## **Pressurized Piping Interstitial Monitoring**

Is There a Better Way?

#### National Tanks Conference September 24, 2025 Spokane, Washington

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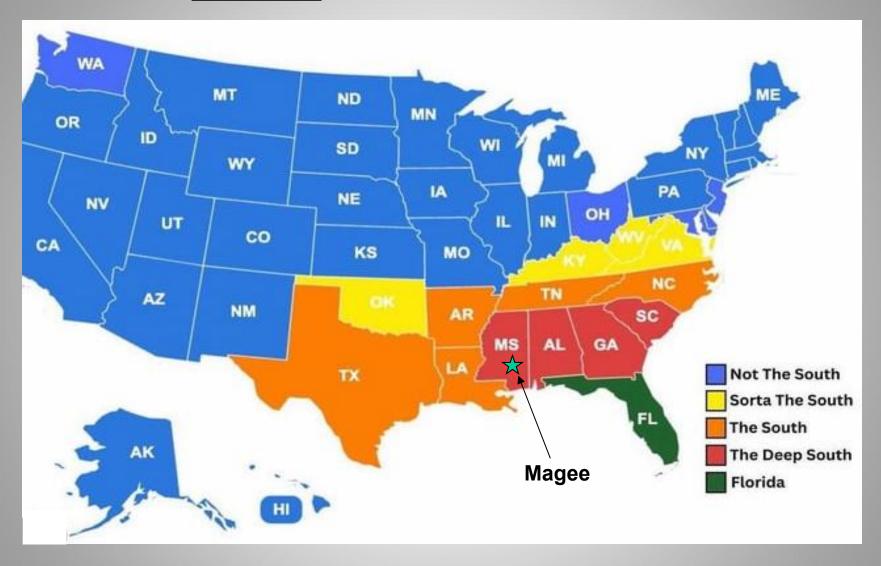


# PRESSURIZED PIPING INTERSTITIAL MONITORING

Historically a lot of confusion and inconsistencies

- 1. What sumps must be monitored/tested?
- 2. How do you ensure piping interstitial communication?
- 3. Where should the interstice be open/closed?
- 4. How do you like your sumps tested?
- 5. What records should be kept?

## **DEEP** South Dialect



I ain't got no English

#### "I'm fixin' to eat dinner"





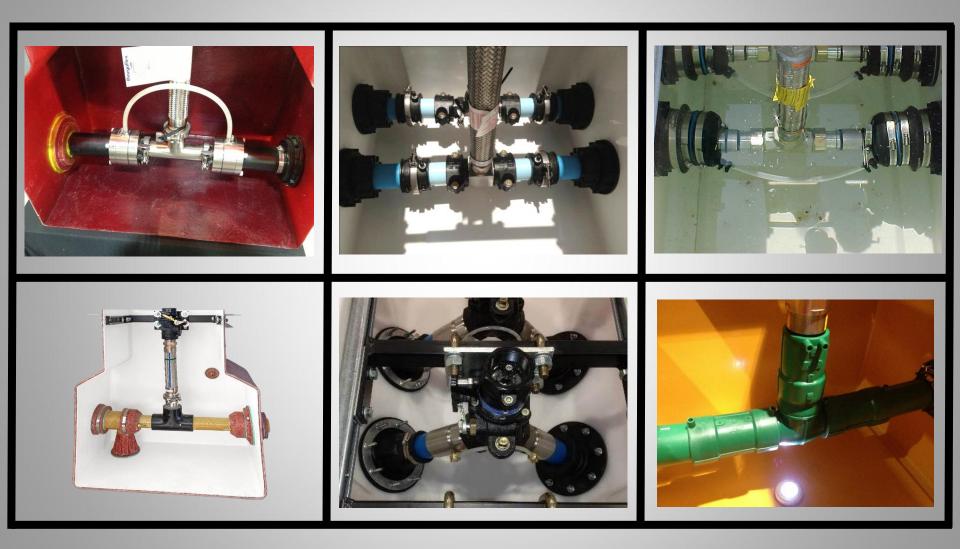
b. 5:00 p.m. – 7:00 p.m.





#### 1. What Sumps Must be Monitored/Tested?

Are there any piping system that are entirely double-walled?



