

**Minutes of National Work Group Meeting  
Charlotte, N. Carolina  
March 13 & 14, 1997**

List of guest state members and vendors (present only during the open part of the meeting) attending the meeting is attached.

**Wednesday March 13, 1997**

I. Old business

1. Curt distributed copies of new draft list and the letter "Have you heard about our list.....". Comments requested before leaving the meeting if possible.  
**Absolute deadline for all the corrections and additions is March 28th.** All are due to Curt by this deadline.
2. The letter referred to in item 1 above, **comments to Dave Wiley**, is addressed to the states and trade publications.
3. **Cover letter for the list will include the Internet access information.**
4. Beth stated that **Curt's letter in Appendix B of the list needs to be updated.**
5. **List is planned to be finalized by April 11th.**
6. Discussions on the need for conversion of the list from Word to Word Perfect. Dave Wiley is working on this issue.
7. Within a few days of finalizing the list, it will be electronically available. But the printing will take about 4-7 weeks.
8. The sections listed as "Not Available" in the draft version will not be in the third edition. List of approved protocols and ATG maintenance checklist may be included. Shahla will help Curt so they can be included.

II. Multiple vendors

Discussion conducted on the issue of listing of vendors that have identical equipment with different names. Generally, either vendors buy the equipment from one source, or one vendor markets the equipment under their own name and also sells the technology to another vendor to customize it with their own name and market it. The item for work group discussion was whether multiple listing was needed and if so what documentation must be submitted by the

"copy vendors". Almost every one agreed that separate listing is beneficial to the users of the list. There was discussion on requesting a full third-party report (generally it is a reprint with a new name) and/or require complete recertification versus just a detailed letter from the third-party evaluator attesting that equipment are equivalent. Majority voted for the detailed letter from the evaluator as sufficient initial submittal. The final conclusion in a nut shell:

**Vendors who acquire equipment from another vendor and put their name on it but want to rely on the original vendor's third-party certification to be listed must submit a detailed letter from the third-party evaluator explaining if the two equipment are identical and describing how that determination was made. The work group team reviewing the letter will decide if the letter is adequate and convincing; if not additional documentation may be requested to support vendors' claim. It was also decided that work group teams will need to go back and apply this criteria retroactively. Vendors that do not submit proper documentation will be put under review or taken off the future lists as appropriate.**

There was also discussions on the benefit of cross-referencing equivalent equipment on the list. Some members stated that vendors do not want this to be done and in some instances have implied lawsuits, if this was done. Some members felt that if vendor does not want the equipment to be cross-referenced a full third-party certification for the copy equipment must be done. No decisions or action items were concluded as a result of these discussions. However, the general consensus was that cross-referencing will not be acceptable to the vendors.

Lamar presented the licensing issue of the SIR vendors. When the SIR vendor allows an entity to use their software to provide service, if the arrangement is like tank testers purchasing an equipment (while maintaining the original name of the equipment) a separate listing seems redundant. However, if the new entity operates independently as if they have their own software version and do not include the original vendor's software version on the test report, then a separate listing may be necessary. SIR team members will make such decisions within their group.

Other situations which may be similar but not quite the same have to be decided upon by the team members by applying a philosophy consistent with the above discussions.

### III. Multiple Evaluation Dates

The issue of including all evaluation dates and whether they are considered a revision or an addendum or re-evaluation was brought up. This topic was tabled. Curt will continue listing all evaluation dates and on special cases clarify the matters through direct discussion with the team leaders.

### IV. Approved and Under-Review Protocols

**All team leaders will provide cover page of all the protocols to Shahla by March 24th.** Shahla will have those typed and as close to the final as possible and forward it to Curt. It was

decided that approved protocols will be included in the list but under-review protocols will be only for the work group use.

#### V. Maintenance Checklists

ATG maintenance checklists prepared by Shahla for California's ATG booklet had been provided to the work group in the previous meetings. Comments were only received from Russ and were incorporated. It was decided that these checklists will be included in this 3rd edition list, if possible. Shahla will provide disk copies to Curt. **Rough draft of line leak detector maintenance checklists were distributed by Shahla, comments are due to her by April 15, 97.**

#### VI. Companies Out-of-business (no technical support available)

The issue on the table was the companies that have sold leak detection equipment to tank owners or tank testers but are not in business anymore and/or no longer provide technical support. Should this equipment be maintained on the list with comments indicating that it is no longer manufactured or supported by the manufacturer, should be all put together as an appendix of equipment no longer marketed or supported, or taken of the list? There were also discussions on team members calling vendors to get updated on the availability of the products and product support. Decision on this matter was deferred to the next meeting (Curt remember to include this in the agenda) for consideration for the 4th edition of the list. Currently, some equipment already have that information included in the comment section of the specifications page.

