

NWGLDE Meeting – September 13-14 (Louisville, KY)

Welcome NWGLDE Members and Visitors

Election of New NWGLDE Chair:

Motion was made to elect Don Taylor as the new NWGLDE chair by Heather Peters. Motion was officially seconded. All members were in support of electing Don Taylor, with the Tennessee Department of Environment & Conservation, to be the new Chair of the NWGLDE.

Team Leader Updates:

1. Mike Juranty – ATG and VTTT Methods

ATG Completed Review: None.

ATG Under Review:

- Franklin Fueling request for guidance regarding listing EVO 600/6000. Franklin Fueling submitted additional information on April 12, 2018. NWGLDE replied with clarification and confirmation of Franklin Fueling's understanding of third-party review requirements on July 27, 2018. To date, no third-party evaluation has been submitted.

VTTT Completed Review: None.

VTT Under Review: None.

2. Shaheer Muhanna – CITLDS Methods

Completed Review: None.

Under Review:

- Request made by Franklin Fueling to add Evo 600 and Evo 6000 to SCALD 3 listing. Addendum to September 14, 2015 third – party evaluation was completed by KWA August 28, 2018. Franklin Fueling submitted addendum and recommendations for updated listing on September 4, 2018. NWGLDE members are reviewing the documentation provided.

3. Mike Juranty – NVTTC Methods

Completed Reviews:

- CGRS, Inc. IotaVision Leak Detection Method (Tracer) Test submitted on March 16, 2018 with third party evaluation conducted by KWA August 17, 2017 has been listed.

Under Review:

- ACTv2 Water Sensor for NVTTC (Vacuum) submitted for listing March 28, 2018. Third-party evaluation conducted by KWA March 5, 2018 per Liquid Level Sensors 1996 protocol. NWGLDE replied for more information March 28, 2018, and additional information was received on April 2, 2018. NWGLDE sent a draft listing to ATS Environmental on July 9, 2018. ATS returned the draft listing with comments and suggested edits on September 7, 2018. These suggestions are under review.

4. Don Taylor – Line Leak Detection Methods

Completed Review:

- Petrotite revisions approved and listed by NWGLDE.

Under Review:

- Pneumercator liquid level control systems request for guidance regarding obtaining third-party evaluation for line leak detection method. Request for additional guidance regarding test fixture was requested by NWGLDE. Test fixture design was provided September 11, 2018. Test fixture design is under review by NWGLDE for use with new protocol. To date no third-party evaluation has been submitted.
- NWGLDE members discussed use of test manifold by Estabrooks EZY CHECK Systems. Further clarification is needed from Estabrooks regarding use of test manifold and listing updated accordingly.

5. Shaheer Muhanna – SIR Methods

Completed Review: None.

Under Review:

- Revision to Fairbanks Environmental Ltd. Evaluation submitted to NWGLDE. Revisions to the existing listing are under review.

6. Tim Smith – Interstitial Monitoring and Out-of-Tank Detector Methods

Completed Review: None.

Under Review: -Bill Strohman submitted letter on August 6, 2018 to NWGLDE from KWA. Requested testing results for diesel, Jet-A, and aviation gas be added to existing listing. Results

were from the Evaluation of the PID Analyzers Model 102 Photoionizer Detector for Measuring Hydrocarbon Concentrations, October 10, 2004.

7. Peter Rollo – Aboveground and Bulk Storage Tank Methods

Completed Review: None.

Under Review:

- Request was made by Leak Detection Technologies, LLC regarding Differential Pressure Leak Test – Dpleak Leak Detection and Leak Location Test method to use third-party evaluation for listing method under Aboveground and Bulk Storage Tank Methods. NWGLDE members requested more documentation regarding request. Documentation provided on September 13, 2018 by David Rabb. NWGLDE members are reviewing the documentation provided.

8. Greg Bareta – Secondary and Spill Containment Test Methods

Completed Review: None.

