



HOW DO I PROVE THAT MY SYSTEM IS NOT CURRENTLY LEAKING?

◆ FOR TANKS

1. Daily Inventory Control **AND** Tank Tightness Testing (DIC) *

- Requires daily stick readings, which are then compared to records of sales and deliveries. You must reconcile the stick readings and inventory records at least once each month.
- Send the 6 most recent months of records.
- The tank tightness test must have been done within the last five years. The tightness test must be sophisticated enough to detect a leak of 0.1 gallon per hour.

2. Automatic Tank Gauging (ATG)

- Send a recent leak status report for one day from each of the last 6 months on each tank. *Note: Make sure that the tank has the appropriate level of product in it to run a valid leak test, per the third-party certification of the equipment.*
- Each leak status report must indicate "pass."

3. Statistical Inventory Reconciliation (SIR)

- Send the 6 most recent months of records from your SIR vendor. *(Must be done monthly and received by owner/operator by the 15th of each month.)*

4. Manual Tank Gauging (MTG) * *(This method may only be used if your tank is 2,000 gallons or smaller. It is often used for small waste oil or kerosene tanks. The tank must be idle (unused) for a certain period of time.)*

- Send the 6 most recent months of records.
- If tank is more than 1,000 gallons, must also submit tank tightness test.

5. Vapor Monitoring (VM)

- Send 12 months of records, if available. At least 6 recent months of records and initial soil vapor concentrations are required.
- Send "as-built" drawings for each well and a scaled site diagram showing the location of each well, boundaries of tank pit(s), pipe trenches and explanation of number of wells/locations.

6. Groundwater Monitoring (GWM)

- Send 12 months of records, if available. At least 6 months are required.
- May only be used if groundwater is within 20 feet of surface, and soil is gravel, coarse to medium sand, coarse silt, or similar type.
- Requires a site assessment by qualified person to determine the number and placement of wells, or must send "as-built" drawings.
- Monitoring device must be able to detect 1/8 inch of free product on top of the groundwater in the well(s).

7. Visual Interstitial Monitoring (IM)

- Send a manual log with at least 6 months' records.
- Appropriate to use only for double-walled systems or systems with secondary barrier.

8. Continuous In-Tank Leak Detection System (CITLDS) **

- Send at least the 6 most recent months of Continual Reconciliation Reports. *(This provides a quantitative leak rate based on various data continuously collected by a processor which may include product-level monitoring, temperature monitoring, dispensing data, delivery data and point-of-sale records.)*
- Please note that CSLD or SCALD is not CITLDS. They are continuous tank gauging methods but are not acceptable leak detection methods for high throughput facilities.

9. Vapor Monitoring with Chemical Marker (VMCM) **

- Send at least the most recent 6 months of records; must show results every 15 days.
- Send “as-built” drawings and scaled diagram, as described under #5 above.

10. Continuous Electronic Interstitial Monitoring (CEIM) **

- Send at least the 6 most recent months of records on tanks and piping. Software printout required.
- Must document passing readings at least once every thirty (30) days.

Please note: *If you have a brand new tank system, are putting tanks back in use after they have been out of use for a while, OR you are a new owner of a previously insured facility, please contact our office for options on what type of records can be provided to prove your tank system is not currently leaking.*

◆ **FOR PRESSURIZED PIPING, YOU MUST HAVE A LINE LEAK DETECTOR, AND**

You must send:

- documentation that the line leak detector has been checked during the last year to make sure it is working.

AND

- results from a line tightness test done within the last year, or
- appropriate records from vapor monitoring, groundwater monitoring, interstitial monitoring, (as noted above), or
- 6 recent months of SIR reports, or
- 6 recent months of CITLDS, VMCM or CEIM records, (as noted above).

◆ **FOR SUCTION PIPING, YOU MUST HAVE EITHER**

- results from a line tightness test within the last 3 years, or
- appropriate records from vapor monitoring, groundwater monitoring, interstitial monitoring of the piping, (as noted above), or
- 6 recent months of SIR reports.

(There are some situations in which you can avoid these requirements for suction piping; call 800-765-2765 for details.)

* DIC and MTG can only be used for a 10-year period.

** Appropriate for high throughput facilities (>800,000 gallons monthly).