

NEW EPA REGULATION COMPLIANCE DOUBLEWALL SUMPS AND FRP RETROFITS

Agenda – Feb 2, 2018



- Bravo 14 yr. history, doublewall products and experience
- New EPA federal regulations vs existing CA
- Doublewall secondary containment sumps
- Interstice monitoring options / dry interstice
- FRP entry fittings
- FRP retrofit fittings
- Fulfillment Center

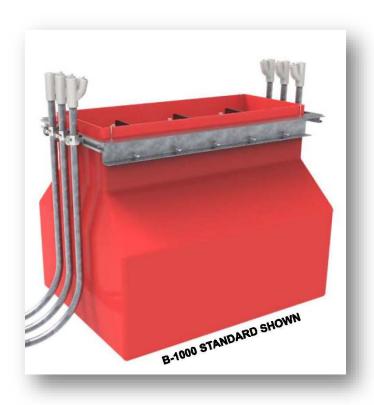
CONTAINMENT HISTORY

Containment History

Singlewall FRP Sumps





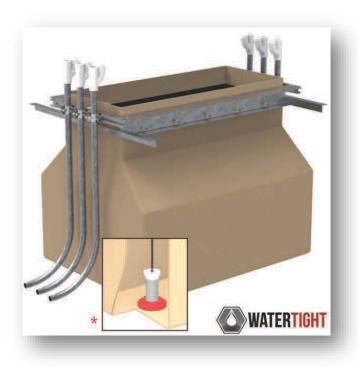


Containment History

Doublewall Monitored Sumps







NEW FEDERAL EPA REGULATIONS







40 CFR Parts 280 & 281

Compliance with Doublewall Sumps

And FRP Retrofit Fittings



New Federal EPA Regulations



Changes to the regulations include:

- Adding secondary containment requirements for new and replaced tanks and piping
- Existing sites with single wall sumps will be hydrostatically tested every three years. New vacuum technologies being developed and tested
- Double wall constantly monitored sumps will be exempt from testing – hydrostatic or vacuum



New Federal EPA Regulations



Cont'd:

 The deadline for testing in states with a non-approved state program is October 13th 2018

EPA thinks these changes will protect human health and the environment by reducing the number of releases to the environment and quickly detecting releases, if they occur.

EPA Regulations

2018 Federal EPA regulations vs. existing CA regulations



Key

Light color states = non-approved state programs, subject to federal regulation

Green color states = approved state programs, EPA has deemed state regulation to be as stringent as federal law

EPA Regulations



2018 Federal EPA regulations vs. existing CA regulations

- New EPA regulations are similar to long standing regulations in California - with some exceptions
- SB 989 (Testing of singlewall containment sumps)
 - **California has very specific testing methodologies**
- **Failures during the initial test cycle was 65%**
- AB 2481 (VPH constant monitoring / doublewall sumps)

EPA Regulations

2018 Federal EPA regulations vs. existing CA regulations

- Doublewall sump monitoring options in CA:
 - Vacuum, Pressure, or Hydrostatic
- Doublewall sump monitoring options federally:
 - Not defined

PMAA ANNOUNCMENT



May 12, 2017 WR-17-19
EPA APPROVES PMAA'S LOW LIQUID LEVEL ALTERNATIVE TEST METHOD FOR SUMPS

Provides major cost savings to Petroleum Marketers

The U.S. EPA's Office of Underground Storage Tanks (OUST) announced this week that it has approved PMAA's low liquid level integrity test as an alternative method for containment sump testing that is required under the 2015 federal UST regulations. The 2015 regulations require liquid testing every three years of all containment sumps used for interstitial monitoring of piping. However, the test method cited in the rule requires filling sumps with water above the penetration points in the sump wall. This sump test method would be prohibitively expensive for tank owners. Instead, the PMAA UST Task Force developed an alternative test for containment sumps.

DOUBLEWALL SUMPS



Constant monitoring accomplished by:

- Pulling a vacuum on the interstice.
- Filling the interstice with a monitoring fluid (hydrostatic) and having a sensor monitor fluid level change.
- OR, a dry interstice and use a sensor to detect fluid ingress. EPA
 has issued a compendium that disapproves this option.

