ever going to learn how to make them better (i.e., more leakproof) in the future. b) If we really want the data, we need to enlist the help of those out there doing the work—the installers, testers, and third-party monitors who are seeing the warts in our UST systems in real time on a daily basis. I believe that many of these people would be happy to help, especially if there were funds available to pay for the time it will take to pore through their data bases and get the information that we really need to move our UST system population to the next level of integrity.

P.S. I'm planning on spending some more time with Ed's data to see what's there and describing my findings in the next issue of *LUSTLine*. ■

■ Fuel and Tank Disconnect *from page 13*

system every quarter. Keeping tanks water free, incorporating a desiccant dryer on the vent alarm, and managing the water content by immediately removing it to avoid that "perfect storm" when water and temperature combine to manifest microbial contamination. This is in fact the one place where tank owners can lend a helping hand to their fuel supplier and make a big difference in both fuel performance and storage tank longevity.

What Next?

My goal in writing this article was to help the reader look beyond the tank system to the entire fuel-supply chain and understand that no matter what happens in that fuel tank, whether good or bad, it is still a direct result of its entire life cycle. A short summary would suggest that all parties involved in the fuel-distribution business work collegially to establish an easy-to-follow road map for quality fuel preservation from upstream to downstream. Open communication will be required if we are to minimize fuel-quality issues that have compromised performance both under the hood and inside the tank system. ■

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