

NATIONAL WORK GROUP ON LEAK DETECTION EVALUATIONS
SUMMARY MINUTES – FALL 1999 MEETING
SAN FRANCISCO, CA 9/14-16/99

SESSION 1 - SEPTEMBER 14, 1999 - Morning and Afternoon

All Work Group members present.

The 6th edition of the list is available electronically at <http://www.epa.gov/OUST/pubs/index.htm>. For help with access, contact Hal White at white.hal@epa.gov or at (703) 603-7177.

Page consolidations for sensors have been successful; the effort will continue for like leak rates with ATG, rigid, and flex pipeline data to be combined in the future.

New protocols approved since last meeting. Copies of these protocols may be obtained from David Wiley at wiley.david@epa.gov.

- Bulk tank mass-based
- ATG probe (the first submittal under this protocol is being reviewed)
- Continuous In Tank Leak Detection System (CITLDS) updated because of inconsistencies in the initial evaluations conducted under the protocol. The final version clarifies and gathers more documentation on testing data and results.

Work will continue to make comments on bulk tank and large pipeline system description more consistent.

New glossary terms relative to SIR.

Stand-alone SIR System -- No human interface, data gathered and analyzed automatically without owner/operator input.

In-house SIR System -- Data gathered and entered by owner/operator. System does analysis. If analysis presents problems, technical support and analysis are available.

Following policy statement for continuous monitoring systems adopted:

A vendor desiring listing for a multiplex system as a continuous or automated leak detection system should submit an evaluation package for the system evaluated using the Continuous In Tank Leak Detection System (CITLDS) or equivalent protocol. If modifications to the CITLDS or equivalent protocol are used, work group approval of the protocol must be obtained before the 3rd party testing occurs. Data used within this type of system must be automatically gathered and transmitted for analysis/monitoring.

Work group policy memos were reviewed and updated. Copies of these memos are available electronically from Curt Johnson at cdj@adem.state.al.us.

SESSION 2 - September 15, 1999 - Morning

All work group members present.

Other attendees:

Alert Technologies	John Crump	tanklink@ameritech.net
Caldon, Inc.	Herb Estrada	herbestrad@caldon.net
	Tony Mediate	mediate@caldon.net
Ken Wilcox Assoc.	Ken Wilcox	kwilcox@kwaleak.com
	Jeff Wilcox	jwilcox@kwaleak.com
Purpora Engineering	Bill Purpora	
Simmons	Jennifer Street	jennifer.street@simmons-corp.com
USTMan	Clifton Miller	
Veeder-Root	Bob Hart	rhart@veeder.com

Visitors:

David Holtry

California SWRCB

Teresa Trinh

California SWRCB

PRESENTATION 1 - Bill Purpora (Purpora Engineering)

Presentation focused on the need for a protocol for testing intermediate sized pipelines and the need to have certification for individuals who conduct testing. In intermediate to large pipelines, factors that do not have to be treated in small pipelines come into play, for example: temperature changes, pipe deflection, and trapped vapor. Therefore, testing protocol is needed to accommodate these variables. Additionally, testers should be certified and recertified on a periodic basis. Presentation met with general agreement.

PRESENTATION 2 - John Crump (Alert Technologies)

Presenter proposed a report card on the protocols for compliance to look at the robustness of existing protocols and products certified under them. Suggested an independent study to gather data on leak detection method performance. Discussion which followed raised following issues:

- Who will fund?
- Is this data already available within the industry? Who would report it?
- Current standards reflect technology available at time of drafting. Is it time to raise the bar for performance standards?
- If study revealed a problem, could EPA respond?

There was general agreement such a study would be beneficial, but little agreement on where the initiative or funding or participation would come from.

PRESENTATION 3 - Ken Wilcox (KWA)

Presenter made the statement that protocol proliferation should be discouraged. Attendees were in general agreement but pointed out that new protocols often arise from the desire to limit costs for third party testing under existing protocols. Work group members pointed out that such a practice may be economically attractive to manufacturer, but carries significant cost for the work group.

PRESENTATION 4 – Jon Reeder (SIR Team Leader, Work Group)

Presenter raised question of whether or not leak detection monitoring service could be added to the list under a new name with the addition of some monitoring capability and peripheral devices without having to undergo recertification. General agreement among attendees was that a service is not a system and that adding peripheral sensors or transmitting devices to an already approved system did not constitute a simple name change. Therefore, listing under a new name was not appropriate. Additionally, those who desire to have a listing as a “continuous” leak detection system should have that system certified under the Continuous In Tank Leak Detection System or an equivalent protocol. (See policy statement in Session 1 minutes.)

SESSION 3 - September 15, 1999 - Afternoon

All work group members present. Guests, David Holtry and Teresa Trinh, California SWRCB.

OUST presentation by David Wiley. Presenter addressed current situation with protocols and outlined possible avenues for development, management and review. Discussion of limitations and advantages of each avenue. The oft stated consensus was that protocol development, review, and process management were not within the purview of the work group and that this area needed immediate attention and funding at EPA level.

SESSION 4 - September 16, 1999 - Morning

All work group members present.

The work group adopted the following policy statement on protocol development prior to system evaluation:

In the interest of expediting third party evaluation reviews, maintaining consistency among evaluations, and adhering to the accepted evaluation protocols, the NWGLDE has adopted the following policy:

In order for an evaluation to be listed, third party evaluation reports must clearly state which evaluation protocol was used to conduct the evaluation. The NWGLDE will not review any evaluations that do not follow either:

A. An EPA protocol, or

B. An alternative protocol reviewed and accepted by the NWGLDE.

Changes to an existing protocol must be discussed with and accepted by the NWGLDE before testing or before continuing testing if the evaluator identifies concerns during testing. Regular communication with work group members can expedite the review. For planning purposes, anticipate at least a six-month review process for a complete evaluation package.

Continuation of discussion of protocol review, development, and management. Final plan:

- 7 original protocols will be looked at by EPA's OUST.
- Existing non-EPA protocols that have been reviewed by the work group will be submitted for an independent peer review.
- Potential new protocols need to be submitted to the work group NLT April 1, 2000.
- After April 1, 2000, the work group will accept no further protocol submittals for work group

review approval.

In terms of competing priorities, work group members favored field performance evaluations over protocols over enforcement by the ratio (6:2:1).

SESSION 5 - September 16, 1999 - Afternoon

Team meetings and final adjustments to Work Group Policy memos and policy statements.

Discussion of outreach initiatives (EPA's ATG Handbook). Consensus that it should be expanded and distributed nationwide. California and South Carolina are each working on similar product for line leak detectors (varying in complexity). Also discussion of leak detection study (national) being conduct at UC Davis.

David Wiley will do limited print of this edition of list right now. Will support national meeting next spring with larger distribution.