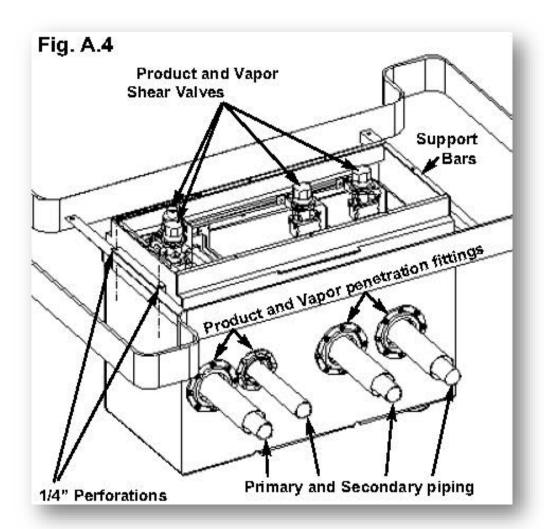






Key Steps:

- Prior to cutting the sump wall for piping be sure the vacuum gauge is above 12" HG
- The vacuum isn't released until the sump is penetrated for entry fittings





Doublewall sump testing is performed via the interstice as opposed to hydrostatic testing

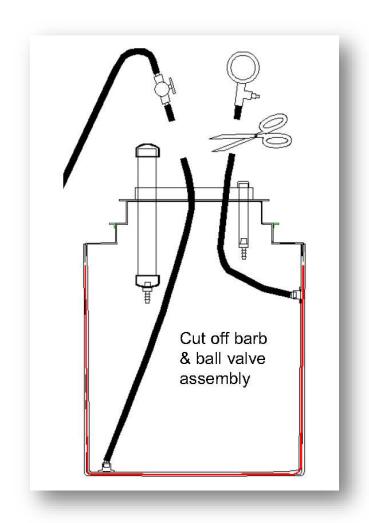
Doublewall Sumps VPH

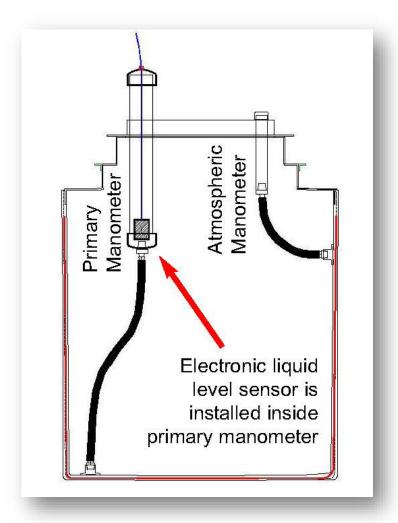


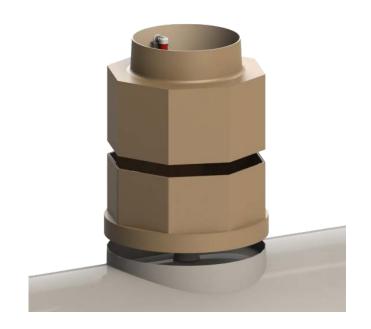


Doublewall Sumps VPH









Collar Mount



Tall Collar



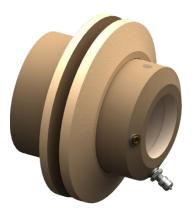
Riser Adaptor

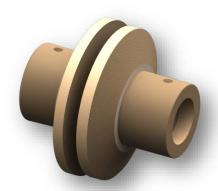
FRP ENTRY FITTINGS

For New Construction:

