

NWGLDE Spring Meeting May 6-8, 2026 (Milwaukee, WI)

Team Leader Updates:

1. Wesley McCain – ATG, VTT, and NVTT Methods

- Completed NVTT Methods Reviews in January 2026
 - ✓ Listed Petro Specialties PetroVac – Continuous Interstitial Tank Monitoring Method (Pressure/Vacuum): Positive Displacement Vacuum Pump as a Vacuum Source for Veeder-Root’s Secondary Containment Leak Detection (SCLD).
 - ✓ Listed Petro Specialties PetroVac – Continuous Interstitial Line Monitoring Method (Pressure/Vacuum): Positive Displacement Vacuum Pump as a Vacuum Source for Veeder-Root’s Secondary Containment Leak Detection (SCLD).
 - ✓ Updated Veeder-Root’s Secondary Containment Leak Detection (SCLD) listing to add this comment: “A difference in elevation of 8 foot or greater between the float valve and the low point (s) of the interstitial space may prevent the float valve from activating if the pressure from the column of liquid from intrusion is able to exceed or offset the vacuum established by the vacuum pump. (Example: An 8-foot column of water is the approximate equivalent of 3.5 psi (7 in HG) and may mask intrusion if liquid sensor is not located at the lowest point of an interstitial space.)”
- Under Review – Pending listing
 - ✓ Petro Specialties PetroVac – Continuous Interstitial Tank Monitoring Method (Pressure/Vacuum): Positive Displacement Vacuum Pump as a Vacuum Source for Franklin Fueling Systems’ Secondary Containment Monitoring (SCM).
 - ✓ Petro Specialties PetroVac – Continuous Interstitial Line Monitoring Method (Pressure/Vacuum): Positive Displacement Vacuum Pump as a Vacuum Source for Franklin Fueling Systems’ Secondary Containment Monitoring (SCM).
 - ✓ Updating Franklin Fueling Systems’ Secondary Containment Monitoring (SCM) listing to add this comment: “A difference in elevation of 8 foot or greater between the float valve and the low point (s) of the interstitial space may prevent the float valve from activating if the pressure from the column of liquid from intrusion is able to exceed or offset the vacuum established by the vacuum pump. (Example: An 8-foot column of water is the approximate equivalent of 3.5 psi (7 in HG) and may mask intrusion if liquid sensor is not located at the lowest point of an interstitial space.)”
- NVTT Methods Team will send courtesy announcements to other Continuous Interstitial Tank & Line Monitoring Method vendors to inform them NWGLDE will update their listings to add same comment as that added to VR and FFS listings.
- Completed ATG Methods Reviews:

- ✓ Listed Veeder-Root's Model 8508 Series Wireless System with Magnetostrictive Probe with 8600 Series, TLS-450 & 8601 Series/TLS4 Series consoles.
 - ✓ Updated Training and Services Corp.'s AcuRite Line Tightness Test Method listing. Removed six hours Wait Time from original evaluation that achieved temperature change by simply waiting. Re-evaluation mechanically changed temperature resulting in Wait Time change to 30-minutes.
2. **Shaheer Muhanna** – CTLDS/SIR Methods
 - No activities during this period.
 3. **Mike Hollis/Dustin Turner** – Line Leak Detection Methods
 - Completed Review:
 - ✓ Updated Purpora Engineering, Inc. – Petro Tite Line Tester listing. Clarified/updated the number of required test readings acceptable to pass a line is three, not two to be consistent with vendor's manual and other training material. There was a table included in the original version of NWGLDE's listing that caused some testers to think that only 2 readings were acceptable to pass a line. However, company manual and training materials all say a minimum of 3 readings are required to establish a trend.
 4. **Tim Smith** – Interstitial Monitoring and Out of Tank Detection Methods
 - ✓ No activities during this period.
 5. **Oma Gilbreth** – Above ground and Bulk Storage Tank Methods
 - No activities during this period.
 - Brought to the attention of the group about what appears to be an increasing trend. Within last 9 months or so, there have been 5 or 6 UST system owners/operators wanting to reuse previously installed ASTs. A refinery may be donating these tanks. Wyoming, like most states hold firm to requiring original tank manufacturers having to recertify for installation.
 6. **Mike Hollis** – Secondary and Spill Containment Test Methods
 - No activities during this period.
 - See Old Business below where group discussed plans forward to address two outstanding issues/requests pertaining to the Dri Sump method.