#### VII. Work Group losing the SIR king.

Lamar is planning to retire from the work group, so he can dedicate more time to the state tasks. Work group voted on sending a thank you letter for Lamar's contributions to the work group addressed to his supervisor and also request extension of his membership with the work group possibly for another year. Dave Wiley was volunteered by the team members to draft the letter. Dave graciously accepted the nomination (and has prepared a draft language).

#### VIII. Team Leaders' Headline News

1. SIR team, Lamar Bradley: Manifolded SIR addendum protocol (August 1996) has been provided to all vendors as well as a follow-up letter from Lamar (1/10/97), explaining to the vendors what will happen to their specification sheet in the list if additional data is not provided for review to confirm application of their method for manifolded tanks. Simmons is the only company that has submitted additional information. All of the SIR listings in the 3rd edition (current edition) will be revised to reflect Lamar's 1/10/97 letter's statements. Development of the SIR protocol by Ken Wilcox under a contract with Edison is suspended due to lack of money. Ken has volunteered to finish the protocol at his own time. Ken would like to know if work group will be interested in review to assist him in the development of that protocol. Eight of the ten members voted to pursue this review. SIR subcommittee will put together a review team, Shahla requested Lamar to keep California involved in the process.

2. ATG, Ellen Van Duzee: There are a few large tank ATG evaluations under review. Ellen requested work group to discuss and vote on the issue of listing ATG systems for use at less than 50% product level as vendors have been requesting. This item was moved to the Thursday morning agenda. Shahla mentioned to Ellen that Marley pump has a third-party certification for their ATG for tank sizes up to 75,000 gallons. The evaluation was done in accordance with the procedures in the alternate process described in the standard EPA protocol as well as the manifolded section of the CITLDS protocol. Ellen does not have the report and was not aware of it, she will arrange to get the information from Marley. Shahla will also remind Marley pump to submit complete documentation to the ATG team members.
3. Non-volumetric TT, Shahla Farahnak: Two evaluations under review. Responses from the two vendors eventually received. Not much activity in this category.
4. CITLDS, Shahla Farahnak: The letter that was mailed by Randy Nelson before he left the work group is on hold and it was decided in the previous meeting that before mandating the items requested in that letter (field testing) it should be sent out for comments. Shahla has not done this yet. **Shahla is now committed to send a letter out by May 15, 97 requesting comments from the vendors and evaluators who were involved in the review of the CITLDS protocol.** No new CITLDS evaluations have been submitted. Incon is going through phases of re-organization and they have tentatively withdrawn their application for review of their CITLDS third-party evaluation. They never submitted the supporting documentation that Shahla had asked them to send.
5. Volumetric TT, Beth DeHaas: Comments regarding Universal Sensors specification sheet for large tank will be discussed with Shahla and Russ before leaving the meeting. Russ is finalizing the review for the APT system (The TT method that we all observed in Traverse City, Michigan). Beth has eventually received the data log sheets for AES underfilled test method (currently under review), and is reviewing them.
6. Pipeline test methods, Mike Kadri: No news is good news. Not much to report. A few evaluations were submitted, they have been reviewed and will be included in the list. Marley's FXV (V stands for vented) paper work was not submitted to Mike. Shahla will ask Marley again to send the information for review to Mike and Jeff Tobin.
7. Sensors, Dave Wiley: The list is getting very long. Dave proposed putting all interstitial sensors on a summary table. There was concern that it may make use of the list cumbersome. There were also discussions on the listing of

discriminating (differentiate between water and fuel) and non-discriminating sensors. Water-only sensors will remain off the list.

**Thursday March 14, 97**

I. Product level specification for ATGs and volumetric tank test methods:

A lot of discussion on this topic. Ellen suggested that no ATG equipment to be listed for under 50% application, because it will not properly detect leaks at low product levels. Team members even though technically agree with Ellen's concern, but in general believe that this is a state regulatory issue and work group's listing should be consistent with the protocol. It was also suggested that if the protocol has flaws, then may be in future ATG team may want to consider proposing changes to it. There was also discussions on whether there is a need to have the ATGs tested by third-party at low product levels, or whether calculations to extrapolate thresholds are appropriate or needed. Shahla proposed a motion and was quickly volunteered by work group members to write down the motion for resolving this matter and a vote will be casted on this matter in the afternoon after every one has had a chance to read the motion. The motion was approved in the afternoon by the majority vote. The ATG and Volumetric TT committees will finalize the language to be included in the list and will prepare letters to notify vendors of the work group's criteria that will be used for product level specifications of ATGs. The write up of the approved motion was given to Beth DeHaas, but in a nut shell it states the following:

- \* Calculations required in the ATG protocol to show that system performs equivalently well at 50% and 95% must be performed by the evaluator and submitted for review. Actual testing at below 50% is not required. The comment section of the list will include the levels at which the system was tested.
- \* Evaluator must specify the minimum product level that the system may be used. This statement must be supported based on the technical and physical limitations of the system (e.g. temperature and product and water level sensor location ). Statements such as, "In accordance to the vendor this system can operate at 10% or so" are not acceptable.
- \* Revised certification sheet that includes the approved product level range must be submitted.
- 4. Comment section of the specifications sheet will include a comment on the "EPA requirement of testing portion of the tank that routinely contains product". Same comment will be included for underfilled volumetric TT methods.
- 5. Expand the existing comment that is in the specifications sheet regarding effect of low product level on leak rate to include a statement that "consistent testing at low levels could cause missing a leak". Similar language will be used for the underfilled volumetric test methods.
- 6. For underfilled volumetric test methods criteria consistent with the protocol will be applied to decide on the product level specifications.

