

Pennsylvania Department of Environmental Protection
Division of Storage Tanks
July 5, 2016

IMPORTANT NOTICE

Continuous In-Tank Leak-Detection System Concerns

The Department has recently become aware of situations in which substantial, continuous releases do not cause an alarm on Automatic Tank Gauge (ATG) consoles using Continuous In-Tank Leak-Detection Systems (CITLDS).

CITLDS programs, such as Veeder-Root's CSLD and INCON's SCALD, collect data during idle periods. While CITLDS programs have the advantage of not requiring several consecutive hours of inactivity, idle periods remain necessary for CITLDS programs to collect enough data to complete a test.

Most CITLDS programs rely on float sensors and a pre-programmed dispensing flow-rate. A continuous leak from the tank may go undetected, as these releases may appear to the CITLDS program as product being dispensed.

In order to identify a continuous release without an alarm, look for the following information on CITLDS Tank Release Detection reports:

- Verify the dates of the most recent valid tests. Ensure that all of the test dates match the date of the printed report. Test dates prior to the report date may indicate that the tank has not had enough idle time to produce current test results.* Some ATG consoles will not print out failed or inconclusive test results, and will only report the most recent passing test results.
- Ensure that each of the twelve months listed in a history report confirms a passing test result for each of the preceding 12 months. If any monthly test date is more than 12 months in the past, the CITLDS program was unable to produce a passing test for the most recent occurrence of that month.*
- Look for "No Idle Time" alarms in the alarm history (Veeder-Root).*

*If these conditions exist, it is necessary to immediately confirm whether or not the tank is releasing product. This can be accomplished by preparing and reviewing inventory reconciliation records in accordance with EPA Guidance "Doing Inventory Control Right for Underground Storage Tanks" (EPA 510-B-93-004); by removing the tank in question from service to conduct a manually initiated in-tank static leak test; or by completing a tank tightness test.

In order to prevent future generations of leaking underground storage tank systems, correct interpretation of the regulations and thorough evaluation of release detection records is important. If you have questions or desire clarification of the above, please contact the Division of Storage Tanks at (717) 772-5599 and ask to speak with a member of the Underground Storage Tank Unit.