

Introductions

Team Leader Updates

ATG and VTTT Methods – Mike Juranty

ATG Completed Reviews:

- None at this time.

ATG Under Review:

- None at this time.

VTTT Completed Reviews:

- A typo in the Mass Technology listing for Precision Mass Measurement Systems CBU-1000D was identified and corrected. Purpora Engineering asked for a reduced test time in the listing for the Alert 8200 Series method. As there was no justification for a reduced test time in the third party evaluation, the request was denied.

VTTT Under Review:

- FAFNIR system draft listing has been circulated within the Workgroup for review. 0.05 gph threshold for 0.1 gph test. System tests only at 90% capacity of tank for a 0.1 gph test with 1 psi differential at bottom of tank to account for ground water. This system would be the only method using a magnostriptive probe that is listed to conduct a VTTT. FAFNIR system should be listed on the website early April 2017 under VTTT method.

CITLDS Methods – Shaheer Muhanna

CITLDS Completed Reviews:

- VeederRoot CSLD was reviewed and ready to be listed to include waste oil.

CITLDS Under Review:

- None at this time.

NVTTT Methods – Helen Robbins

NVTTT Under Review:

- None at this time.

NVTTT Completed Reviews:

- None at this time.

Line Leak Detection Methods – Greg Bareta

Line Leak Detection Under Review:

- ATMOS bulk pipeline leak detection method. There have multiple comments back and forth with Ken Wilcox Associates about the wrong protocol used initially (LTT). There are concerns that the adjustments for climate were not accounted for properly. The protocol used for the original ATMOS listing was not on the list to be used. Two questions: Did ATMOS use the 2013 Bulk Pipeline protocol for the original listing submittal? Did the workgroup approve this initially?
The thresholds will be referenced in notes on the listing depending upon where the leak rate falls in the method.
Volume to be listed as the maximum line segment tested.
Question: Does the 1.5X factor apply to the bulk pipe methods?
The 2013 Bulk Piping protocol will be peer reviewed and relisted on the website.
The ATMOS table will be added to the listing. Heather to forward Feb. 2017 email with a copy of the table for the bulk pipe/hydrant method.
- Leak Detection Technologies (1,000,000 gal) revised 2015. This listing will be pulled from the list until a valid volume for testing can be determined. The test protocol was reviewed and the listing needs to be changed to 201,690 gals (X2 on piping, X1.5 on ATG). Heather will follow-up.
- VeederRoot PLLD. A change in the listing is needed for ELLDs in the bulk modulus. A combination of FRP and Flex piping. The 1100gal max can be exceeded with more FRP piping. VR wants it to be listed regardless of piping type. We need VR to provide a range of piping used in a combination run (max rigid vs. max flex).
It was suggested to have the needed vital information added to the listing without requiring additional testing (8590 PLLD). It needs to be stated how it was tested, not the minimum (What was it tested at?).
A proposal was made by VR to remove the minimum capacity and remove the reference to ATG model 450 (8600 series).
- Franklin Fueling has requested some changes to their listing for the TS-LS500 ALLD. They would like to add comments regarding the lower bulk limit that may apply as well as adding the higher limit.

Line Leak Detection Completed Review:

- None at this time.

SIR Method – Shaheer Muhanna

SIR Under Review:

- Fairbanks. There was a title change from qualitative to quantitative. Thresholds were evaluated for 0.05, 0.1, and 0.2 gph. The 0.5 and 0.1 gph need to be verified in the evaluation. SIR team will review and reevaluate the evaluation for Fairbanks. There are concerns over the threshold levels for the qualitative method. There are problems with the calculations that will be discussed and reviewed.

SIR Completed Review:

- None at this time.

