WASTE AND REMEDIATION DIVISION Waste & Underground Tank Management Bureau

POLICY MEMORANDUM

SUBJECT: Dri-Sump Testing

DATE: March 24, 2024

DISCLAIMER: The Department is in no way endorsing or advertising this product. This policy addresses only the specified applications for the product.

BACKGROUND:

Montana requires testing to be done by a licensed installer or compliance inspector according to ARM 17.56.303(2). See rule at: http://www.mtrules.org/gateway/RuleNo.asp?RN=17%2E56%2E303

ARM 17.56.306(1)(C) allows for alternative methods of containment tightness testing as long as the method is no less protective of human health and the environment than the requirements listed in (1)(a)(ii)(A) and (B). See the rule at

http://www.mtrules.org/gateway/ruleno.asp?RN=17.56.306 [mtrules.org]...

REQUIREMENTS: ☐ The Dri-Sump method cannot be the first tightness test performed after any modification or replacement of the sump, UDC, product piping, or piping boots. All post-construction tightness tests must be full-level hydrostatic.
☐ The wall of the component being tested must be in direct contact with the soil and/or pea stone. Any component containing an external wrap, sleeve, or outer barrier cannot be tested using this method.
☐ The Dri-Sump method cannot be used as the 1st tightness of any sump, spill containment basin, or under-dispenser containment. The initial test for the 2021 deadline must be performed using a hydrostatic or vacuum test. Subsequent tests may use the Dri-Sump method.
☐ Testing cannot be performed for a minimum of 1 hours after any precipitation event.
☐ The water table at the time of the test must be at least 3" below the lowest point of the component being tested. If the tester is unable to determine the depth to water using the Dri-Sump well, VST, or other on-site wells, than an alternate method must be used.
☐ The method cannot be used at any site undergoing active Soil Vapor Extraction treatment.
☐ The method cannot be used in saturated soil conditions; if the tester has any reason to believe the subsurface may be saturated, this method cannot be used.

□ The method may only be used if the concrete or pavement surrounding the component being tested and the VST is in good condition with no cracks or other damage.					
□ The Installer must be certified by Dri-Sump to install and test VST's.					

POLICY:

The following testing method done only by an installer or compliance inspector licensed by Montana DEQ is approved by the UST Program under ARM 17.56.306(1)(C).

- 1) Dri-sump Containment Tightness Testing
 - a) Must file a minor construction permit before installation of tubes and test equipment for dri-sump testing. Minor construction permit can be found at: https://deq.mt.gov/files/Land/UST/Documents/PDFfiles/
 https://dea.nt.gov/files/Land/UST/Documents/PDFfiles/
 https://dea.nt.gov/files/Land/UST/Documents/PDFfiles/
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 <a href="https://dea.nt.gov/files/Land/UST/Documents/PDFfiles/
 - b) Must only be done by an installer or compliance inspector licensed by Montana DEQ.
 - c) Return testing forms and site map to DEQ via email dequstprogram@mt.gov or mail to:

Department of Environmental Quality WUTMB - UST Section PO Box 200901 Helena, MT 59620-0901

- d) Must report suspected releases to a person within the department or to the 24-hour Disaster and Emergency Services duty officer available at telephone number (406) 324-4777 within 24 hours of discovery.
- e) Licensed testers must use the test method below:

AC'CENT Environmental Dri-Sump Containment Tightness Test Method SECONDARY AND SPILL CONTAINMENT TEST METHOD

Certification

Leak rate of 0.1 gph with PD = 100%, and PFA = 0%

Please be aware that the authority having jurisdiction in your particular state, territory, tribe or municipality may have set a minimum detectable leak rate for secondary and spill containment testing.

Applicability

For testing spill and sump containments that are free of debris or measurable liquid, located in non-saturated backfill consisting of sand, pea gravel, or clay/silt.

Specification

Containment must be free of debris and measurable liquid.

Containment backfill can be moist but not saturated with measurable liquid as verified by visual observation of liquid level in Vapor Stimulator Tubes (VST) or if the sump bottoms are deeper than the VST through observation wells located in the containment backfill.

VSTs shall be installed per manufacturer's installation training and certification procedures and instructions which include the minimum number of VSTs, placement and depth for each type of containment.

Vapor Stimulator Tubes (VST) Placement Chart

Containment Sump Type	Minimum Number of VSTs per Containment Sump	Maximum Horizontal Distance from Sump Wall	Minimum Length of VST	Backfill Soil Type Acceptance	Minimum Test Time for pass or fail results
Spill Bucket	1	8 inches (±1")	18 inches	All	1 minute
Under Dispenser Containment Sump (UDC)	1	8 inches (±1")	18 inches	All	1 minute
Transition Sump (UDC depth)	1	8 inches (±1")	18 inches	All	1 minute
Transition Sump (STP depth)	2	8 inches (±1")	36 inches	All	1 minute
Submersible Turbine Sump (STP)	2	8 inches (±1")	36 inches	All	1 minute

Verification a 5-10 second pre-test procedure. Communication will be verified between two VSTs

within the tank, piping, and dispenser in the same type backfill.

