

NATIONAL WORK GROUP FOR LEAK DETECTION EQUIPMENT REVIEW

Minutes of February 18 & 19, 1994 meeting (in Tucson)

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

Distribution: handouts from the Work Group members were distributed.

Items:

1. Review of Policy #1 (Summary of Work Group Ground Rules) - The policy was reviewed by the group. It was proposed and accepted by consensus vote that item IV.A. to be revised to include "within two years".
2. Review of Policy #2 (Filling Work Group Vacancies) - The policy was reviewed and approved as written by a consensus vote.
3. Randy Nelson's Report -

The Liquid Contact Point Sensor & Liquid Contact Cable Sensor evaluation protocols written by Marc Portnoff are acceptable.

Standard Non-Volumetric Protocol for tracer method does not address the effect of soil moisture.

Randy will continue to review the alternate protocols including various protocols used for evaluating continuous ATGs, protocols for evaluating interstitial-space monitoring, flexible piping evaluation protocol, testing protocol for lined tanks, etc. Randy will also review and comment on the modified protocol for testing large tanks as proposed by Ken Wilcox.

4. David Wiley's Report

It was proposed that Harold Scott continue (as decided in previous meetings) to work on the leak detection equipment list generated by the Work Group. This equipment list to be mass produced by NEIWPC for distribution to interested parties. (It may be possible for NEIWPC to charge a nominal fee per copy in order to generate a source for continued funding support the Work Group). All members voted in favor of this proposal. David Wiley will work on this issue as part of the EPA's new contract negotiations with NEWPIC (or other potential contractors).

5. Beth DeHaas' Report

Copy of the draft ASTM-SIR Practice is available and ASTM members should review it and become familiar with it. When the ASTM-SIR Practice is ready and out for comments, Beth will provide the group with copies. The group discussed whether "Third-Party Evaluator" should be defined by the Work Group and if so, whether language similar to the draft ASTM-SIR Practice may be acceptable. After lengthy and extensive discussions the Work Group decided, by majority vote, not to attempt to define the term. It was decided that criteria for third-party evaluations will be established by the Work Group for the purpose of reviewing equipment.

6. Logo

A proposed logo was voted on and approved. Russ Brauksieck accepted the responsibility for having a computer design prepared and presented to the Work Group for final vote.

7. Criteria for Reviewing Leak Detection Equipment:

The following proposals were discussed:

- a. Simulated leak rates during the evaluation shall be kept blind to the equipment manufacturer or its representative.
- b. The equipment shall be third-party evaluated.
- c. Vendor should not provide the evaluation data to the third-party evaluator (with some limitations if necessary)

Items "a and b" were accepted by a consensus vote. Proposed criteria "c" was rejected by the majority vote. However, it was agreed that for the benefit of the states who may be concerned about the criteria "c", data sheets will comment on the source of data used during the evaluation as applicable.

8. Report by Subcommittees

Volumetric Subcommittee:

The equipment will be listed using the California's LG-113 format. Date of third-party evaluation will replace the state review date. Underfilled and overfilled test methods will be listed separately. This subcommittee also presented a copy of the check list developed for stream lining volumetric test method reviews.

Non-volumetric Subcommittee:

Due to the different nature of the various test methods in this group, three basic categories were discussed: ullage test, tracer method, vacuum test. The equipment will be listed using the California's LG-113 format. Date of third-party evaluation will replace the state review date. Modifications in some of the specification sheets will also be made (reference to ground water effects, method of data collection, permeability information for tracer methods).

Automatic Tank Gauging Subcommittee:

The equipment will be listed using the California's LG-113 format. Date of third-party evaluation will replace the state review date. Minimum product level specification will be 50% (as decided by the group in the previous meeting). Waste oil will not be included in the list of products unless the equipment is specifically tested and certified for use in waste oil tanks. The statement "Temperature and level sensor must be maintained and calibrated according to manufacturer's instructions" will be included if no information is available on the calibration and maintenance frequency or if the box "never" is marked in the evaluation sheets.

Vapor Sensor Subcommittee:

The equipment will be listed similar to the California's LG-113 format. Date of third-party evaluation will replace the state review date. Response time for specificity results, range and incremental detection limits will be added. A comment section will address specific information which may be useful for the states using the list.

Liquid Sensor Subcommittee:

California's LG-113 format will be closely followed. Date of evaluation will be included, as well as information to indicate if the sensor is a destructive type (sensor is destroyed upon detection of the material to be detected). The comment section will address limitations of the evaluation protocol and other pertinent information.

Line Leak Detectors & Line Test Method Subcommittee:

The equipment will be listed similar to the California's LG-113 format. Date of third-party evaluation will replace the state review date. Pressure criteria for suction line testing will be added. The test pressure for suction lines will be listed as 7-15 psi range. (The minimum is based on the statement from the preamble to federal regulations - page 37167).

Statistical Inventory Reconciliation Subcommittee:

The equipment will be listed similar to the California's LG-113 format. Date of third-party

evaluation will replace the state review date. Items of the LG-113 which are specific to California regulations will be deleted. Comments will reference source of data for the third-party evaluation and testing of hydraulically-manifolded tanks.

Cable Sensor Subcommittee:

These will be listed separate from the point sensors. The format will be similar to liquid point sensors.

9. Attendance at the National UST/LUST Conference

Every team leader should give a generic specification sheet for each test category to Harold Scott By February 25, 1993.

The following members will make 10-minute presentations at the conference: Shahla, Lamar, Beth, Randy, and Curt Johnson (15 minutes). Curt Johnson will also mention that the group currently is reviewing systems for which third-party evaluation was completed and final report was prepared by January 1, 1994.

10. Election of the Secretary

Harold Scott was elected to be the secretary for the next meeting (St. Louis).

11. Equipment Review Deadlines

The following deadlines are the target points for the process of preparing the first equipment list:

Generic data sheet for each test category (excluding company name, address and test name) due to Harold by **February 25, 1994.**

All members to receive complete information for equipment reviews from manufacturers by **March 13, 1994.**

✓ Harold to start compiling the master list **ASAP** and the members feed specification sheets to Harold as they are prepared. Final drop-dead date for this is **April 8, 1994.**

✓ Subcommittee leaders to summarize rejection reasons (if any) and mail to the Work Group members by **April 8, 1994.**

Harold to complete the list and mail to the Work group members by ²²**April 15, 1994.**

Deadline for feed back and comments on the list from the Work Group members to Harold by ~~April 22~~, **1994.**

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Harold to mail the list to the states and vendors by ~~April 29, 1994.~~

12. Other items

Shahla Farahnak explained to the Work Group the limitation of the volumetric tank testing methods at a low product level and reference was also made to a supporting article by Marcel Moreau (L.U.S.T.LINE, January 1994 issue) on effect of product-level on tank testing. Shahla also distributed a copy of the general concerns on leak detection equipment evaluations to the members.

Beth DeHaas discussed some of the concerns the volumetric subcommittee has regarding some of the reviews. More specifically two-for-one tests for ATGs was discussed. This is the cases where one set of data is used to certify the ATG for the 0.1 gph and 0.2 gph test. There was also concern on cases where the test temperatures did not follow the standard matrix in the evaluation protocol.

It was also decided that the automatic tank gauging systems evaluated for 0.1 gph test will be listed under automatic tank gauging category.

13. Subcommittee Meetings

During the last hour of the meeting, subcommittee meetings were held to discuss the progress of equipment reviews.