IM and Out-of-Tank Detector Methods – Tim Smith

IM and Out-of-Tank Detector Under Review:

- Steel Tank Institute
 - The submittals have been returned to STI for rework since April 2013. The Work Group has answered subsequent questions from STI in correspondence dated April 15, 2013, May 1, 2013, and December 12, 2013. As of late 2016, STI was still interested in completing this effort. No further information.
 - Revise the listing for Permatank Interstitial Monitor for Detection of Air and Liquid Leaks – Interstitial Tank Tightness Test Method
 - Add a new combined listing for the STI-P3® Act-100® and ACT-100U® Double Wall Steel Underground Tanks Interstitial Monitor for Detection of Air & Liquid Leaks
- Tank Tech, Inc.
 - Review Braddock Method using vacuum on the interstice of an In-situ Upgraded Tank
 - Method was evaluated using Non-Volumetric Tank Tightness Test Method (Vacuum). Tank Tech (Braddock Method).
 - Misunderstanding on inches of mercury vacuum and Tank Tech will meet with KWA.
 - The manufacturer and the third-party evaluator have been informed that this discrepancy will need to be resolved before NWGLDE can take further action.
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- Veeder-Root
 - There have been requests (25 evals for IM sensors) to have ethanol blends added to their listings. A template will be provided to the team to assist with sensor listing reviews.

IM and Out-of-Tank Detector Completed Review:

- None at this time.

AST and Bulk Storage Tank Methods – Peter Rollo

- No methods under review or completed.

Secondary and Spill Containment Test Methods – Marcia Poxson

- No methods under review or completed.

Administration – Heather Peters

- \$17.00 was collected from each member of the workgroup for fees to maintain the NWGLDE website (readyhosting.com)

Update on “Under Review”, “Not Listed”, “Review Completed” – Helen Robbins

- Peter provided some update on the revised protocol for MassTech (the wrong protocol had been used).
Don/Greg provided a brief update on four listings under review. Greg will submit an update to Helen.
Helen provided forms for under review submittals. Helen also to drop “reviews completed” forms from the list. Helen to collect the new forms after the meeting and create a new spreadsheet.
Tim informed the group that SGB has been removed from the list and no response from the vendor.

Old Business

Remanufacturing Equipment – Tim Smith

- PMP (Remanufactured VR). PMP went through Ken Wilcox Associates for evaluation of their remanufactured ATG. PMP is opting out of the NWGLDE listing and their intention is to have a 3rd Party evaluation without the workgroup listing. Helen to move PMP to the “not listed” category.

Recommendations for threshold for Large Diameter Pipe (LDP) – Heather Peters/Tim Smith

- LDP will need a name change. There have been requests to NWGLDE to not change the name of the method to include the reference to th specific type of facilities. .
A proposal was made to include at the bottom of the listings a reference to “formerly listed and do not meet the 2015 EPA requirements” or create a new category.
A proposal was also made to leave the title to reflect the revised 2015 EPA UST regulation. The name of the methods will reflect the federal USTs upon which this workgroup is based.

ATG Protocol for comparison for ELLDs – Greg Bareta

- There was a brief discussion that VR needs to develop their own testing protocol.

The discussion moved back to the ATMOS listing protocol that needs to be reviewed and the transducer calibration requirements. It is recommended every two years but is not necessary because of low usage. Dave to locate the last protocol used.

PAP Manual Update – Tim Smith

- No changes have been made. Tim will review the manual and send out to the team with highlights of any missing information.

File Retention Committee, status of scanning and access to files – David Wilson, Helen Robbins

- The project is 50 percent complete and still progressing. There was recent correspondence from Lamar and it was decided that documents will go to Helen in the interim. Dave to continue the framework project on the member page (historical documents).