Every piping system I am aware of has single-walled components

# ALL PIPING SYSTEMS HAVE SINGLE-WALL COMPONENTS THIS MEANS

ALL containment sumps must be monitored

ALL single-wall containment sumps must be periodically tested (3-year integrity testing)

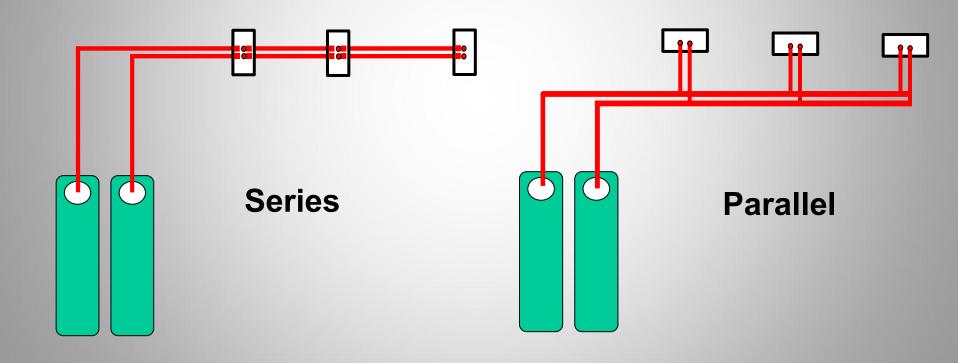




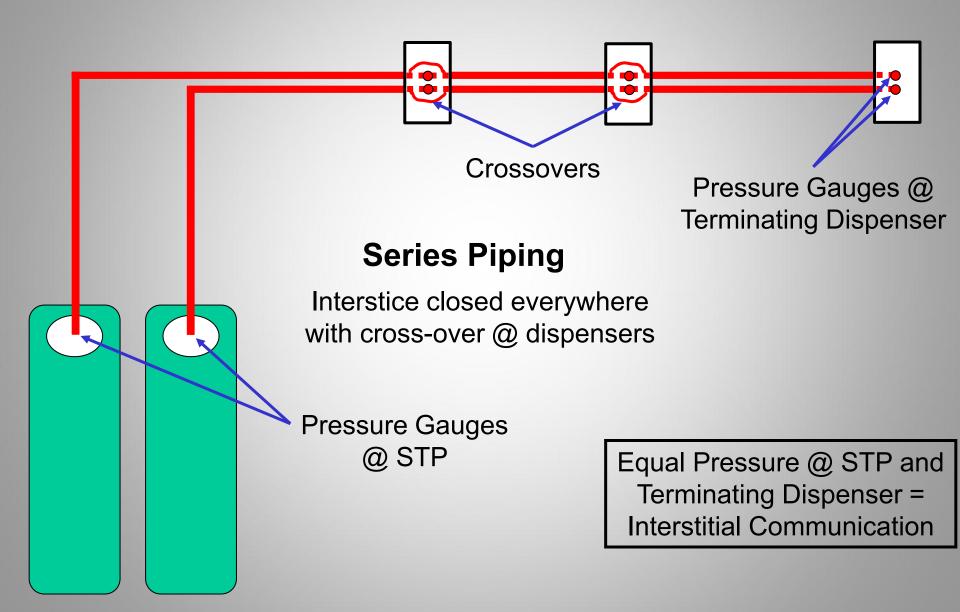
Monitoring & periodic integrity testing of containment sumps is independent of whether the interstice is open or closed

#### 2. How do you ensure piping interstitial communication?

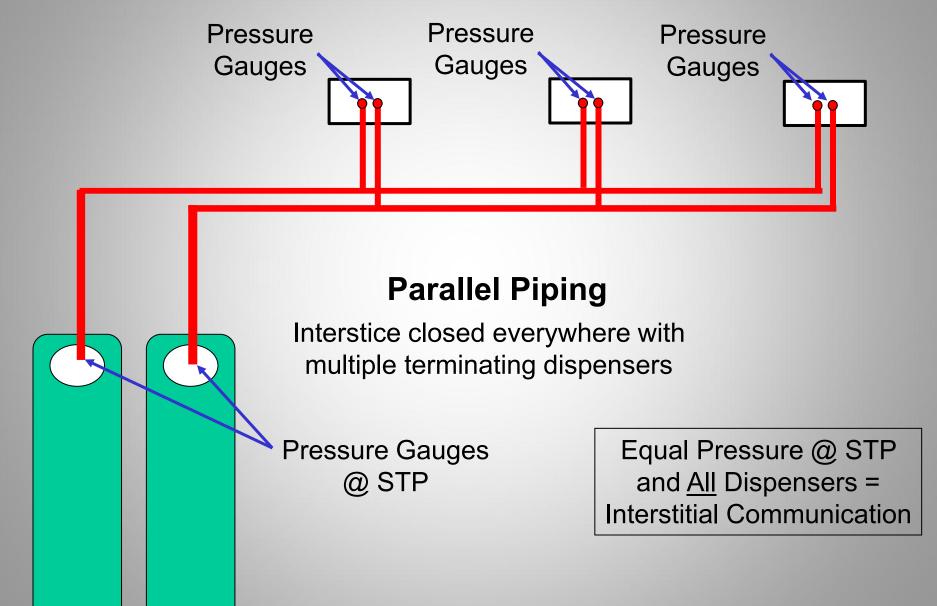
Two basic ways of installing piping systems



