Testing Automatic Line Leak Detectors (ALLD)

A recent change to the Underground Storage Tank (UST) rules require that all Automatic Line Leak Detectors (ALLD) be tested using a method that simulates a leak. The vision behind this new rule is to ensure: (1) the quality of ALLD performance tests; (2) consistency among testing procedures that will ultimately benefit the testers, the owner/operators, and the people of Utah; and (3) the prevention of catastrophic releases.

The new rule requires that an ALLD test must simulate a leak and observe an appropriate response. Additionally, only a certified Utah UST Tester with the proper “ALLD endorsement” may perform such tests.

**Mechanical Line Leak Detectors (MLLD)**
- Test must simulate a leak each time they are tested.
- This is an annual test requirement.

**Electronic Line Leak Detectors (ELLD)**
- Must have an Initial simulated leak test, and as required due to major repairs or replacements.
- After the initial simulated leak test, future annual ELLD test can be as simple as a passing test from your system.

If you have questions concerning your ALLDs, please contact the Division of Environmental Response and Remediation (DERR) UST Section at (801)-536-4100.
Federal UST regulations require that all UST systems with pressurized piping be equipped with an ALLD. The rule requires that the ALLD be:

- Capable of detecting a 3 gallon per hour leak within one hour.
- Able to notify the owner of the presence of a leak.
- Third party certified to meet all necessary performance standards.

In the past, facilities having double walled piping were able to use a sump sensor to function as a leak detector. In order for this to meet the ALLD requirement, the entire containment system (piping, sump, and sensor) needs to be third party certified on an installation-by-installation basis. To date, the DERR does not know of any sump sensor systems that have been third party certified as leak detectors. Due to the difficulty and expense of obtaining third party certification, the DERR highly recommends the installation of an ALLD to meet this requirement.

Currently, sump sensors functioning as leak detectors are required to be tripped into alarm status once per year (annual functionality test). You can continue to utilize your sump sensor functioning as a leak detector until your current functionality test for your sensor expires. At that time, you must submit proper third party documentation or document the installation of an ALLD to the DERR. It should be noted that this only applies to the ALLD requirement and in no way affects the continued use of sump sensors as a monthly monitoring device. If you have questions regarding your sump sensors or the ALLD requirement, please contact Victor Scherer at (801)-536-4240.

New Certification and Testing Requirements

By David Wilson

Cathodic Protection Testing

- All CP testers must be certified with the DERR.
- NACE certification or other acceptable level of training is required.
- This is an endorsement to the Tester Certification.

Line Leak Detector Testing

- Must be tested by a UST Certified Tester.
- This is an endorsement to the UST Tester Certification.

Installer/Technician

A person must have the Installer/Technician endorsement if they work on any portion of the UST system that is critical to the integrity of the system, which includes:

- Line Leak Detector.
- Repairs on any portion of the UST system.
- Automatic Tank Gauging (ATG).
- Probes/Sensors.
- Overfill and spill devices.
- Containment sumps.
- Sub-pumps.

All contractors performing UST work in Utah must be certified through the DERR, and have a current certification card with the applicable endorsements. To become certified, they must submit an application to the DERR with documentation of training in the type of work they do.

Check with your contractor to ensure they have the proper certifications to work on your UST system. If you have question or comments, please contact David Wilson at (801) 536-4100.
Efficient Facility Management—just a click away
By DeAnn Rasmussen

Clicking on the DERR’s UST web page will open a handbook to Utah’s UST tank program. By accessing undergroundtanks.utah.gov many questions regarding the operation of a facility can be answered. The web site consists of two primary sections: 1) the UST Compliance Section and 2) the Leaking Underground Storage Tanks (LUST) Program.

Topics within the UST Compliance Section consist of:
- How to install and close USTs.
- How to have a successful UST inspection.
- How to obtain a Certificate of Compliance.
- Details about the low-interest Petroleum Storage Tank (PST) Loan Fund available for upgrading, replacing, or closing USTs.
- UST Certification Program – contact information, lists of individuals certified by the DERR to perform work related to USTs, study guides, dates, and locations of exams
- Current and past issues of “Utah Tank News”.
- Utah’s PST Trust Fund – what is required and how it works.
- Utah UST Rules – downloadable in both PDF and Microsoft Word 2000.
- UST and LUST Lists – facilities with notified tanks and facilities with reported releases.

Topics within the Leaking Underground Storage Tank (LUST) section consist of:
- Reporting Spills – what you need to know when you call us.
- UST Fields – information about Utah’s Brownfields Pilot projects.
- Remediation and Abatement – Subsurface Investigation Report, recommended clean-up levels, and UST Tier 1 and Tier 2.
- Tier 1 screening levels – downloadable PDF file.
- PST Fund – Details on the PST Fund, reimbursement forms, approved labor rates, work plan contract and direct pay request forms, eligibility applications, and request for payment vouchers.
- State of Utah Certified Consultants, samplers, labs, UST Removers and Installers, and information on how to become certified.
- UST and LUST Lists – facilities with notified tanks and facilities with reported releases.

Thanks to the outstanding work of project managers in the UST and LUST sections, the UST’s web page has become a great source of information. Questions and comments regarding the web site may be e-mailed to Dave Wilson at DJWILSON@utah.gov for the UST Compliance Section, or Michael Percorelli at MPECORELLI@utah.gov for the LUST Section.

UST TESTING WORKSHOP
- 30 in attendance
- Sponsored by the DERR
- Held December 2, 2004

Thank You Maverik Country Stores, Inc. for your support and for providing refreshments.

UST INSTALLER/TECHNICIAN WORKSHOP
- Over 30 attendees
- Sponsored by the DERR
- Held March 2, 2005

Big thanks to FLYING J, Inc. for refreshments and support.
CERTIFICATION CORNER

PETCON
www.petconinc.com
1-800-852-8374
Installer course
Remover course
Cathodic Protection Tester Course
Solutions Course (re-certification for all certifications except Consultant)
UST Technician Course (for individuals that perform repairs on UST systems)

UVSC
(801) 863-8117/8677
Groundwater/Soil sampler

ECI
(801) 373-2727
Groundwater/Soil Sampler
By appointment

Re-certification
Tests are given the first Tuesday of each month.
For more info call David Wilson at
(801) 536-4138

www.undergroundtanks.utah.gov

Environmental Consultant
Contact Melissa Turchi at
(801) 536-0078