Waiting Time No waiting time before test begins.

Test Period Minimum of one minute once the test begins.

System Features

A leak is determined by observation of a change in the specialized laser light beam from a dot to a line which is indicative of the presence of the proprietary heavy vapor.

Comments

Dri-sump Containment Tightness Test method uses the proprietary heavy vapor aerosol

instead of water to completely fill the sump, interstice or vessel.

AC'CENT states this proprietary vapor aerosol is made from a formula of chemicals which are all food grade, pH neutral, non-petroleum based, non-toxic, non-flammable, and pose no environmental impact. The dissipation of the aerosol reverts back to normal organic elements in ambient air.

When installed per the manufacturer's placement requirements this method allows for detecting heavy vapor egress from the containment at any point. The method automatically tests for adequate flow of air and vapor through the backfill each time the system is activated. Any stoppage of flow through the VST or backfill will cause increased vacuum on the View Chamber that is quickly identified by a significant collapse of the View Chamber side walls.

Temperature is not a factor.

The evaluation testing was conducted with three different non-metallic commercially manufactured deep containment sumps, 300 gallon capacity, 47 inches diameter and 60 inches long. These were installed as would typically be found at a fuel service station. They were tested in different backfill types, including: sand; pea gravel, and clay/silt mix. The presence of water above the bottom of the sumps was not evaluated.

Danny Brevard, PG Evaluator: Ken Wilcox Associates

AC'CENT Corporate Offices 1125 Valley Ridge Dr

P. O. Box 3289 Grain Valley, MO 64029

Lufkin, TX 75903-3289 Tel: (816) 443-2494

E-mail: info@info@accent-us.com Dates of Evaluations: 10/04/18

URL: www.accent-us.com

Containment Tightness Test Report

Date:

						Date.	
Facility Name:				Owner:			
Address:			Address:				
City, State, Zip:			City, State, Zip:				
Facility I.D. #:			Phone:				
Tank Tag Number				•			
Product Stored							
Sump Type	☐ Spill Bucket ☐ UDC ☐ Transition ☐ STP	☐ Spill Bucket ☐ UDC ☐ Transition ☐ STP	□ Spill □ UDC □ Tran: □ STP		☐ Spill Bucket ☐ UDC ☐ Transition ☐ STP	☐ Spill Bucket ☐ UDC ☐ Transition ☐ STP	☐ Spill Bucket ☐ UDC ☐ Transition ☐ STP
Sump Capacity							
Construction	☐ Single-walled☐ Double-walled	_	□ Douk	gle-walled ole-walled	☐ Single-walled☐ Double-walled	☐ Single-walled ☐ Double-walled	☐ Double-walled
Liquid & debris removed	□ Yes □ No	□ Yes □ No	☐ Yes ☐ No		□ Yes □ No	□ Yes □ No	☐ Yes ☐ No
Visual Inspection (No cracks, loose parts or sump/pipe	□ Pass	□ Pass	□ Pass	;	□ Pass	□ Pass	□ Pass
separation points.)	□ Fail	□ Fail	☐ Fail		□ Fail	□ Fail	□ Fail
Communication: (in/WC)	Close:	VST:	Closed I Open Ho VST Co		Formula: C>O C>V and V≥O	Comments:	
Test in seconds							
Laser Verification	☐ Dot (pass) ☐ Line (fail)	☐ Dot (pass) ☐ Line (fail)	☐ Dot (¡☐ Line (☐ Dot (pass)☐ Line (fail)	☐ Dot (pass)☐ Line (fail)	□ Dot (pass) □ Line (fail)
	□ Pass	□ Pass	□ Pa		□ Pass	□ Pass	□ Pass
Final Test Results	□ Fail	□ Fail	□ Fai		□ Fail	□ Fail	□ Fail
		n and Laser results VST Location Map				(pass) Conduct se	cond test
Falled tests must be reported to a person within the department or to the 24-hour Disaster and Emergency Services duty officer available at telephone number (406) 324-4777 within 24 hours of discovery.							
Tester Name a	and Company t Information:						
Tester Cer	tification Info: Cer	tification #:				Cert Date:	
Equipment Certification Info:		Certification #:				Cert Date:	

Montana License #

Montana License Expiration Date.

Dri Sump Site Plan							
Facility Name:		Facility ID#:					
INSTRUCTIONS: Show location of VST's, sumps and piping, and buildings on property site. Clearly label these items.							
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(Inspector Initial)	(Date)						