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Pennsylvania Acceptance of NWGLDE listing for Dri-sump™ Containment Tightness Test Method

Martin, Randy <ramartin@pa.gov>
To: Danny Brevard <danny@dri-sump.com>

Fri, Feb 1, 2019 at 9:19 AM

Good Morning, Danny:

On December 22, 2018, amendments to 25 Pa. Code Chapter 245, Administration of the Storage Tank and Spill Prevention Program, became effective. A searchable pdf of the amended regulations can be found at the following link: https://www.pabulletin.com/secure/data/vol48/48-51/48_51_p2.pdf. Please note that this link does not contain the entirety of Chapter 245, rather only those sections that contain revisions.

As part of the regulatory amendments, 25 Pa. Code, Chapter 245, Section 245.437 and Section 245.31 were added. The highlighted sections below will be of interest to you.

245.437. Periodic testing.

(a) Owners and operators of underground storage tank systems shall ensure installed equipment for release detection and prevention is operating properly by meeting all of the following requirements:

(1) Containment sumps used for interstitial monitoring of piping in accordance with § 245.444(6) (relating to methods of release detection for tanks) and spill prevention equipment must meet one of the following:

(i) When the containment sump or spill prevention equipment is double-walled, the integrity of both walls shall be periodically monitored by maintenance walkthrough inspections as required under § 245.438 (relating to periodic operation and maintenance walkthrough inspections).

If walkthrough inspections are discontinued, the owner and operator shall comply with subparagraph (ii) and conduct a test within 30 days of the last inspection.

(ii) Containment sumps and spill prevention equipment shall be tested at least once every 3 years to ensure the equipment is liquid-tight by using vacuum, pressure or liquid.

(2) Overfill prevention equipment shall be evaluated at least once every 3 years. At a minimum, the evaluation shall ensure that overfill prevention equipment is set to activate at the correct level specified in § 245.421(b)(3) (relating to performance standards for underground storage tank systems) and must activate when the regulated substance stored reaches that level.

(3) Electronic and mechanical components of release detection equipment shall be tested for proper operation at least annually. At a minimum, required tests, as applicable to the facility, shall cover all of the following components and criteria:

(i) Automatic tank gauges and other controllers must be tested by:

(A) Testing alarm.

(B) Verifying system configuration.

(C) Testing battery backup.

(ii) Probes and sensors shall be tested by:

(A) Inspecting for residual buildup.

(B) Ensuring that floats move freely.

(C) Ensuring the shaft is not damaged.

(D) Ensuring cables are free of kinks and breaks.

(E) Testing alarm operability or running condition and communication with controller.

(iii) Automatic line leak detectors shall be tested to meet criteria in § 245.445 (relating to methods of release detection for piping) by simulating a leak.

(iv) Vacuum pumps and pressure gauges shall be tested to ensure proper communication with sensors and controller.

(v) Handheld electronic sampling equipment associated with groundwater and vapor monitoring shall be tested to ensure proper operation.

(b) Owners and operators of underground storage tank systems shall ensure tests and evaluations required under this section are performed in accordance with one of the following criteria:

(1) Requirements developed by the manufacturer.

(2) Code of practice developed by a Nationally recognized association or independent testing laboratory.

(3) Requirements determined by the Department to be no less protective of human health and the environment than the requirements in paragraphs (1) and (2).

(c) Owners and operators shall comply with the periodic testing requirements in this section as follows:

(1) For underground storage tank systems installed on or before December 22, 2018, owners and operators shall ensure tests and inspections as required under this section are performed prior to the next required underground storage tank inspection occurring after December 22, 2019, or not later than December 21, 2021, whichever occurs first.

(2) For underground storage tank systems installed after December 22, 2018, these requirements apply at installation.

(d) Test liquids used to perform tests as required in this chapter shall be reused, treated or disposed in accordance with applicable requirements in Chapters 91, 92a, 260a—270a and 287—299.

245.31. Underground storage tank system testing requirements.

(a) Tightness testing activities shall be conducted by a Department-certified underground storage tank system tightness tester (UTT), except when performed by an owner or operator using installed automatic tank gauging or monitoring equipment meeting requirements in § 245.444(2) and (3) (relating to methods of release detection for tanks).

(b) Tightness testing shall be conducted in accordance with equipment manufacturer's written instructions and using the recommended written practices, procedures and established test method protocols developed by the

sources in § 245.132(a)(1) (relating to standards of performance).

(c) A failed valid tightness test will, regardless of the test method, constitute a suspected release, except as provided in § 245.304(b) (relating to investigation and reporting of suspected releases). A failed valid tightness test conducted as part of an investigation of a suspected release constitutes a confirmed release.

(d) A complete written test report shall be provided to the tank owner as documentation of test results within 20 days of the test. The test methodology, a certification that the test meets the requirements in § 245.444(2) or § 245.445(2) (relating to methods of release detection for piping), and sufficient test data, which were used to conclude that the underground storage tank system passed or failed the tightness test, shall be included in the test report.

(e) Certified underground storage tank system tightness testers (UTT) shall maintain complete records of tightness testing activities for a minimum of 10 years as provided in § 245.132(a)(3) (relating to standards of performance).

(f) Tests or evaluations of spill prevention and overfill prevention equipment, containment sumps and release detection equipment required under this chapter shall be performed by a Department-certified individual holding the appropriate certification category and documented on a form provided by the Department. Results shall be maintained onsite at the storage tank facility or at a readily available alternative site and shall be provided to the Department upon request.

Pennsylvania does not approve or certify testing methods. However, it does appear that the Dri-sump™ Containment Tightness Test Method meets Section 245.437(b)(2) as long as the testing is performed following the manufacturer's instructions and the third-party certification. The sump and spill prevention testing would need to be performed by a DEP-certified individual with UMX, UMI, UTT, or IUM certification and documented on the DEP provided form. The form may be found here: <http://www.depgreenport.state.pa.us/elibrary/GetFolder?FolderID=43533>

If I can be of further assistance, please feel free to let know.

Thanks!

Randy D. Martin | Storage Tank Group Manager

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From: Danny Brevard <danny@dri-sump.com>

Sent: Friday, February 01, 2019 8:43 AM

To: Martin, Randy <ramartin@pa.gov>

Cc: info@Dri-sump.com

Subject: [External] Pennsylvania Acceptance of NWGLDE listing for Dri-sump™ Containment Tightness Test Method

Dear Randy,

Dri-sump™ Containment Tightness Test method now has the published listing with the NWGLDE. I know you have certified or licensed individuals that are currently providing testing and repair work in your state under your state rules.

With the listing, we are asking for confirmation that you will allow or accept this new test method to be used by those qualified individuals in your state.

Dri-sump can test any size or style of secondary containment sump or spill bucket including STP, Transitional, UDC or spill buckets using NO water, creating ZERO waste and the test is to the more stringent 0.10gph just like tank tightness testing. The test also saves a tremendous amount of time for the tankowner and tester since each test is only 1 minute.

You can access the NWGLDE Listing by clicking [HERE](#) or you can go to the www.nwglde.org website and access the listing by clicking on the "News and Events" or "Test Methods" and then "Secondary and Spill Containment Test Methods".

We have several tankowners, contractors and testers that are anxious to use this method in lieu of the hydrostatic method, so your response is much appreciated!

Sincerely,

Danny Brevard; PG

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[Click for Brevard LinkedIn Profile](#)

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