

Questions

Virender,

As I indicated, you can check EPA rules and regulations regarding interstitial monitoring, If a site is required to do interstitial monitoring or has elected to do interstitial monitoring as a primary form of release detection for the piping, you will need the following:

- 12 months of interstitial monitoring records for the piping. (this overrides the need of a line tightness test)
- STP and UDC testing (Hydro)
- ATG/Sensors test

If in addition, they are required to have interstitial monitoring for the USTs or have elected to use interstitial monitoring for the USTS, they will need the following

- 12 months of interstitial monitoring records for the USTs
- ATG/Sensors test

Sincerely,



Loic Maniet

Virender,

Here the answers to your questions:

1. If the owner has 12 months of passing ELLD 0.2 test, they would not be required to perform an annual line tightness test. However, if the owner is required to perform interstitial monitoring, those ELLD records would not count.
2. Yes, hydrostatic or vacuum test is required even if you have double walled spill buckets
3. STP/UDC testing is required for any system installed on or after 9/2/2009 where interstitial monitoring is required as the primary form of release detection for the piping. If a site is pre 9/2/2009 and has elected for interstitial monitoring as their primary form of release detection for the piping, they would also be required to perform STP and UDC testing. The owner can also change that via the notification form and revert back to an annual line tightness test if the system is pre 9/2/2009.

The best resource will be to look into 40CFR 280. They do layout pretty well all the requirements. Now, keep in mind that Indiana has a different date than EPA when it comes to interstitial monitoring requirements compared to EPA. We do require that any system installed on or after 9/2/2009 be double walled and has interstitial monitoring as the primary form of release detection.

Sincerely,

Loic Maniet