# INITIAL PIPE SECONDARY CONTAINMENT INTEGRITY TEST (Performed at Installation of New Piping)



# INITIAL PIPE SECONDARY CONTAINMENT INTEGRITY TEST (Performed at Installation of New Piping)



### **Drink Order – "Half & Half"**





a.



½ milk & ½ cream

b.



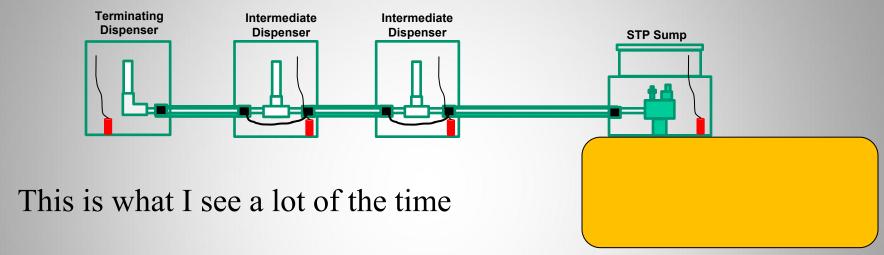
1/2 sweet tea & 1/2 lemonade

C.



½ sweet tea & ½ unsweet tea

#### Closed Everywhere

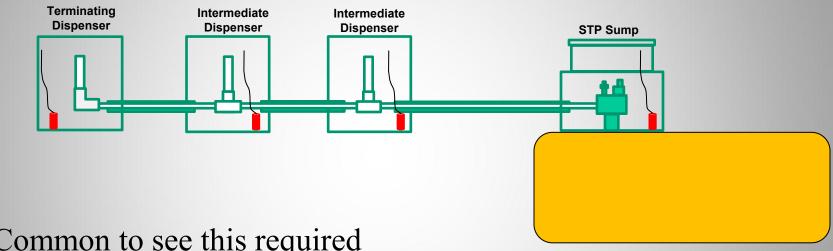


#### Why is it closed everywhere?

- Never opened after initial post installation testing
- Not opened after 3-year integrity testing
- Because don't know any better
- Because thought that was what the regulator wanted

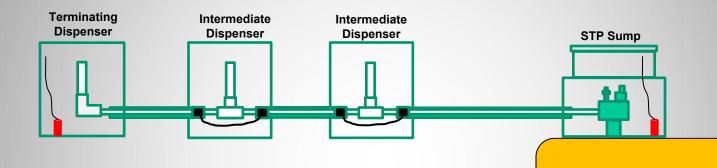
Not cool unless doing Vacuum or Hydrostatic Monitoring

#### Open everywhere



- Common to see this required
- This came about before the periodic sump integrity testing requirement was implemented
- This can be problematic now that the sumps have to be tested every 3 years

Open at the STP and terminating dispenser

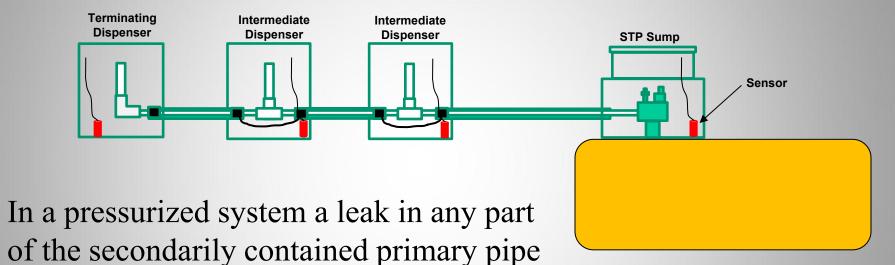


- Sensors usually only at the STP and terminating dispenser
- This was common back in the day before it was understood all sumps must be monitored



