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To: Montana Licensed Inspectors

From: Brett Smith

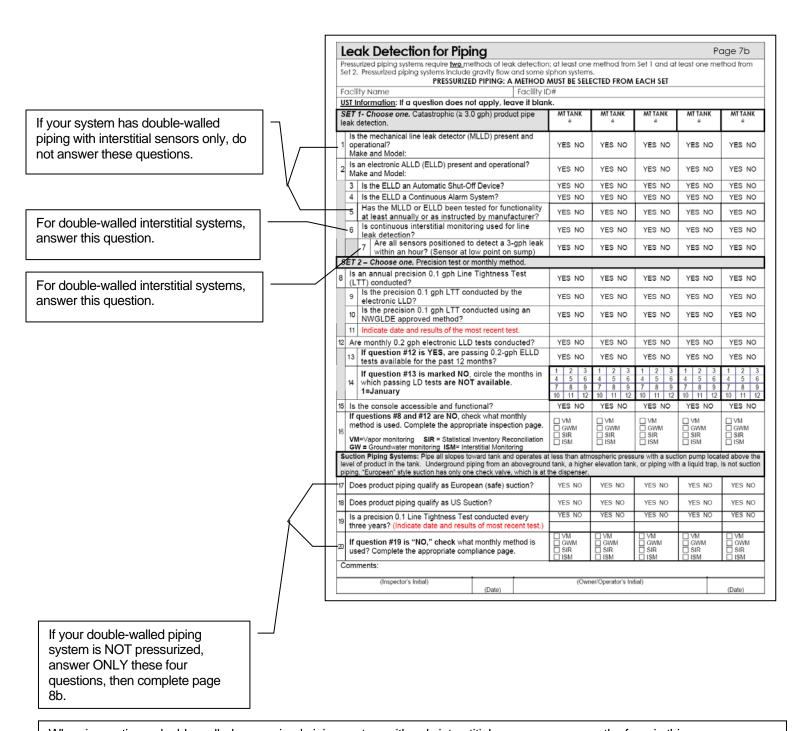
Date: January 18, 2006

Re: Proper Completion of Compliance Inspection Reports – Piping Leak Detection

Implementing new tools sometimes requires some adjustments. Such is the case with the new compliance inspection forms. The program needs to clarify that interstitial sensors are not Electronic Line Leak Detectors (ELLDs). Page 7b line 2 of the new forms is meant to ask if a transducer is installed into the STP packer housing. If one is not, answer "no" (or leave blank) even if continuous line leak detection is provided by interstitial monitoring. Answer "yes" on line 6 if continuous interstitial monitoring is used to satisfy the 3.0-gph leak detection requirement.

The diagram on the next page should help to clarify what we need when inspecting double-walled piping systems.

We are also having problems reading your signatures. Please print your name on the first page of the inspection so that we know who did it. Illegible signatures with no legible identification of the inspector will be returned.



When inspecting a double-walled pressurized piping system with only interstitial sump sensors, use the form in this manner:

- 1. Start by filling out question 6. Unless an MLLD or PLLD (or WPLLD or TS-LLD) is installed in the STP packer, do not fill out questions 1-5.
- 2. Answer question 7 as it relates to interstitial sensors.
- 3. Answer questions 15-16. Do not answer questions 8-14 unless a third-party tightness test is done annually or a PLLD is also installed on the piping system. You will then need to complete Page 8b.

If the system is not pressurized but involves European or US suction piping, DO NOT answer any of the questions 1-16. Only answer questions 17-20. You will then need to complete Page 8b.