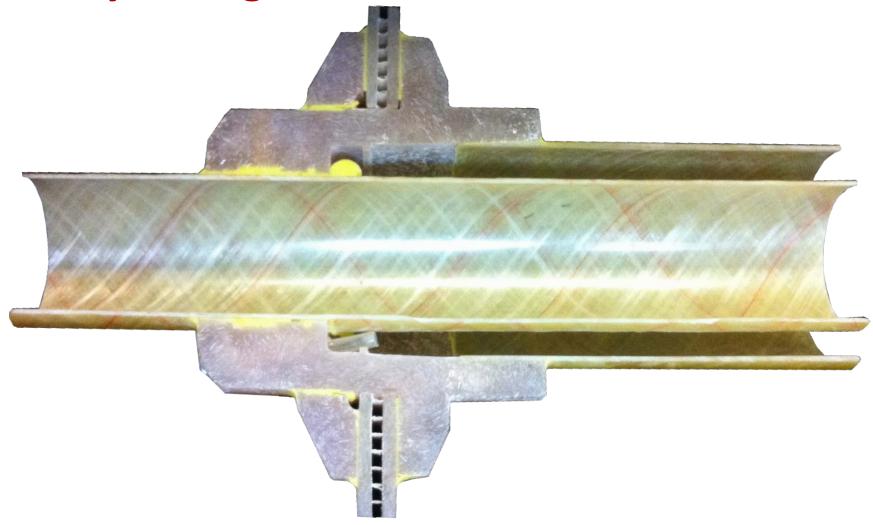
- All-Fiberglass F-Series "Full Body" entry for Product and Conduit
- "Tank-Spec" fiberglass with integrated external flange and loose interior flange
- Size over size for 2", 3", 4" & 6" FRP pipe
- Conduit models for 3/4" and 1" galvanized or PVC-coated conduit
- Dual test ports at 9 and 6 'o-clock with plug & shrader valve included
- Pipe / conduit sealed via adhesive injection
- Secondary has a standard tapered joint
- LCX models can pass through or terminate secondary within fitting











- The F-32U-T entry fitting is universal for both size over size and LCX pipe
- It is for both single- and doublewall sumps
- It is compatible with both series and parallel piping

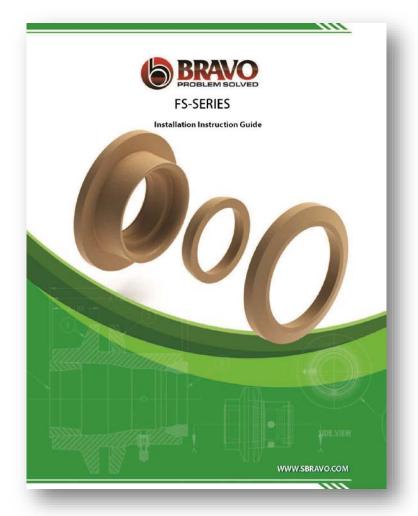








- Pass through versions are also available
- These will require a separate test reducer to terminate from primary to secondary pipe









Typical Size over Size

RETROFIT-S

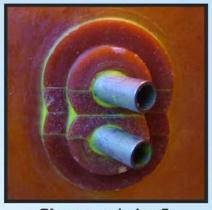
- PERMANENT AND FINAL SOLUTION
 TO ELIMINATE YOUR LIABILITY AND AVOID
 CONTAMINATION AND WATER INTRUSION.
- FAST AND EASY INSTALLATION
 EASIER AND FASTER TO INSTALL THAN
 CONVENTIONAL FLEXIBLE ENTRY BOOTS.
- ACCOMODATES ALL PIPING ANGLES AS HIGH AS 45° WITHOUT FAILURE.
- WHEN THE SWEEP BEGINS WITHIN THE WALL.



- ZERO MAINTENANCE
- ZERO CORROSION
- ZERO MATERIAL DEGREDATION
- THIRTY YEAR WARRANTY

FROM THE BRAND THAT INVENTED SECONDARY CONTAINMENT, GET YOUR





Close proximity & high angle



Product & Vapor lines



Fitting on curved sump







EP-100 (New), EP100-RF (Retrofit)

Ambient Temperature, (F°) Work Time in minutes Cure Time in hours

60°	45 min	6 Hours
70°	30 min	3 Hours
80°	25 min	2.5 Hours
90°	15 min	2 Hours

Less than 60°, Warm Epoxy to 70° before use Epoxy will stop curing at 40°



Nylon Adhesive

Ambient Temperature, (F°)	Cure Time in hours
50°	24
70°	18
90°	13
120°	10

- •Less than 45°, Warm Epoxy to 70° before use
- •Heat can be added to reduce cure time, must be safe for the environment and equipment