Cross-overs @ Intermediate dispensers

Open at the STP only



Transit time is relatively short (STPs typically operate at 28-32 psi)

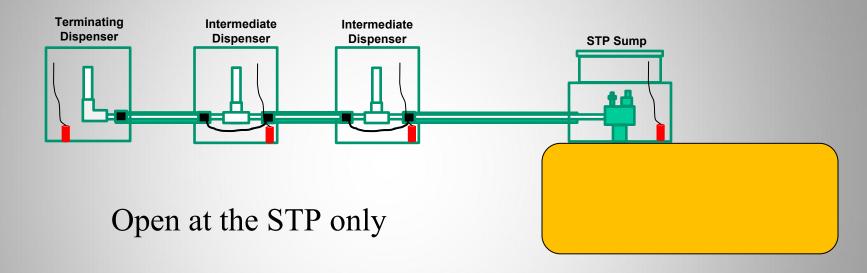
will travel to the open sump

 Many people still think of transmission of leak as being dependent on gravity



Slope back to the STP no longer required

So what is the suggested best recommended practice?



Suggested Best Recommended Practice also has to do with how do you like your sumps tested?

#### **APPERTIZER**









a. Bruschetta

b. Charcuterie Board

c. Fried Dill Pickles

#### 4. How Do You Like Your Sumps Tested?

Hydrostatic – Low Level



Penetration fittings (where the leaks are) probably not even wetted

Very little (if any) hydrostatic head pressure put on potential leak points



Pipe interstice can be left open in most cases

"Stand alone" dispenser sensors accomplish little or nothing relative to stopping leak in a timely manner

#### 4. How Do You Like Your Sumps Tested?

#### **Dri-Sump Testing**



All penetration fittings, joints, seams tested

Zero hydrostatic head pressure on potential leak points

Pipe interstice can be left open



Method depends on putting negative pressure on entire sump assembly from outside (through the backfill)

Are you testing all sump fittings?

#### 4. How Do You Like Your Sumps Tested?

Hydrostatic – High Level



All penetration fittings, joints, seams tested

Hydrostatic head pressure on potential leak points

Pipe interstice must be closed everywhere

Creates too much waste water argument doesn't really wash

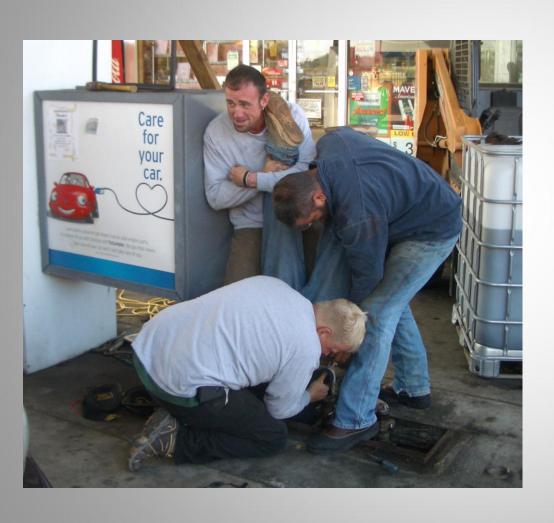
#### Whatever You Decide

Please do not require the interstitial communication port to be pointed down – Gravity has little to do with it



#### **How Do You Want Your Sumps Tested?**

Hydrostatic – High Level



- Access to the interstitial monitoring port can be very difficult
- How likely is it this kind of effort will happen if the interstice has to be closed for testing?
- Or are they more likely to just fake it?

# INTERSTITIAL PORT ORIENTATION Is it open or not?

Everyone is much better off like this

Or even this





## INTERSTITIAL PORT OPEN OR CLOSED



How do you want it today?