Under Review:

- Dri-sump Containment Tightness test third-party evaluation submitted to NWGLDE. NWGLDE requested additional documentation regarding test method. To date additional documentation has not been provided.
- Hydro-Tite Containment Tightness test method third-party evaluation submitted to NWGLDE. After further review, NWGLDE concluded that further clarification was needed. Request was made to Leak Detection Technologies, LLC regarding the need for further clarification. To date additional clarification has not been provided.
- Fueling and Service Technologies (FASTECH) – Vacu-Tite & Heli-Tite submitted for listing December 12, 2017. No new developments.

9. Don Taylor – Administration

- Vacancy: Work_group will extend period for accepting applications for work_group membership to October 15, 2018.

- In the interim, teams were reassigned as listed in the chart below under Team Assignments.

Team Assignments

Automatic Tank Gauging (ATG) and Volumetric Tank Tightness Test (VTTT)	Peter Rollo	Wesley McCain
Continuous In-Tank Leak Detection Methods	Shaheer Muhanna	Wesley McCain
Non-Volumetric Tank Tightness Test Methods	Wesley McCain	Mike Juranty Greg Bareta
Line Leak Detection Methods	Greg Bareta	David Wilson
Statistical Inventory Reconciliation (SIR)	Shaheer Muhanna	Greg Bareta
Interstitial Monitoring and Out-of-Tank Detector Methods	Tim Smith	Shaheer Muhanna Peter Rollo
Aboveground and Bulk Storage Tank methods	Peter Rollo	Greg Bareta Tim Smith
Secondary and Spill Containment Test Methods	Greg Bareta	Tim Smith Mike Juranty David Wilson
List Administration	Don Taylor	David Wilson

Old Business

1. Protocol / Threshold for Sump / Spill Testing – Tim, Heather

- List of content changes is coming for work group approval. Protocols undergoing final editing process.

2. File Retention Committee, Status of Scanning and Access to Files – Dave, Helen

- Helen completed naming files and is sending to Tim for storage on server.
- Helen also sent list of “Under Review and Not Listed Third-Party Evaluations” updated through September 2018.
 - Don and Pete volunteered to manage the list going forward.
 - Proposed adding a column for due date and drop out date to aide in managing size of list while focusing on active vendors third-party evaluations.

- List to be sent out before future meetings to review and clean up as resolved.

3. PAP Manual Update / Requests to Teams – Tim

- Proposal by Mike Juranty to develop “Sensor Comparison Checklist” similar to “ATG Console Comparison Checklist”.

4. Electronic Annual Listing Creation – Dave, Heather

- To date work_group has only heard positive reviews on the e-publishing of the annual listing updated versus the propagation of a rolling master list. The work_group intends to continue this procedure.

5. Review of Line Leak Detection, AHS and FCT – Don, Tim, Heather

- Recommendation was made by work group members to change the announcement on website under AHS and FCT methods. Recommendation was made to replace “requests” with “recommends” in the last sentence of announcement.
- Decision was made to separate list (into approved / not approved) under new listing format once Hansa gains NWGLDE approval to be listed.
- Don is checking with Vista Precision regarding status of their third-party evaluation.
- Once Hansa and Vista are listed, NWGLDE will try to contact other vendors regarding status and give deadline for third-party evaluations to be submitted. Once deadline has passed all unapproved vendors will rotate to list of un approved and the announcement recommending state acceptance will be removed from the website.

6. Draft Language for SIR Listings (and new regs) – Tim / Shaheer

- Don to email draft statement regarding SIR Qualitative methods. Statement to be posted to NWGLDE website; following 40 CFR 280.43 (h)(1) to require Quantitative SIR methods, which are reported with a -calculated leak rate.
- Regarding listings:
 - It was agreed that max throughput for each vendor listing should be listed. Need to verify and update listings accordingly.
 - Under some SIR Quantitative methods it is stated “A leak should not be declared tight if the test results indicate a loss or gain that equals or exceeds the leak

threshold calculated from the data set.” Need to verify and update listings accordingly if the third-party evaluation does not include this statement.

7. Interstitial Monitoring Protocols Issues – Mike

- Completed discussion.