Adhesive-PE-Kit		
Max Open Time	10 Minutes	
Work Time	8 Minutes	
Time for Full cure	24 Hours	
Anticipated Shelf Life under conditions		
if Frozen 0° or below	1 year	
Below 40° or Refrigerated	6 months	
Ambient temp 76°	45 Days	
Ambient Temp 94°	22 Days	



Bravo Lamination Kit

FRP-407-Kit

Work Time in minutes based on proper resin to Cure Time catalyst ratio in hours

Less than 60°, store resin at 70° or indoors over night

60°	30	6 Hours
70°	20 min	3.5 Hour
80°	20 min	2.5 Hours
90°	12 min	2 Hours

More than 90°, Chill Epoxy to 70°

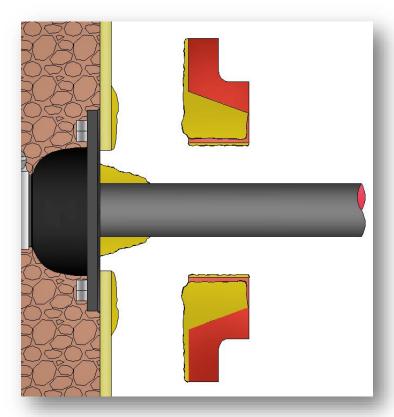
Summer Catalyst	2 bottles per gallon of Resin
Winter Catalyst	4 bottles per gallon of Resin

More than 90°, Chill Epoxy to 70° to extend work time

DRAFT/ WORK IN PROGRES

- Apply epoxy to wall before installing main split fitting body
- NOTE: The curved flange isn't needed if the wall is flat. Toss it!
- Apply liberal amount of epoxy to interior draft feature – almost full
- Press fitting body firmly into place using the alignment stripe as a guide



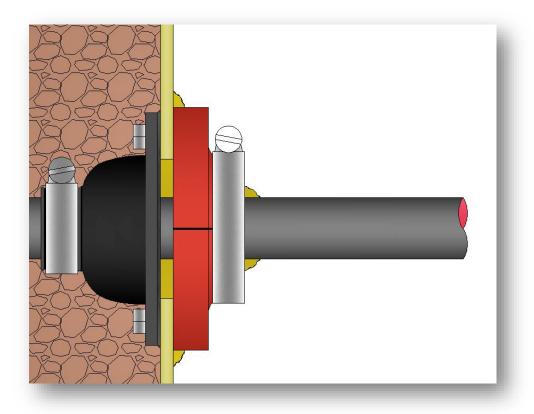


- Use the included hose clamp to secure the two halves of the fitting body together during cure
- Bead the epoxy that oozes out around all seams with a gloved finger

RECOMMENDED:

 Clean the face of the fitting with acetone to make it look presentable but do not wipe epoxy away from the primary seams at wall and pipe















Removal of the interior portion of the fittings



Surface prep and installation of the FRP sleeve adaptors



Completed FLX installation

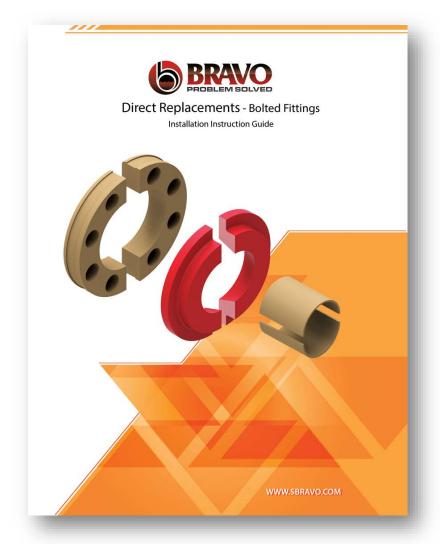


















- Remove interior portion of existing penetration fitting
- Clean and scuff the interior sump wall