#### **Main Course**





**Fried Catfish** 

#### **Sides**



a. Cole Slaw



b. Turnip Greens



c. French Fries



d. Hush Puppies

#### 5. What Records Should Be Kept?

#### a. Liquid Status

LIQUID STATUS

APR 8, 2022 1:25 PM

L 1:REG UNL SUMP SENSOR NORMAL

L 2:PREM UNL SUMP SENSOR NORMAL

L 3:DIESEL SUMP SENSOR NORMAL

L 4:REG UNL INTERSTICE FUEL ALARM

L 5:PRE-DIES INTERSTICE SENSOR NORMAL

L 6:DISPENSER 1-2 SENSOR NORMAL

#### b. Sensor Alarm History

ALARM HISTORY REPORT

---- SENSOR ALARM -----L 1:REG UNL SUMP STP SUMP FUEL ALARM JUL 27, 2021 1:55 PM

FUEL ALARM MAY 18, 2021 9:02 PM

FUEL ALARM AUG 3, 2020 12:19 PM

L 2:PREM UNL SUMP STP SUMP FUEL ALARM JUL 27, 2021 1:57 PM

FUEL ALARM AUG 3, 2020 12:24 PM

FUEL ALARM FEB 12, 2020 11:26 PM

## c. Alarm Reconciliation Log



#### 5. What Records Should Be Kept?

#### Alarm Reconciliation Log

ALARI For use of th	M/INTRUSIO is form, see AR 19	N DETEC	INSTALLATION/ACTIVITY				
'HIS FORM WILL BE USED IN	ALL POSTS, C	AMPS, ANI	D STATIONS V	VHERE INTR	USION DETEC	CTION DEVICES ARE USED	
LOCATION OF ALARM (a)	KIND OF ALARM¹ (b)	DATE (c)	TIME REPORTED (d)	TIME CLEARED (e)	WEATHER CONDITIONS (f)	ACTION TAKEN (g)	EXPLANATION OF NUISANCE/FALSE ALARM (h)
				7			
		1					T.
						-	
							- 2

#### 5. What Records Should Be Kept?

#### Alarm Reconciliation Log

#### MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY MONTHLY ELECTRONIC INTERSTITIAL MONITORING

- > This form may be utilized to document electronic interstitial monitoring of secondarily contained UST systems.
- Interstitial monitoring is required on all secondarily contained UST systems installed after October 1, 2008.
- You must maintain a monthly written record that electronic interstitial monitoring has been accomplished.

UST	Facility			Person Conducting Monitoring				
Facility Name MDE			ity ID#	Person's Name				
12977			77	Kevin Henderson				
Physical Address				Company				
				Kevin Henderson Consulting, LLC				
City	County		State	City	State			
Flowood Rai		nkin	MS	Magee	MS			
UST Owner				Person's Signature	Date 08/18/2025			
Electronic Interstitial Monitoring								

UST System Components Electronically Monitored (check all that apply)

✓ Double-walled Tank ✓ Double-walled Pipe ✓ STP Sump ☐ Dispenser Sump

Interstitial Space (check all that apply)

☑ Atmospheric (drv) ☑ Hvdrostatically Monitored (Brine Filled) ☐ Vacuum Monitored ☐ Pressure Monitored

Type of Electronic Device (check all that apply) ☐ Float Switch ☑ Optical

□ Electrical Resistivity □ Other (specify)

#### MDEQ Electronic Interstitial Monitoring Procedure

- 1. Document that all sensors are connected to console and apparently functional in the appropriate space below. If your system is capable of producing a "sensor status" report you must attach a copy of the report or it's equivalent to this form.
- Document all alarms that may have occurred during the month by completion of this form. If your system is capable of producing an "alarm history" report you must attach a copy of the report or it's equivalent to this form for the month.
- 3. Investigate and document the cause of the alarm including a measurement of the amount of water and/or fuel observed in inches if applicable. Take the appropriate action to resolve the alarm. Consult with your certified contractor if necessary. Attach a copy of all appropriate documentation to this report to show adequate reconciliation of all alarms for the month

Any unusual operating conditions or suspected releases discovered must be reported to MDEQ within 24 hours of discovery.

