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June 14, 1996

To: Automatic Tank Gauge Manufacturers

Subject: National Work Group requirements for Automatic Tank Gauging Systems's (ATGS) to be listed as capable of conducting 0.1 gal/hr leak tests

The attached letter was requested to clarify the workgroup's position on ATGS's being used to conduct precision testing for 0.1 gal/hr leaks. Any further evaluations conducted on ATGS's by KWA will take into account these requirements. According to this letter, ATGS certifications will not be listed on the workgroup list of methods capable of detecting 0.1 gal/hr leaks unless they have been evaluated according to the VTTT protocol. The workgroup's position may be significant to ATGS manufacturers in states that have adopted the workgroup list as the official list of certified methods. KWA will continue to support any certifications issued in the past and we are trying to determine what additional testing will be required to upgrade existing certifications to meet these requirements. If you have any questions regarding the attached letter please contact Beth DeHaas at (207) 287-2651 or Curt Johnson at (334) 271-7986.

Copies of this letter and other information regarding the leak detection industry may be obtained from the KWA World Wide Web server at: **<http://www.kwaleak.com>**



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

EDWARD O. SULLIVAN
COMMISSIONER

June 6, 1996

Mr. Ken Wilcox
Ken Wilcox Associates, Inc
19401 E. 40 Hwy, Suite 100
Independence, MO 64055

Dear Ken,

There seems to be some confusion over what protocol should be followed if an ATG vendor would like their equipment to be listed as a Volumetric tank tightness test method.

The protocol used must be EPA's Standard Test Procedures for Evaluating Leak Detection Methods: Volumetric Tank Tightness Test Methods (March 1990). The major differences between the ATG and the Volumetric protocols are that the Volumetric protocol requires that an empty/fill cycle be completed for every two tests (ATG protocol requires that an empty /fill cycle every four tests) and that product of a different temperature be added every two tests (ATG protocol requires product of a different temperature be added every four tests). Also as you know the leak rates used in the Volumetric protocol are 0, 0.05, 0.1 and 0.2 gph (vs 0, 0.1, 0.2 and 0.3 gph for the ATG protocol).

Any variations from the standard Volumetric protocol should be approved by the Workgroup in advance if the vendor wants to be assured that the results will be acceptable. In order for a system to be listed as a Volumetric tank tightness test method it has to be looked at as a stand alone device (i.e. - a contractor may move it from location to location in order to test different tanks). As such it has to compensate for all variables associated with a short duration test.

In order to be listed as a Volumetric tank tightness test method an ATG must also have an adequate method of determining and compensating for the pressure of groundwater on the outside of the tank. Most volumetric methods now on the market achieve this by raising or lowering the level of product to create at least a 1 lb. pressure differential at the bottom of the tank.

If a vendor wishes to use another method besides adjusting product level to compensate for groundwater pressure then it should be reviewed in advance by the Workgroup.

Currently the Workgroup is listing all ATG systems in the ATG category. If a vendor wants their method to be listed as being able to detect a 0.1 gph leak then leak rates of 0, 0.05, 0.1 and 0.2 must be

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used in the evaluation. No compensation for groundwater is necessary for ATG's. Many regulators may accept a 0.1 gph ATG test as acceptable leak detection for a yearly test as long as the system is left in place to detect water incursion on an ongoing basis.

Please be sure that anyone planning on having their ATG evaluated as a Volumetric tank tightness test method contacts me before the evaluation work begins. Working out the issues mentioned above in advance makes the review and approval process a much smoother one.

If anyone has questions about this they should be sure to contact me at 207-287-2651 or E-mail me at beth.dehaas@state.me.us

Sincerely,

A handwritten signature in black ink that reads "Beth DeHaas". The signature is written in a cursive style with a large, stylized initial "B".

Beth DeHaas
Volumetric Committee
National Workgroup on Leak Detection Evaluations

pc Russ Braucksieck, Ellen Van Duzee