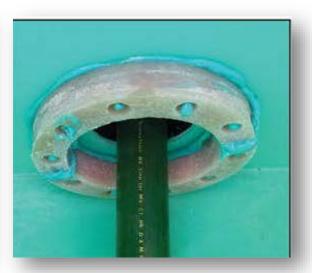














Place the mounting ring on the existing studs and tighten hose clamp









Install the nuts and clean up excess adhesive - complete installation









Seat the fitting flange in place firmly and ensure all beads are sealed

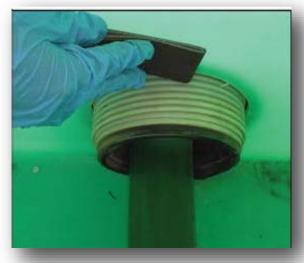


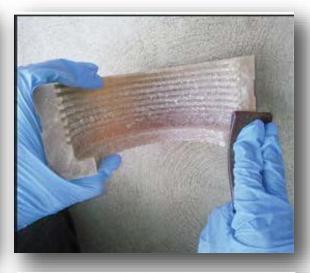






















FLEXIBLE PIPING

FLEXIBLE PIPING IDENTIFICATION

Visual identification chart used to identify common flex-pipes.



- **≻**Nupi
- **≻**UPP
- ➤ APT Poly Tech
- >APT XP

- > OPW CP 15 & 20
- OPW Flex-works
- Western FG
- > Environ Geo D & Plus

FLEX PIPE - NUPI





Nupi pipe is black polyethylene. It generally uses green electro fusion couplers.

FLEX PIPE - UPP







UPP pipe is either black or green. It is very similar to Nupi and comes in the same metric sizes. It is made from polyethylene.

FLEX PIPE - APT POLY TECH (1ST Generation)





4 bolts on end fittings

First generation APT had a polyethylene secondary. The primary is dark blue and the secondary is light blue. It's easily identified by the 4 bolt end fitting.

FLEX PIPE - APT - XP PIPE (2nd

Generation)





XP Pipe has a secondary made of nylon. The secondary is dark blue and the primary is light blue. It is easily identifiable by the 2 bolt end fitting.

2 bolt end fitting

FLEX PIPE - OPW CP-15 & 20 (Pisces)











OPW Pisces pipe has either a blue or purple secondary made of polyethylene.

FLEX PIPE - OPW FLEX WORKS





OPW Flex-works has a blue primary with a clear secondary made of PVDF.

FLEX PIPE - WESTERN FG (2ND Generation)





The current generation of co-flex pipe has a grey primary and a clear secondary made of PVDF.

FLEX PIPE - ENVIRON GEO-FLEX PLUS





Geo-Flex Plus was manufactured until Environ closed. It has a green primary and a clear secondary made of PVDF.

FLEX PIPE - ENVIRON GEO-FLEX D







Environ Geo-Flex D pipe has a white primary and a green secondary made of polyethylene.



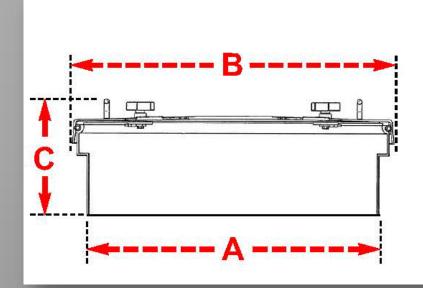
Retrofit water-tight "Snap-Lock" sump lids

NEXT-GENERATION DESIGN THAT MAKES TWIST-LOCK COVERS OBSOLETE...



TESTED TIGHT UNDER 5 FEET OF WATER





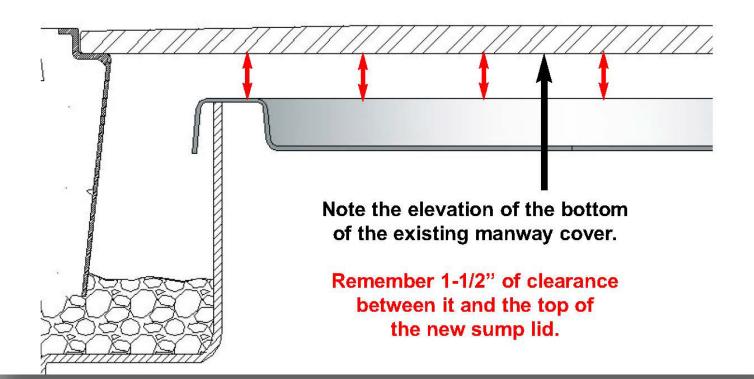
Part Number:	Reducer O.D. <mark>(A)</mark>	Maximum O.D. <mark>(B)</mark>	Total Ht. (C)
RC-32-10T-30-SL	30"	33-1/2"	12"
RC-32-10T-31-SL	31"	33-1/2"	12"
RC-32-10T-32-SL	32"	33-1/2"	12"
RC-32-10T-33-SL	33"	33-1/2"	12"
RC-32-10T-34-SL	34"	34"	12"
RC-32-10T-35-SL	35"	35"	12"
RC-32-10T-XX-SL	CHOOSE	≥ 33-1/2"	12"