In cases of combined ATG and volumetric protocols used to evaluate systems, Russ and Beth will talk to Ken to may be have him write down the procedure.

## II. Additional Footer Language for the List

Existing footer that appears on every page of the list will be expanded to include a statement similar to "System must be used consistent with all applicable laws and regulations".

## III. SIR and Hazardous Substance Tanks

Bill Faggart brought up the issue of possible intent for use of SIR after 1998 for hazardous substance tanks. Should the list include information stating that SIR is not applicable for hazardous substance tanks? If so, based on what criteria? No decisions were made on this matter as an action item for the work group. It may be a matter that EPA has to deal with, if necessary.

### III. Gains in excess of threshold

Shahla stated that some SIR companies do not think that gains in excess of threshold are fails/inconclusive. There was a **letter submitted by a vendor (this vendor recently requested that their letter not to be distributed or shared with other vendors)** stating that the false alarm rate will be doubled if they want to include gains as fails or inconclusive. The general consensus was that a gain is an indication of unusual operating conditions and a gain in excess of threshold can not be ignored as a "pass". It was suggested that the leak threshold section of the list specify that both gains and losses are to be considered in determining tightness of the system. **It was agreed that this will be done (future lists?). Dave Wiley will also consider the possibility of a clarification letter from EPA regarding gains.** This matter may be discussed again in the next meeting (Curt another agenda item for the next meeting).

### IV. Under-Review Protocols & Review Teams

All the under-review protocols were listed and review teams and team leaders were assigned (see attached).

### V. Vendor Presentations:

This part of the meeting was open to vendors. Peter Hut of SIR Monitor made a presentation on their temperature compensation model. This is an internal feature of their existing third-party certified SIR software, they like to market it to other vendors to use to get better results. Copy of the presentation will be included with the minutes, if provided by Peter to Shahla.

Group discussions with all vendors present included items like throughput, gains reporting, licensing, tank chart and meter calibration errors.

#### VI. Next Meeting

Next meeting will be in Montana or Idaho. Jeff Tobin and Ellen Van Duzee will be in touch with Dave Wiley to finalize location. **Bill Faggart was drafted to take minutes for the next meeting.**

#### VII. Leak Detection Equipment Surveys

Ellen would like to lead a team to do a nation-wide survey on effectiveness of leak detection, using data from future tank removals. It was voted (majority vote) that work group will not actively pursue this as a work group task, because it is not consistent with the mission statement. However, those interested will independently work with Ellen on this survey.

#### VIII. Tank Integrity Assessment

Dave Wiley brought up this to ask if the work group involvement was appropriate. Work group's decision was similar to the above mentioned leak detection survey issue. Not a work group task, but members interested will be in touch with Dave on this matter.

#### **Enclosures**

List of attendees

Hand written original notes approved during the meeting regarding the ATG product level issue

Copy of SIR team's letter to vendors regarding manifolded tanks (1/10/97 letter)

List of under-review protocols and team members assigned for review

## ATTENDEE LIST

### State Representatives

<u>NAME</u>	<u>STATE</u>	<u>PHONE NUMBER</u>	<u>INTERESTED IN BECOMING WORK GROUP MEMBER</u>
Lynn Svendson	Mississippi	(601) 961-5075	No
Dick Piper	Colorado	(303) 620-4301	No
Allen Martinets	Texas	(512) 239-2182	<del>Maybe</del> no
Ramiro Garcia	Texas	(512) 239-2038	Maybe
John Kneece	South Carolina	(803) 734-5601	Maybe
Brian Wisnewski	South Carolina	(803) 734-5331	Not at this time
Lori Terry	Kentucky	(502) 564-6716	No
Stuart F. Gray	EPA-Region 1	(617) 573-9655	No
Tom Burns	EPA-Region 1	(617) 573-9663	No
Joan Coyle	EPA-Region 1	(617) 573-9667	No
Michael Brush	Idaho	(208) 334-2370	No
Doyle Mills	Kentucky	(502) 564-6716	No
Sam McDuffie	Arizona	(501) 682-0973	No
Terry Perry	Arizona	(501) 682-0987	No
Lynda Perry	Arizona	(501) 682-0979	No

### Vendor Representatives

Howard Dockery  
Clif Miller  
Sam Gordji  
Pete Hut

Simmons  
USTMAN  
SSG Associates  
Hut Resources, Inc.

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