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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

ORLENE HAWKS
DIRECTOR

May 7, 2019

Mr. Danny Brevard, PG
Ac'cent Environmental
P.O. Box 3289
Lufkin, Texas 75903-3289

SUBJECT: Approval to Utilize Dri-Sump Containment Tightness Test Method (DSCTTM) as a non-volumetric tightness test method for testing required under the Michigan Underground Storage Tank Rules (MUSTR), 2018 AACR 29.2101 et seq.

Dear Mr. Brevard:

This letter is in response to your correspondence, dated March 6, 2019, requesting approval to use the DSCTTM as a non-volumetric containment tightness test for the testing of secondary and containment sumps required under MUSTR, Rule 29.2120, Section 280.35.

Prior approval is not required for the utilization of a system that is third party evaluated and certified to meet the requirements of The United States Environmental Protection Agency (EPA) "Standard Test Procedures for Evaluating Leak Detection Methods: Non-Volumetric Tank Tightness Testing Methods", EPA/530/UST-90/005, March 1990. You have provided with this submittal a third-party evaluation of the DSCTTM performed by Ken Wilcox Associates, Inc. that certifies this system as meeting those requirements.

The third-party evaluation of the DSCTTM by Ken Wilcox & Associates Inc, verifies that the DSCTTM is a non-volumetric tightness test performed on containment sumps, and is capable of detecting leaks that exceed 0.1 gallon per hour from the portion of the containment system being tested. This test is capable of detecting a release with the probability of detection of .95 and a probability of false alarm of 0.05, within 1 minute of the test start time.

The Storage Tank Division has determined that the proper utilization of the DSCTTM as a non-volumetric containment tightness test method will meet the requirements of MUSTR, Section 280.35.

Based on the above, your request for the approval of the DSCTTM as a non-volumetric containment tightness testing method is approved contingent upon the following:

1. The containment being tested must be free of any debris or measurable liquid.
2. Backfill can consist of sand, pea gravel, or silty clay.
3. Containment backfill can be moist but not saturated.
4. Vapor Stimulator Tubes must be installed per manufacturers procedures and instructions, including number, depth, and location (see VST chart).
5. Pre-test Verification is conducted per manufacture's requirements.
6. Test periods must be a minimum of one minute in length.

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The owner of DSCTTM is required to maintain a list of trained and qualified testers that are authorized to use this test method in Michigan, and is required to provide this office with an updated list whenever requested.

Noncompliance with any of the contingencies of this approval or if the conduct of this test and its procedures prove harmful to human health or the environment may result in the revocation of this approval.

If you have any questions please contact R. Jeff Tanner, STD at 517-335-2137 or tannerj@michigan.gov.

Regards,



Kevin Wieber
Storage Tank Division Manager

cc: STD Region Supervisors
STD HMSI
STD-Engineering Staff