



STATE OF MAINE

# DEPARTMENT OF ENVIRONMENTAL PROTECTION

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COMMISSIONER

To: Automatic Tank Gauge Vendors and other interested parties  
From: Automatic Tank Gauge and Volumetric Tank Tightness Testing Committees of the National Workgroup on Leak Detection Evaluations (NWLDE)  
Date: April 28, 1997  
Subject: Can Automatic Tank Gauges be used to test tanks with low levels (~50%) of product?

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Several Automatic Tank Gauge (ATG) vendors have contacted the NWLDE regarding using their ATG equipment to test at levels lower than the levels used during evaluation of their equipment. At the March 14, 1997 meeting of the NWLDE, the use of automatic tank gauges (ATGs) to test underground tanks at low levels was discussed. After some discussion the following was decided.

If a vendor would like their ATG equipment to be listed for testing at levels below those used during equipment evaluation, then the following requirements must be made.

1. The equipment must have been evaluated both at 90-95% and 50% full. At least 12 tests should be done at each level.
2. The evaluator must review the results of the evaluation and complete the additional calculations described in Section 7.3.5 (Test for Effect of In-Tank Product Volume) of E.P.A.'s standard protocol for evaluating ATGs. The results of this test must indicate that the equipment performed equally well at all levels, The results of all seven steps of this calculation must be submitted to the NWLDE.
3. The evaluator must inspect the model of probe used in the evaluation and determine the minimum depth of product necessary for the probe to function properly. This determination must be based on the technical and physical limitations of the equipment( e.g. temperature, product level and water level sensor location). An engineering drawing of probe construction that accurately shows the location of these sensors should be included with the letter from the evaluator.
4. A revised Results certification that includes the approved product level range must be signed and submitted by the evaluator.

If you or your evaluator have any questions about these requirements please contact one of the three people listed below.

- Ellen Van Duzee 208-378-5762  
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- Beth DeHaas 207-287-7883  
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