



ORIGINAL: 2532

1815 Gallagher Road | Plymouth Meeting, PA 19462 | (610) 278-7203 | (FAX) 278-7621

RECEIVED
2006 JUN 21 PM 1:13
INDEPENDENT REGULATORY
REVIEW COMMISSION

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA, 17105-8477

Crompco, LLC would like to submit the following comments concerning the proposed rule changes to Chapter 245:

245.31(e) Underground storage tank tightness testing requirements. Crompco feels that the 20 day requirement to submit a written test report to the owner is too quick a timeframe to turn a report around and have it in the hands of the owner. Rather, a standard 30 day submittal would be in order. The state and regional office is required to be notified in the event of a tightness test failure by the DEP certified tester within 24 hours of conducting the test so the state is already aware and has the results when a tank or line fails a tightness test immediately. There should be no urgency for requiring the owner to have passing tightness test results in hand quicker than 30 days. Crompco has a process that all tests results must go through (including quality control, invoicing and submittal) before test results are passed along to the customer and a 20 day timeframe to turn around results would create a problem getting the results "out the door" so quickly.

245.421(b)(4)(ii) Installation. Concerning the testing of sumps, UDC's and spill buckets. Crompco feels that although testing these containment devices at installation is a step in the right direction, further measures should be taken by PA DEP to periodically verify the performance of this equipment. Specifically, testing these devices at periodic intervals such as annually for spill containment buckets and a minimum of every 3 years for UDC's and sumps used for interstitial monitoring of secondary piping. Once these devices are installed and tested after installation, very often they are forgotten about and according to the manufacturers, there is not an indefinite lifespan of this equipment. Crompco has significant testing data to back our position up showing a tightness testing failure rate of approximately 70% of installed spill buckets. FL DEP has also done a study which indicates the source of 35% of tank system leaks are due to faulty spill buckets. Manufacturers suggest an expected life of about 5 years for spill buckets. We all know that these are installed for well more than 5 years, way past the life expectancy of the bucket. Crompco has found that faulty spill buckets are a major source of contamination and releases at UST sites and not periodically testing these devices for tightness should not be an acceptable practice. CA, FL and MD have all taken the position and made the right move in going to periodic testing because they see the problems associated with these devices over time and they realize that they do not last forever. No periodic testing means that this equipment will be installed and then forgotten about. Now is the time to take action to prevent future releases due to this equipment. In addition, the tightness testing of the sumps, UDC's and spill buckets should be limited to an individual that has UTT certification as many of the factors that affect a tank tightness test also affect the testing of these devices (temperature, deflection, etc.). A certified UTT tester can identify these factors and take appropriate measures to eliminate these factors as erroneous test results.

Certification Activities:

Crompco strongly feels that there are several UST activities that should be covered under the UTT certification category; however, currently many activities are only covered by the UMX certification category which limits services that can be performed by certified UTT individuals we feel are more than capable of performing the same activities. Crompco feels that DEP should permit the following activities to be performed by persons with a UTT certification and not limit these activities to individuals with UMX certification:

- Replacing mechanical (not electronic) line leak detectors (like for like as well as install new ones where there are none present in a submersible transfer pump)
- Replacing overflow ball floats (like for like as well as install new ones when none are present or if they are broken or inoperable)
- Replacing overflow droptubes (like for like or replacing a straight droptube with an overflow droptube)
- Functionality testing of line leak detectors (both mechanical and electronic for 3gph @10 psi leaks) should only be performed by persons with UTT certification
- Replacement of packer o-rings and functional elements on submersible transfer pumps
- Removing and reinstalling STP motors (not including replacement of a motor) as long as the pump is accessible from grade without excavation
- Any and all stage II vapor recovery testing activities should be conducted only by persons with UTT certification (pressure decay, dynamic backpressure/liquid blockage, air to liquid ratio, and any other stage II vapor recovery tests which may be adopted in the future by the air quality division of PA DEP) since manipulation of all associated tank components is a routine part of conducting vapor recovery testing activities
- Containment sump, UDC sump and spill bucket tightness testing activities should only be conducted by persons with UTT certification
- All cathodic protection testing activities should only be done by UTT, UMX, NACE or STIP3 certified individuals
- Replacement of any and all tank top components as long as excavation is not required (fill adapters - both swivel and non-swivel, stage I vapor poppets - both swivel and non-swivel, ATG caps, P/V vent valves, vapor caps, spill bucket drain valves, interstitial monitor caps, spill buckets which require no excavation for replacement) should only be done by UTT and/or UMX certified individuals.



Please verify receipt via email!

UNDERGROUND TANK, LINE & VAPOR RECOVERY TESTING AND COMPLIANCE MANAGEMENT SERVICES

1815 Gallagher Road
Plymouth Meeting, PA 19462
Tel: 610-278-7203 • 800-646-3161
Fax: 610-278-7621
email: ed@crompco.com
www.crompco.com

EDWARD S. KUBINSKY, JR.
Special Projects Manager