Calibration on Listings – Heather Peters/Don Taylor

- AST Method/Bulk UST Method. Tim informed the group that the federal definition of underground storage tank covers both ASTs and USTs. If a tank system, for example, having both ASTs and USTs meets the 10 percent threshold (i.e., volume is 10 percent or more beneath the surface of the ground), that tank system is an UST system and regulated under the federal UST regulations. However, to avoid dual regulation, ASTs must meet SPCC requirements, not UST regulatory requirements. Field-constructed tanks can be aboveground or beneath the surface of the ground. Aboveground field-constructed tanks follow the SPCC rules as required per EPA. A proposal was made to rename as Bulk Tank Methods.
Marcia and Peter to take the lead on notifying vendors of the bulk tank method about the regulation change requirements and existing listings.
- Out-of-Tank Methods (new vapor monitoring regulations). A site assessment must be conducted to verify site use approval. There are no effects on the method listings.
- There are upcoming submittals for sump test listings.
- CITLDS will fall under the ATG requirements in the revised EPA regulation.
- VR has proposed a test system for ALLDs by self-testing without the need of a service provider. EPA regulation left this open for accommodation in the future.
- EPA regulation allows for flexibility to utilize PEI RP 1200 for testing of sumps, secondary containment, and spill buckets. RP 1200 seems to be the generally accepted method for this type of testing.
- There was a brief side discussion that interstitial monitoring is the most stringent. No leak is allowed to the interstice. There was another short discussion about on water disposal from hydrostatic testing of sumps. It varies throughout the states.
- Any new methods of release detection that need review, additionally notify Heather.

Electronic Annual Listing Creation – David Wilson/Heather Peters

- Dave and Heather started a list of what's new (public webpage) and minor changes (private webpage). Minor changes include spelling corrections, address and phone number changes, etc. The posts will occur at the end of each year (December 31st).

Status of Removal of fuel disclaimer from listings – David Wilson

- This was completed during the Fall 2016 meeting.

Other Activity

Team Discussions

- Question from Dave Emmington – There were some concerns about sensor stabilization for FRP tanks. They now utilize a rigid cable for additional support. Does the sensor need to go through further evaluation to make a change on the listing? The workgroup decided that no further evaluation is needed for the listing.
- STI has a revised VTTT/NVTTT protocol. The test was developed by STI and has 3rd Party approval.
 - Lorri Grainawi/Ken Wilcox Associates/Kevin Regan (Tanknology) commented on additional tests for siphoned tanks. Does the 1.5 multiplier apply to single tanks only? 1.5 applies to 2 tanks and 3 tanks. It's only based on what is evaluated (ex. 20000gal on 1 tank, 40000 on 2 tanks). Only used in the field. The evaluation must include how many tanks are siphoned.
- TankTech (tank w/in a tank). No response for a meeting from TankTech.
- Tim – SGB to be delisted.

New Business

Review SIR Listings – Tim Smith

- None at this time.

Review Line Leak Detection Evaluation for AHS and FCT – Heather Peters

- Emphasis on update on work to ensure methods meet the new EPA requirements.
- I review of AHS listings to be conducted. Dave Wilson to pull old listings for dissemination to the team.

Any other listings to review associated with new regulations – Heather Peters

- Nothing submitted as of yet.

Travel/Meeting Agenda Issues – Heather Peters

- Funding has been approved for the next two meetings. There are some issues w/ training costs that will need to be addressed.
- Plans are to have the Fall 2017 meeting in mid-October.

LUSTline Articles – Heather Peters/Tim Smith

- The SIR article is complete and will be sent out to the group for review.
- Two articles are in the process to be submitted. AHS is complete and CITLDS has the draft complete.
- The next articles were discussed for various topics. Evaluator Criteria/How to read AHS listings/SIR – Threshold vs. MDLR.

Policy Review (Review Policy #1 & #2) – Heather Peters

Policy #1 – revised 3/29/2017

- I. Changed member number to 11
- I. Moved C(9) to B
- I.F. Removed number of members per team (next meeting review member checklist)
- III.A(3) added “links”
- III.B. added – changes from previous year will be saved (will be saved on website in downloadable format.
- III.C. deleted
- IV.B. refer policy #4 for presentation criteria
- IV.C. added “approved”
- IV.D. added this and keep language of last paragraph
- VI.A. removed 2 year limit but kept conflict of interest clause

Policy #2 – revised 3/29/2017

- A.I. changed to eleven members, deleted second sentence

B.I(A) added – extension of membership when member is continuing UST project critical to mission of workgroup. (Policy change)

RP 100 Updates – Peter Rollo

- A review of Chapter 9 has been completed. Plan is to have the entire completely reviewed by the end of the year.

