

FAQs from the NWGLDE

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

Old and New CITLDS Protocols—What's That About?

This installment of the National Work Group on Leak Detection Evaluations' (NWGLDE's) FAQs focuses on the different protocols used to certify continuous in-tank leak detection systems (CITLDS) as well as which protocol the NWGLDE believes meets the federal requirements for manufacturer's certification of equipment performance. Please Note: the views expressed in this column represent those of the work group and not necessarily those of any implementing agency

Q. Has any CITLDS equipment that was evaluated and third-party certified using the old manufacturers' protocols been accepted by the NWGLDE?

A. We can get to the answer by first looking at the history of CITLDS protocols. CITLDS had not yet been invented when U.S. EPA published protocols in 1990 for testing leak-detection methods. When CITLDS equipment came along later and the manufacturers wanted to evaluate their equipment, they had to develop their own protocols. The manufacturers developed their own protocols and had their equipment tested using these protocols. None of these protocols were alike, and most did not require very stringent tests of the operation of the equipment. Since this was before the first NWGLDE list was issued, many states reviewed and accepted CITLDS evaluations that had been performed using the manufacturers' protocols.

When NWGLDE began to review available CITLDS evaluations, it determined that most of the protocols were not sufficient. As a result, NWGLDE only listed one manufacturer's CITLDS equipment in the 3rd Edition NWGLDE list on April 18, 1997. The California State Water Resources Control Board volunteered to take the lead to try to encourage CITLDS manufacturers to come together and write an improved protocol that all manufacturers could use.

Dr. Jairus D. Flora, Jr. wrote a new protocol, and the California State Water Resources Control Board and NWGLDE, both of which provided technical reviews of the protocol, accepted the new protocol on January 7, 2000. The new protocol covered three types of continuous systems: continuous automatic tank gauging systems (ATGS), continual reconciliation, and automatic monthly inventory control. It required more stringent testing of CITLDS equipment as well as testing at both laboratories and operating fueling facilities. It also addressed the operation of the equipment in manifolded tanks, limited the oper-

ation of the equipment based on throughput, and provided for the optional inclusion of dispenser-blending data.

Most CITLDS manufacturers reevaluated their equipment using this new protocol. The CITLDS leak-detection equipment on the NWGLDE website and list were evaluated using this protocol. However, a representative of a CITLDS vendor that had its equipment recertified under the new protocol has stated that his company believes that it is not subject to the throughput limitation requirements of the January 7, 2000, protocol in states where a regulatory agency previously accepted its evaluation under the old protocol.

NWGLDE believes that the January 7, 2000, protocol provides a more thorough evaluation of CITLDS equipment and levels the playing field for CITLDS manufacturers. NWGLDE also believes that restrictions and limitations in the new protocol should apply to all equipment certified using the new protocol. However, NWGLDE does not revoke or invalidate test protocols. Therefore, the final decision as to whether or not to accept a manufacturer's certification of leak-detection equipment performance lies with the local regulatory agency.

About NWGLDE

NWGLDE is an independent work group comprising ten members, including eight state and two U.S. EPA members. 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 U.S. 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 ■