Administrative:

Don Taylor – Discussed Website, updating listings, and his state's SharePoint site being continuously relocated which is prompting the group to use some other means to maintain archived files, etc.

Old Business:

- Group discussed and decided how to address four recent inquiries/soft requests for revisions or new listings pertaining to the Dri Sump method, as indicated below. NWGLDE recognizes that the scope of its posted listing is strictly regarding ability of equipment or methods for leak detection purposes. However, the group is aware that some UST implementing agencies are under the misperception that listing by NWGLDE constitutes all concerns such as fire, life safety, and potential environmental limitations or concerns have been addressed, and that equipment and methods are therefore completely acceptable in every jurisdiction. To ensure UST implementing agencies and method users of atypical technologies are made aware of such concerns beyond leak detection-related issues, except for the proposed pre-burial test procedure, NWGLDE will review potential third-party evaluations for listing consideration of modifications to the Dri Sump method, as noted below.



1. Pre-burial Test Procedure

- **NWGLDE will not be able to list this type of procedure. It is an installation procedure and not within the scope of NWGLDE's Mission.**
- It would involve the reverse of the current listed procedure. VSTs would instead be placed with the sump or other secondary containment areas. Fog/test substrate would be added to the backfill surrounding the tank or line to be tested.

2. Post Burial Test Procedure

- It would involve installation of VST tubes through the walls of previously installed sumps or other secondary containment areas into spaces surrounding the tank or lines.
- Stated benefits: Avoids drilling through concrete.
- **NWGLDE position:** If listed by NWGLDE, the listing would include statements about the following concerns:
 - ✓ The UST implementing agency should be contacted to ensure compliance with the following:
 - ✓ Manufacturers of the sump or other secondary containment unit need to be contacted about allowable penetrations to be made.
 - ✓ NLPA – should be reviewed to ensure repairs post installation of VSTs are allowed by standard.
 - ✓ Does installation of the VSTs prohibit use of PEI RP1200 procedures in the future?
 - ✓ Do the VSTs and other components involved in the test preparation and procedure meet compatibility requirements?
 - ✓ If PEI RP100 installation standard is used, can hydrostatic testing be performed as required?

- ✓ Is a licensed or certified installer required to install the VSTs through the previously installed sump or secondary containment area?

3. Chase Pipe Test Procedure

- It would involve/target chase pipe to provide indication whether product had escaped double-walled piping run through the chase pipe.
- **NWGLDE position:** If listed by NWGLDE, the listing would include statements about the following concerns:
 - ✓ Chase piping (except first generation TCI piping) is not listed as meeting regulatory secondary containment requirements.
 - ✓ Corrugated and other types of chase piping are not designed or installed to be liquid tight.
 - ✓ Any amount of liquid in spacing will prohibit the fog/test substrate from mobilizing.

4. Pressure-based Dri Sump Testing (is not covered by current NWGLDE listing)

- **NWGLDE position:** NWGLDE will make it clearer that current listing is for vacuum based testing only with spill bucket / sump fogger and vac applied externally to that sump / spill bucket. The method was not evaluated for pressure-based methods.

New Business (Topics discussed at various times during three-day meeting period):

1. Team Assignments: Group postponed assignments until new members are selected.
2. Group later in meeting discussed candidates and most members were able to submit votes as required by policy. Group anticipates selecting 2 new members and formally informing them over next two weeks.
3. Next meeting is planned for Lowell, Massachusetts – Fall 2026. Details to be announced.