2) Clearances

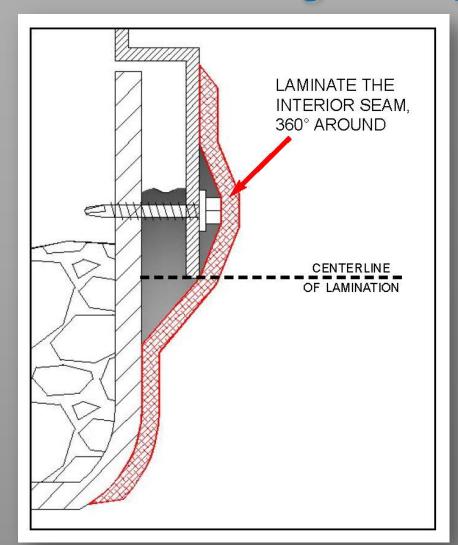
During all measuring, ensure that you plan for a minimum clearance of 1-1/2" from the very top of the Bravo SNAP-LOCK retrofit cover (fully assembled) to the bottom of the existing manway cover.

Dry fit the retrofit reducer into the existing tank sump reducer and ensure it fits INSIDE without issues.









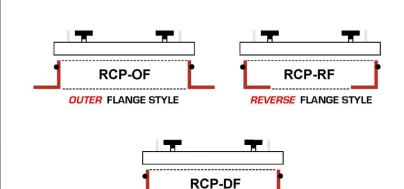
Laminate over the seam, covering the head of the screw











OF-OUTER FLANGED SL REDUCER					
	Flange	Flange	Assembled	Included Kits	
Part Number:	O.D.	I.D.	Height	Epoxy / PE	List
RCP-OF-SL32	42"ø	32"ø	5"	4 EP100 / 250ml PE *	\$ 977

DOUBLE FLANGE STYLE

RF-REVERSE FLANGED SL REDUCER					
RCP-RF-SL32	32"ø	23"ø	5"	3 EP100 / 250ml PE *	\$ 885

DF - DOUBLE FLANGED SL REDUCER					
RCP-DF-SL32	42"ø	23"ø	5"	4 EP100 / 250ml PE *	\$ 1125

FOR 8" INSPECTION PORT, ORDER: INSP-PORT-8INCH AT \$ 198 LIST

* ONE "MAN-GUN-FS-10" IS REQUIRED PER JOB SITE AT \$ 230 LIST



800-AT-BRAVO











Sand and clean the top 2" of the poly reducer.





Use a roller to incorporate PE Adhesive into C-Vail





Place C-Vail strips on the inside lip of the poly reducer and fold over the top.





Use a chamfer roller to smooth out the strips. The strips should over lap each other approximately 1".







