

NATIONAL WORK GROUP ON LEAK DETECTION EVALUATION

SUMMARY OF MINUTES FROM THE SEMI-ANNUAL MEETING MARCH 17-19, 1999

DAYTONA BEACH, FLORIDA

MARCH 17, 1999, 1:30-5:00pm

Attending:

1. David Wiley, U.S. EPA
2. Timothy Smith, U.S. EPA
3. Juan Sexton, Kansas Department of Health & Environment
4. Luther Lengel, Pennsylvania Department of Environmental Protection
5. Howard Barefoot, Georgia Department of Natural Resources
6. John Cochran, New Mexico UST Bureau
7. Gary Astin, Utah Department of Environmental Quality
8. Laura Chaddock, Yolo County (Calif.) Environmental Health
9. Jeff L. Tobin, State of Montana Department of Environmental Quality
10. John Kneece, South Carolina Department of Health & Environmental Control
11. Jon H. Reeder, Florida Department of Environmental Protection
12. Curt Johnson, Alabama Department of Environmental Management
13. Ed Olson, Minnesota Pollution Control Agency
14. Russ Brauksieck, New York State Department of Environmental Conservation
15. Beth DeHaas, Maine Department of Environmental Protection
16. Shahla Farahnak, California State Water Resources Control Board
17. Jennifer Bravinder, U.S. EPA (minutes taker)

INTRODUCTIONS

Each person introduced themselves and gave their organization and interests in leak detection. Curt explained teams for each leak detection method.

TEAM LEADER UPDATES

1. CURT JOHNSON: Administration

- Work Group policy memos:
 - 3 policy memos which establish rules and procedures for the work group were distributed for review. Once finalized, they will be posted on the EPA OUST web site.
 - Policy Memo #1: “Summary of Work Group Ground Rules”
 - Policy Memo #2: “Filling Work Group Vacancies”
 - Policy Memo #3: “Summary of Work Group Procedures”
- User survey
 - Curt recently updated it with summary for responses from 6/97 - 3/99.

- Jerry Flora's summary of SIR protocol issues and approaches was distributed.
- Next draft List and next version
–There will be an electronic version only (hard copy is once a year prior to National Conference) targeted for July 1999.
- Vice-chairperson:
–The Work Group voted in Shahla Farahnak as the new Vice-chairperson.
- Y2K:
–The Work Group decided to survey vendors on the List regarding Y2K preparedness of leak detection systems. The survey results will be made publicly available.
- Horner:
–State regulators received a letter from Brad Estabrook (new president) stating that the company requires recertification of technicians every 2 years.
–Since some states have not received the Estabrook letter, the Work Group will provide it to the Association of State and Territorial Solid Waste Management Officials for wide distribution.

2. DAVID WILEY: Sensors

- The Team completed a new format for liquid and vapor sensor listings which will appear in the next version of the List.
- Two evaluations need to be reviewed: Containment Solutions' evaluation of temperature effects on liquid brine level and one new sensor.
- Steel Tank Institute: did a post-installation check for a PermaTank (jacketed tank) to evaluate interstitial space monitoring.

3. JEFF TOBIN: Pipeline and non-volumetric tank tightness testing

- There has been a lot of work on bulk piping; will discuss under new business.
- Piping: new listings or changes to listing have been made for HassTech Model 2001J, Marley CPT Pro-Link, Vaporless 99LD series, and Veeder Root LLD 300.
- Tanks: No new listings or changes.

4. JON REEDER: Statistical Inventory Reconciliation

- Triangle Environmental: will be removed from the "under review" list. There have been no responses to several information requests.
- Teledata: The listing needs to be changed; it was reviewed as a stand-alone system and needs to be identified as such.
- SIR International: The Team will look into whether we need to review versions 2.6 and 2.7.
- EnviroSIR: needs to be added to the "under review" list.
- There is no EPA-approved protocol for (1) stand-alone systems, (2) manifolded systems, or (3) imbedded systems (in which the SIR system is imbedded in the ATG).
–On the last issue, the existing protocol is very unclear on SIR system handling strictly data from ATGs.
–The #1 issue emerging from the state caucus, held during the national conference, on UST side was a new SIR protocol.

- Since there may be issues about SIR and other protocols, California is going to conduct a survey of the states on the effectiveness of current leak detection method evaluation protocols. The survey results will be made publicly available.

5. RUSS BRAUKSIECK: ATGs and Volumetric Tank Tightness Tests

- No activity on volumetric tank tightness tests.
- Lots of activity on ATGs: 4 companies with 8 evaluations
 - All the evaluations are straightforward;
 - Getting evaluations for Veeder Root and Gilbarco's same equipment.
- New activity for bulk tanks:
 - 17 different evaluations, and 8 companies.
 - Bulk tank protocol: scaling factor remains an issue.
 - Some reviews are done, but waiting for protocol concerns to be addressed.
- Renewed activity on protocol for ATG's used on manifolded tanks. Ken Wilcox Associates has 2 evaluations to do once this protocol is complete.
- New probes with same ATG computer: companies want a protocol to look at or dissimilar/similar probe output/performance with software. The performance standard for the new probe would be "as good as or better than" the performance of old probes (will discuss with Team).

