

## NATIONAL WORK GROUP ON LEAK DETECTION EVALUATIONS

Minutes of March 13, 1994, meeting in St. Louis

**Members present at the meeting:** Curt Johnson, David Wiley, Randy Nelson, Lamar Bradley, Russell Brauksieck, Mike Kadri, Shahla Farahnak, Beth DeHaas, and Harold Scott.

**Purpose of the meeting:** The purpose of the meeting was to practice speeches for presentation at The 6th Annual UST/LUST National Conference (St. Louis) and to strategize for the first publication of the National Work Group on Leak Detection Evaluations List.

Each Subcommittee met to discuss specific issues and the following issues were raised:

### Volumetric

-ATGs that are evaluated under the ATG Protocol (0.2 gph) do not necessarily qualify under the Volumetric Protocol (0.1 gph) for precision testing. Additional review will be required to determine which protocol is most applicable.

-It was reported that MRI considers at least 20 tests provide statistical validity.

-Leak rate should be a reasonable scatter around the leak test (eg. 0.05 range between 0.025 - 0.075) or on both sides of target of equipment capability.

-Large tanks present unique problems because of temperature spread and the need for temperature stability. Protocol specifies a +/- 5°F; it was agreed that the 5°F variation could be in one direction too.

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-(AD HOC discussion between Curt Johnson, Beth DeHaas, and Harold Scott dealt with the situation when one vender purchases equipment from another manufacturer. It was agreed that the new vender will have to obtain a letter from the Evaluator specifying that the equipment is identical to the equipment originally certified.)

### Nonvolumetric

-Randy noted that a line pressure test is so accurate and inexpensive that it is used as an annual line test (quantitative) whereas with the Tracer test (qualitative) requires the migration of the petroleum product to the sensors. Mike noted that the Tracer test could be used for the monthly test as a replacement for the annual pressure test (280.44(c)). It was suggested to keep the Tracer test as a LINE TEST on the list for the Monthly, but not for the Annual test.

-Randy indicated that a ullage test could not be conducted on an empty tank unless the ground water is monitored. Therefore, an evaluation should document that key factors (eg. water table, etc.) have been taken into account. He also, noted that the use of a ullage test evaluated using diesel should not be used for a higher vapor pressure fluid.

#### SIR

-Discussion centered around whether SIR could be used to test integrity of the tank and the piping; additional review was required.

-An EPA quick-fix is expected on the SIR Protocol in the next few months.

#### INTERSTITIAL

-Noted there is no Protocol for interstitial monitoring in double-walled tanks, therefore, these type will be listed separately.

#### Other

-It was decided that Evaluators (Certifying Laboratories) will have to submit draft Protocols and experimental design for review by Randy Nelson's Subcommittee for "Other" before evaluations are accepted.

-Extensive discussion centered around which Protocols apply for various leak detection procedures and it was decided until specific Protocols are developed then the existing Protocol that most accurately describes the system will be used.

-Randy will review all "Others" and will decide which truly fit into the "Other" category.

#### **Schedule for National Leak Detection List**

-Update List every six months; during the interim the updates will be documented in a letter from the appropriate Subcommittee with a copy to the Work Group Members.

-April 8, 1994: Each Subcommittee will send Harold a copy of the California List (summary and specification sheets), marked in red.

-April 22, 1994: Harold will send each member a copy of the draft list.

-May 6, 1994: Each Subcommittee will send comments to Harold

-May 16, 1994: Final Draft will be compiled by Harold for distribution.

August 16, 1994: FINAL real list (This is the second draft which includes the OTHER category).

-Transmittal letter, disclaimer, and LOGO will be decided by member review before the next meeting

-Distribution of the National List will be handled by NEIWPCC.

-EPA Region 10 list will be printed a few more times until the National List is established.

#### **Future Meeting**

-Next meeting will be in Seattle during June 23 - 24, 1994.

-Russell Brauksieck agreed to be the secretary for the Seattle meeting.

-Randy Nelson agreed to serve as Facilitator for the Seattle meeting.

Respectfully submitted:

Harold Scott  
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