Open Meeting (No vendor presentations this period)

- **Don Taylor** presented and discussed three topics during the open portion of the meeting. The first was new and revised definitions, as noted below. These definitions are based on ASTM fuel standards, EPA characterizations, and information currently available by the fuel industry. Due to recent Congressional and state actions to allow even greater levels of ethanol (i.e., up to E15) in gasoline and consistently changing fuel formulations in general, NWGLDE plans to incorporate these definitions of specific fuels into its Glossary and listings, as applicable. This should more clearly identify what specific fuels were tested and are applicable for use with listed equipment and methods.

1. **Proposed New and Revised NWGLDE Definitions** (Red strikethrough font shows deletion; yellow highlight shows addition)

(Revised) Alternative Fuel: A fuel or petroleum fuel blend containing any amount of non-petroleum component, including but not limited to ethanol, methanol, or animal/vegetable oil. ~~with the exception of petrodiesel blends containing more than 5% biodiesel.~~

(New) Non-Oxygenated Gasoline (Non-Ethanol): A motor fuel that may contain ethanol up to 4.3 percent by volume.

(Existing) Diesel or Diesel Fuel: Hydrocarbon oil that may contain up to 5 percent biodiesel in accordance with the current edition of ASTM standard D975.

(Revised) Gasohol (E10): A blend of finished motor gasoline containing alcohol (generally ethanol but sometimes methanol) at a concentration between ~~5.7~~ 4.3 percent and nominal 10 percent by volume. ~~also referred to as “E10” when the ethanol component is a nominal 10 percent of the blend.~~

(New) Ethanol blended Gasoline: A blend of finished motor gasoline containing greater than 10 percent ethanol by volume.

(New) Bio-blended Diesel: Hydrocarbon oil that may contain greater than 5 percent biodiesel in accordance with the current edition of ASTM standard D975.

2. **Discussed and Refined Proposed Statement about Vacuum-based Tightness Test Methods**

Don Taylor discussed the second (i.e., water sensor capabilities) and third (i.e., pressure/vacuum restrictions) issues together. He provided background information about NWGLDE’s broad concern about so many previous evaluations reviewed by the group having been on vastly different UST systems than those that are in operation today and are currently being installed. In particular, he noted concerns with the functionality of leak detection equipment and test methods with new fuels such as biodiesel and increases of alcohol (i.e., ethanol) content being added to what was referred to conventional gasoline. The major concern being the capability of water sensors to discern water in “newer” fuels.

Don discussed Battelle’s 2014 study prepared for the EPA – Suitability of Leak Detection Technology for Use in Ethanol-Blended Fuel Service, EPA/600/R-15/254, September 2015. The study highlights concern with all leak detection methods relying on a determination of the presence of water by using legacy water sensing means. The Battelle study aided in Battelle revising EPA’s 2019 leak detection test protocols. One key change is the addition of a procedure to test sensors with various fuel-water-ethanol blends to determine functionality of sensors in ethanol-blended fuels with potential interference by the presence of varying levels of water.

Don also talked about trying to address concerns the group has with not enough vacuum being pulled in some test situations, compounded by a restriction on pressure/vacuum conveyed by an email from Xerxes Corporation. The group had previous discussions with vacuum-based method vendors during the open sessions of NWGLDE's last two in-person meetings. Some vendors responded to a survey of questions seeking specific information on their test methods. The survey was sent out around 6/18/25. Neither Xerxes or other tank manufacturers have issued any written positions regarding pressure/vacuum limitations. Vacuum-based method testers are in limbo and NWGLDE is also questioning how to proceed.

Don talked through this statement that NWGLDE is proposing to post on its website:

Statement for Non-Volumetric TTT Summary Page

Some tank manufacturers may no longer approve the practice of Non-Volumetric vacuum testing at excessive vacuum level which may exceed safe testing conditions due to deflection of excessive vacuum at the tank bottom. Consult the tank manufacturer to determine the appropriate vacuum concentrations.

NWGLDE is currently working directly with tank manufacturers to address how to move forward.