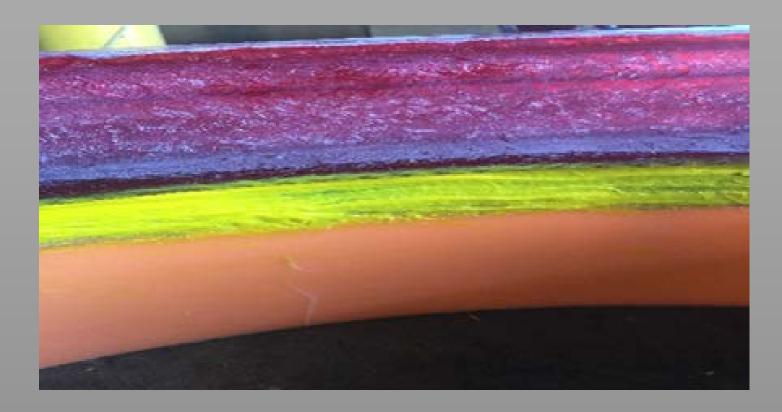






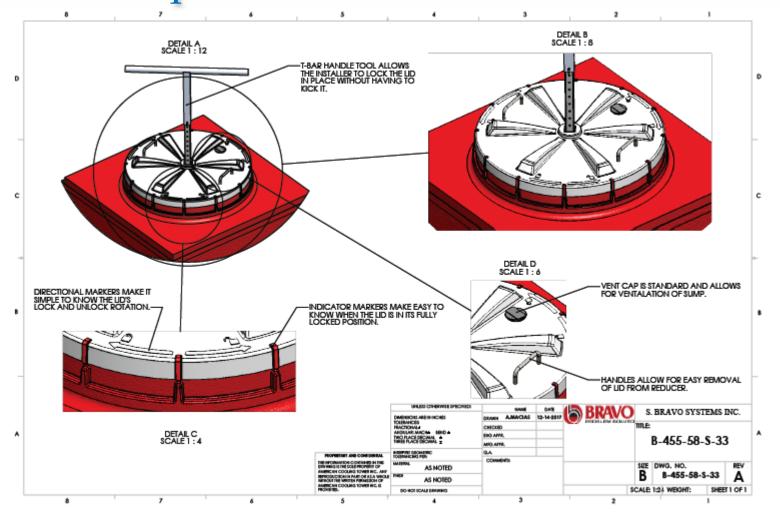
FRP Retrofit Fittings

Firmly press reducer into place and 45 the epoxy bead from the inside. Allow to fully cure before attempting to install lid.





NEW Torque Lock Lid



Q&A



Bravo retrofit fittings can never be field modified.



Bravo Retrofit-S series fittings handle 20 degrees of pipe angle without modification.



You can double the catalyst used in Bravo retrofit epoxy if the temperature is below 50 degrees.



All gel-coat must be removed before bonding FRP entry fittings to the sump wall.



No surface preparation is necessary for poly sump walls when installing a retrofit fitting.



6

Generous adhesive application is always emphasized when installing Bravo retrofit fittings.



Bravo Retrofit S fitting kits are universal for round or flat FRP sumps.





Epoxy will cure below 30 Degrees F.



All flexible piping is manufactured from the same type of plastics.



Bravo RCP Series retrofit water-tight sump lids can be used on polyethylene tank sumps.



Double wall constantly monitored sumps must be hydro tested every three years.



Single wall and double wall sumps use the same entry fittings.



No tool is needed to tighten TCI direct replacement retrofit fittings.



Bravo epoxy adheres to fiberglass, steel, PVC, & PVDF.



When dealing with flexible piping you should always dry fit the FRP sleeve adaptor and trim as needed.



Direct replacement retrofits can only be used on FRP sumps.



All retrofits except direct replacements are universal for round or flat sump walls



Retrofit sump lid configurations are available for FRP sumps, poly sumps, and adjustable height.



Bravo yellow epoxy can be used as a substitute for poly adhesive if none is available.



Bravo has a flexible pipe identification chart available you can use to determine what the appropriate adhesive is for flexible piping.



Double wall sumps with dry interstice monitoring have the float sensor in a low point as opposed to hydrostatic sumps which have the sensor near the top of the sump.



The sump wall must be dry and all water intrusion must be stopped before bonding a fitting to the wall.



When installing the mounting ring for a studded direct replacement fitting you should always tighten the band clamp before tightening the nuts on the studs.



You can use any manufacturers epoxy to install Bravo retrofit fittings



You should never overcoat exposed poly adhesive with EP-100RF (Bravo epoxy).



Hose clamps must always be removed from the FRP sleeve adaptors when installing FLX Series retrofit fittings.



Double wall sumps require 3 layers of lamination to attach to a tank collar.



You must always maintain 1.5" of clearance between the highest point on your sump lid and the bottom of the traffic cover.