Plan to review policies – Heather Peters

- A review and update of Policy 3 & 4 will be completed during the Fall 2017 meeting.

Any other changes to consider? – Any member

- Do we need to define protocol evaluator or peer reviewer? There have been inquiries on the requirements for being a third party evaluator.
- Do we need to establish minimum qualifications to broaden the perspectives for a statement of qualifications? Are the current requirements sufficient enough?
- The group decided to keep the evaluator requirements how they are listed currently on the webpage. No additional requirements to be added.
- An additional statement needs to be added to the links page that the list of evaluators is not endorsed, they are only a list of companies who have provided evaluations for vendors of release detection methods whom submit to be listed on the NWGLDE page.
- SIR Qualitative method is no longer allowed by the federal UST regulations.
- Bulk methods – threshold is now established and listings must meet those for the listing.
- AST/Out-of-tank methods – no changes addressed.
- The intent of the Workgroup listings is to ensure the listed methods stay within what is allowed by federal regulation. Any listings to remain that cannot meet the federal requirements will have a caveat on the listing to reference they do not meet the new federal requirements.

Data Integrity – Tim Smith

- 3rd Party evaluations for data security systems. NWGLDE disclaimer/mission statement does not support this and is outside the scope of the workgroup. NWGLDE mission concerns are only for the leak detection function.
- Heather will make adjustments to the disclaimer page and remove the revised date.

Links Webpage – David Wilson

- The links page has been updated.

Other Issues not Previously Covered – Any member

- Tim Smith – EPA test protocols are in the process of being reviewed and updated. NVTTC/VTTT protocols have not been reviewed by the EPA review team. Concerns about ethanol and applicability will be addressed. A package will be submitted by the end of April 2017 to be reviewed. By mid-December 2017, the protocols will be available for the evaluators. EPA to have the protocols to the workgroup prior to the Fall 2017 meeting.
- Miscellaneous forms – ATG monitor maintenance checklists need to be reviewed. ATG and leak detector teams to review before the next meeting. A comparison to the new rule will be performed and updates will be made or new forms created. A link needs to be added to this page (O&M and Must for UST Systems: Practical help & checklists). Checklist will be moved for future reference.
- Team assignments will be changed to accommodate new member. Jason Cocke to IM team with Tim and to replace the spots that Helen formally held. Helen will move to administration.
- Mike Juranty to take minutes at the next meeting.
- Shaheer Muhanna had a lengthy discussion about the MDLR and how it applies to determining the threshold for SIR. The threshold must be half or less of the minimum detectable leak rate. Shaheer to send letters to the SIR vendors that do not meet the requirements. There is concern about the sliding threshold. All listings must be addressed. One monthly test result should be considered “Inconclusive” if the MDLR is less than the threshold.

Vendor Presentation

Steve Purpora, Purpora Engineering, Inc. and Acquisitions

- The presentation was about the Petro Tite Line Tester. Steve proposed to make changes to the current listing by lengthening the test period and allowing for multiple lines to be tested simultaneously (up to 3 lines).
- Mr. Howard of Simmons SIR presented a couple questions: On double wall (DW) lines, does testing of the interstice have to be conducted at the 0.1gph threshold? What is the testing interval for the interstice of DW piping?

Discussion of Vendor/Evaluator Presentation

- Steve has proposed to revise his listing for the Petro Tite Line Tester. The Line Leak Detection Team will reevaluate the last revision (4/11/2011). Is the change for rigid pipe only? Will flex pipe be added to the listing? The team lead will contact Steve for clarification.