Monitoring Results for the Month of					Augus	st	Ye	Year		
Electronic Sensor ID (Location)	1	2	3							
Component Monitored: Tank / Pipe / Sump	Fill Sump	STP Sump	Tank Inter.							
Sensors are connected to control panel and working?	Yes	Yes	Yes	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
Have there been any alarms for this month? If	Yes	Yes	Yes	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N

	Sensor ID	Date of Alarm	Cause of Alarm	Date Resolved	Describe action taken to resolve
A	Level	08-18-2025	Fuel Sampling	08-18-2025	Probe reinstalled in tank after sampling completed
L A	1	08-05-2025	Annual Testing	08-05-2025	Sensor reinstalled in fill sump
R	2	08-05-2025	Annual Testing	08-05-2025	Sensor reinstalled in STP sump
	3	08-05-2025	Annual Testing	08-05-2025	Sensor reinstalled in interstitial riser
O G	Level	08-05-2025	Annual Testing	08-05-2025	Probe reinstalled in tank

-SITE INFORMATION: Name: BCBS JACKSON MS ID#: EL111781 VER 9.08 PR 080812 AUG 18, 2025 11:45 AM

#### INVENTORY REPORT

TANK 1: DIESEL PRODUCT HEIGHT 96.59 (In) WATER HEIGHT : 0.00 (In) GROSS VOLUME 21743.87 (G) T.C. VILLING 21547.95 (G) 0.01 (G) 3225.13 (G) 90% ULLAGE 728.23 (G)

80.21 (F)

--- OMNTEC SENSOR MO 08/18/25 11:46:21

TEMP.

S#: 1, P/N: BXLS , S/N: 000110486 Tank#: ?,Label#: 0. NORMAL !

--- OMNTEC Mfg., Inc. Tel: 1(631)981-2001 Fax: 1(631)981-2007

----OMNTEC SENSOR MO 08/18/25 11:46:23 S#: 2, P/N: BXLS , S/N: 000110489 Tank#: ?,Labe!#: 0. NORMAL I

--- OMNTEC Mfg., Inc. Tel: 1(631)981-2001

Fax: 1(631)981-2007

NORMAL!

---- OMNTEC SENSOR MO 08/18/25 11:46:25 S#: 3, P/N: BXRES , S/N: 300092633 Tank#: ?,Labe!#: 0.

BCBS OF MISSISSIPPI ELECTRONIC INTERSTITIAL MONITORING

August 2025

Name: BCBS JACKSON MS 1D#: EL111781 VER 9.08 PR 080812 AUG 18, 2025 12:26 PM

--- SITE INFORMATION:

#### ALARM LOG REPORT

Tank Number 1 DIESEL LOW LEVEL ALARM CLEARED Event Time: MO 08/18/25 12:04:23

Tank Number 1 TIME OUT ALARM CLEARED Event Time: MO 08/18/25 12:04:13

Tank Number 1 DIESEL LEVEL PROBE TIME OUT Event Time: MO 08/18/25 11:57:27

Tank Number 1 DIESEL LOW/LOW LEVEL ALARM Event Time: MO 08/18/25 11:56:51 2501.34 (G)

Tank Number 1 DIESEL LOW LEVEL ALARM CLEARED Event Time: TU 08/05/25 15:07:06

Tank Number 1 TIME OUT ALARM CLEARED Event Time: TU 08/05/25 15:06:52

S#: 1. BXLS . S/N: 000110486 Tank#: ?,Label#: 0 SENSOR ALARM CLEARED Event Time: TU 08/05/25 12:14:42

S#: 1. BXLS , S/N: 000110486 Tank#: ?.Label#: 0 LIQUID ALARM! Event Time: TU 08/05/25 12:13:34

S#: 3. BXRES . S/N: 300092633 Tank#: ?.Label#: 0 SENSOR ALARM CLEARED Event Time: TU 08/05/25 12:10:06 S#: 3. BXRES . N. 300092633 Tank#: ?,Label#: 0 HIGH LIQUID ALARM! Event Time: TU U6/U5/25 12:09:39

S#: 3. BXRES . S/N: 300092633 Tank#: ?.Label#: 0 LOW LIQUID ALARM! Event Time: TU 08/05/25 12:09:36

S#: 2, BXLS , S/N: 000110489 Tank#: ?.Label#: 0 SENSOR ALARM CLEARED Event Time: TU 08/05/25 11:35:43

S#: 2, BXLS , S/N: 000110489 Tank#: ?, Label#: 0 LIQUID ALARM! Event Time: TU 08/05/25 11:35:12

Tank Number 1 LEVEL PROBE TIME OUT ivent Time: 10 107/05/25 11:29:07

### **Interstitial Monitoring**

a. Leak Detection

OR

**b.** Release Detection



#### Dessert







a. Crème Brulee



c. Tiramisu



b. Peach Cobbler