6. SHAHLA FARAHNAK: Continuous In-tank Leak Detection Systems

- Two evaluations will be removed from the "under review list": Alert Technologies (the evaluation was conducted before a CITLDS protocol existed) and Incon SCALD (no response was received to the Team's request for a complete evaluation data set).
- 3 evaluations are pending: Red Jacket, EMCO, and Arizona Instruments
 - Problem is that vendors did not provide additional data or the right format of data.
 - All will remain on the list of "under review" until the Team receives and reviews the complete evaluation data set and other missing information.
- History of CITLDS protocol: Shahla reviewed the history of the protocol's development. Due to some portions of the protocol being unclear and due to improvements in the way data can be presented, the Team is working with Jerry Flora on an addendum to the protocol. The revisions will not be major, but will instead clarify the existing protocol so that the evaluation procedures are clear to both vendors and evaluators. When finished by the Team, it will be distributed to vendors and to Ken Wilcox Associates for its web site.

OLD BUSINESS

- The Work Group identified the issue of USTMan/Watson and the need to clarify whether the Watson name remains (and therefore no support for "stand-alone" systems) or whether USTMan is going to put their name to it.
 - The SIR Team will look into Watson methods on List to determine whether they are stand-alone and were evaluated as stand-alone.
- Mallory Controls is replacing dysfunctional sensors that are no longer manufactured.
 - It's important to retain a statement on the Mallory equipment spec. sheets that the

- product is no longer manufactured.
- Sensors: Need to state in spec. sheet whether it is discriminating or non-discriminating and differences of use between them.
- Vista Research conducted an evaluation for bulk tanks before the protocol was reviewed and accepted by the Work Group. There are a variety of technical issues to resolve. The team working on the issues has a course of action it is following.
- Veeder Root Simplicity is in its third version; has auto-dial via satellite.
 - Issue is that if the auto-dial is not functional, the system won't alert Simplicity headquarters about an alarm, and the alarm may not be discovered until a company representative visits the site, which is done monthly.
 - California inspectors saw the problem, and it's being fixed by having an alarm alert on-site.
 - There have been some other problems, so Veeder Root is waiting to gather them before rewriting the software.

MARCH 18, 1999, MORNING: PUBLIC PORTION OF MEETING

Attending: Work Group members, leak detection vendors, evaluators, state and local regulators, and interested members of the public.

VENDOR PRESENTATIONS

#1: William Premaza & Donald Boren of AST Test Service gave a presentation on “Mass Balance System for Leak Detection in Large ASTs.” A full report was distributed at the meeting.

#2: Bill Middleton of the Defense Supply Center presented an award to Shahla Farahnak for her work in assisting the Department of Defense to achieve compliance with the California UST requirements for bulk tanks.

#3: Ken Wilcox of Ken Wilcox Associates gave an impromptu presentation on the use of averaging and scaling in bulk tank leak detection evaluations.

#4: Warren Rogers of Warren Rogers Associates Inc. gave a presentation on the history of the evaluation protocol development for statistical inventory reconciliation (SIR) and new developments in SIR methods.

MARCH 18, 1999, AFTERNOON

Attending: Work group members only

DISCUSSION OF VENDOR PRESENTATIONS AND RELATED ISSUES

- The Work Group discussed the vendor presentations.
- The Work Group began drafting a policy statement to establish clear criteria for the Work Group to review only those evaluations that have been conducted under an accepted protocol. The final policy statement will be added to the existing policy memos, which are in the process of being updated (see Administration Team Leader update from 3/17/99).
- The next meeting will be held in San Francisco in September and coordinated by Jennie Bravinder.

MARCH 19, 1999, MORNING

Attending: Work group members only

OLD ITEMS

- Watson: John will send a letter to USTMan about removal of this SIR listing that appears to no longer be supported by a company.
- Bulk pipelines:
 - Must operate pipelines at pressure equivalent to pressure during the evaluation. This needs to be very clear on the spec. sheet.
 - Airport hydrant fueling systems: Not tested continuously.
 - The Team has reviewed 3 evaluations (Tracer, Caldon, Vista) and has some questions on each one which will be asked of the evaluators. One common theme is that evaluations are done on straight piping, which needs to be stated on the final listing of the evaluation and its limitations.
- Jon on listing of stand-alone SIR systems: There should be some qualification of the accepted protocol being used for a system with features that are not explicitly addressed in the protocol.
- Administrative items (David):
 - He handed out the original concept paper for the work group and noted that the Work Group is exempt from the Federal Advisory Committee Act.
- Probe test procedure (Beth):
 - The Team has reviewed language drafted by KWA. It sets forth a test procedure, not a protocol, to compare probe performance.
 - 2 companies are ready to have evaluations done once the procedure is finalized.
- ATG protocol (Russ):
 - The Team conducted a mass mailing to invite comments on the protocol written by Jeff Wilcox.
 - The protocol needs further changes, which the Team will address before routing it to the rest of the Work Group for review.
- API study: The Work Group agreed to send a letter to API informing them of the Work Group's purpose and asking whether API would like the Work Group involved in its study.
- STI PermaTank vacuum test: Purpose is for tank tightness test during installation. It was

evaluated by KWA.