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June 13, 1996

MEMORANDUM

TO: Dr. Jairus D. Flora and Other Interested Parties

FROM: Curt D. Johnson, Chairperson
National Work Group on Leak Detection Evaluations

SUBJECT: Midwest Research Institute's Protocol for Evaluating Continuously Operating Release Detection Methods

The Midwest Research Institute's document, "Evaluation Protocol for Continuous In-Tank Leak Detection Systems", dated April 7, 1995, has been accepted by the National Work Group on Leak Detection Evaluations with the following provision:

> Methods that have been evaluated using this protocol and methods using this protocol in the future will be challenged on at least four active, known to be tight, tanks that have comparable throughput to the 80%-100% of the largest throughput data used in the third party evaluation. Real simulated leaks, that is, leaks that are generated by removing product from the tank, that leak at 0.2 gallon per hour when the tank is full and vary with head pressure will be used on the four tanks. Also, a no leak condition test will be provided on the same or similar tanks. This testing will be conducted blind to the vendor. The numerical results of these tests may not agree with the average leak rate because of the time periods when the instrument obtains useful data will probably differ from the average value of the leak rate that is obtained when the tank is active. However, the method must be able to correctly identify that the tank is indeed leaking, and be correct in all four tests that have simulated leaks.

Methods that have already been evaluated using this protocol need to perform third party tests in accordance with this provision and submit them to the Work Group within twelve months after the date of this memo.

The National Work Group on Leak Detection Evaluations is an independent work group comprised of state and federal UST staff. Therefore, this acceptance letter is not to be considered as an approval by any individual state or the EPA but rather the position of the Work Group. This protocol is intended to be used for release detection methods that gather useful data over extended periods within one month's time, without UST system shutdown, in order to test the system.

CDJ/rlb