Feedback and discussions from attendees included:

- NWGLDE noted group would like to close out this issue by the time of its Fall 2026 meeting.
- Several attendees stated that the proposed statement seems to be unfairly punitive to NVTT testers.
- NWGLDE noted that the water sensor issue affects other listed leak detection methods, but NVTT was just where the group started to address this broad concern.
- NWGLDE noted strikethrough text would not be included. It is more of a potential solution but hope with feedback to perhaps provide other indications of solutions/workarounds.
- At least two major NVTT companies mentioned that based on previous discussions with the major tank manufacturers, historically, 5 psi was the pressure limit each was comfortable with being applied for post-installation testing purposes.
- One major NVTT company indicated that his company as of 2015 had tested over 1 million tanks/UST systems using this "limit," and since 2015 to present, have probably tested at least a million more tanks/UST systems with this same "limit" in mind.
- Question whether vendors are still using same water sensing equipment they were originally evaluated? Existing listing may need to be updated to reflect current practices, etc.
- Have vendors switched to using observation wells; magnetostrictive probes; stick with water finding paste (which paste works?); other

- Suggestion to contact PEI to coordinate concerns or reflect in RP 100, RP 1200, etc.
- Suggestion to reach out to several UST system owners/operators for feedback. If current methods can't or should not be used because of pressure/vacuum concerns, this will affect testing costs. Perhaps they can speak with tank manufacturers for clarification.
- One attendee noted an inspection resulting in a suspected release investigation that dragged on for years involving 4 passing tightness tests. However, when tank was finally closed after not being able to find reason for loss of inventory/product, investigation found a 2-inch hole in tank. Raises question whether 95-5 probabilities are acceptable for tightness testing.
- Several attendees noted that more recently tightness testing is being used on new release investigation, unlike investigation in past mostly involving dated releases.
- NWGLDE will resend the survey and compile the limited responses it has received.
- An attendee suggested NWGLDE review DOE's 2016 ethanol handbook for additional background about use of ethanol in gasoline.
- An attendee noted that UL does not have a test specifically for E15. UL87 addresses up to 10 percent ethanol, while UL87A addresses E25, E40, and E85. There is a question whether or when compatibility, etc., verifications can be made.

Spring 2026 NWGLDE Meeting

Name	Company	Email	Signature
Tim Smith	US EPA - OUGT	SMITH.TIM@EPA.GOV	Tim Smith
Dave Wilson	Utah DEQ	djwilso@utah.gov	Dave Wilson
Mike Holus	NJDEP	Michael.Holus@DEP.NJ.gov	Michael Holus
Shahar Muhammad	EPD, GA	shahar.muhammad@dep.ga.gov	Shahar Muhammad
Mark Olsen	ID NWGLDE	Mark.Olsen@Dep.IDM.Gov	Mark Olsen
Dustin Turner	TN-DEC	dustin.turner@tn.gov	Dustin Turner
Howard Dockery	TX ECCX	Howard.L.Dockery@TXECCX.COM	Howard Dockery
Dawn Brooks	Purpora Engineering	dawnb@purporengineering.com	Dawn Brooks
Ed Kubinsky	OWL Services	ed.kubinsky@owlservices.com	Ed Kubinsky
Sam Gordji	S.S.G. ASSOCIATES	samgordji@degrees.com	Sam Gordji
Todd Ferguson	Tanknology	tferguson@tanknology.com	Todd Ferguson
Chandler Fenton	HCNA	cfenton@hcnall.com	Chandler Fenton
Dave Emmerson	VEEDER-ROOT	dennmerson@VEEDER.COM	Dave Emmerson
Craig Wilcox	Ken Wilcox Associates	c.wilcox@KWILCOX.COM	Craig Wilcox
Jackson Seymore	JF Petroleum - LDT	jackson.seymore@JFpetroleum.com	Jackson Seymore
GREG MCGEE	PMP CORPORATION	gmcgee@corp.com	Greg McGee
Greg Bareton	WDATCP	gbareton@wdatcp.com	Greg Bareton