8. Reviewing Tank Tightness Test Methods for Double-walled systems

- Wesley & Don will contact NVTTC and VTTC vendors to determine applicability to double walled systems and seek clarification on pass / fail criteria for double walled systems.

9. Implementation of New Protocols in Future – Tim, Heather

- No new updates.

10. Public Meeting Presentations – Heather

- Discussed performing in advance to cover what needs to be covered with vendors.

11. Links Webpage – Heather, Dave

- Previously decided in October 11-13, 2017 meeting that links webpage would be deleted. Follow-up needed to ensure finished.

New Business

1. Policy Review (Review Policy #1 and #2) – Heather

Policy #1: completed.

Policy #2:

- NWGLDE members elected to add section h: “In the event of 3 or more vacancies at one time the work group may opt to waive one or more of the above restrictions.”

2. Webpage Maintenance / Program – Dave, Heather

- No new developments.

3. Any Other Listings to Review Associated with New Regulations

- Bulk Storage Tanks, discussion of scaling factor and ways to proceed forward with listing.

4. Any Other Changes to Consider?

- Proposal was made to consider accepting a protocol for evaluation of the accuracy of data reported for remote monitoring systems accessing ATG data. Protocol would likely take into consideration the ATG console comparison and set reporting requirements for remote monitoring systems. All approved remote monitoring systems / software packages whom meet the protocol will likely be listed under a new test method devoted to remote monitoring. The purpose of the protocol and subsequent third-party evaluation would be to ensure that what comes into the ATG is exactly what comes out of the remote monitoring system. Motion was made by Heather Peters to proceed in this direction regarding remote monitoring systems and officially seconded with no opposition from work_group members.
- Tim is sending letter to Tank Tech, Inc. regarding Braddock Method using vacuum on the interstice of an in-situ upgraded tank. Letter will state that NWGLDE approval has been denied until discrepancies resolved with NWGLDE. Heather is checking to see if she hasn't already sent this letter to Tank Tech, Inc.
- Mike sent letter to Steel Tank Institute regarding information for listings. Mike is to send letter to Tim.
- Work_group members decided to change the following regarding 3rd party data.
 - Add term "3rd Party Data" to glossary, as data collected in which the third-party evaluator is the one inducing the leak or no leak condition.
 - Attach the same term for 3rd party data to section (2)(D) of the "NWGLDE Leak Detection equipment / method evaluation review – Document List".

5. Lustline Articles – Tim, Heather

- Next lust line article regarding Statistical Inventory Reconciliation in the process of being written by Tim.
- Work group proposed a future topic regarding Secondary Containment Tightness testing and targeting different leak rates.

6. Travel / Meeting Agenda Issues (how will we do the next meeting) – Heather

- Total of 5 locations were suggested and voted upon by NWGLDE members. Locations sent to NEIWPC for approval and scheduling.
- NEIWPC approved providing government rate for participating vendors for future meetings. Participating vendors will need to be notified prior to the next meeting once location is approved by NEIWPC.

7. Old Evals, Old Protocols, New Listing Reminder – Tim, heather

- Completed third-party evaluations performed following the old protocols will have 12 months to turn them in to NWGLDE. **Any evaluations submitted after that period may or may not be accepted by the work group.**
- Vendors need to be aware that use of an old protocol may not address certain issues such as verification of performance with ethanol-blended fuels. Therefore, subsequent listing by NWGLDE may have limitations.
- Deadline will be set once new protocols are released.

Other Issues Not Previously Covered

1. Regarding Leak Detection Technologies Pipeline Hydrostatic Diagnostic Test Method (PHD), the max pipeline capacity of 1,127,000 shown on the listing needs to be verified from the third-party evaluation.
2. Dover Fueling Solutions to submit console comparison for Caldwell ATG Tank Manager Monitoring Systems. Console was changed by Caldwell before Simmons acquisition. Simmons was acquired by Dover Fueling Solutions.

Appointment of Member to Take Minutes at Next Meeting

Motion made for Peter Rollo to take minutes at upcoming meeting. (However, should Peter be unable or unwilling, Shaheer did raise his hand.) Motion seconded by Greg Bareta with no opposition from other members.