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To:
RegComments@state.pa.us
Environmental Quality Board
Rachel Carson State Office Building
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Harrisburg, PA 17101-2301.

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INDEPENDENT REGULATORY
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To Whom It May Concern:

The following comments on the proposed amendments to Chapter 245 are submitted by:

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245.444 Methods of release detection for tanks.

This proposed amendment changes the requirement for tightness tests performed by an automatic tank gauge(ATG) from that portion of the tank that routinely contains product to 90% of the overfill set point.

Monthly testing of tank by a automatic tank gauge to 0.2 GPH is not the same as tank tightness testing to 0.1 GPH. The EPA has separate third party testing protocols for tightness testing and monthly monitoring, most ATG's do not have third party for tank tightness testing. I believe the intent of this change is for tank tightness testing and not for monthly ATG monitoring. Recommend that only paragraph 3(tank tightness testing) be changed and paragraph 4 (ATG monitoring) remain the same. If paragraph 4 is changed , it will require the tanks to be filled to the top at least once a month at huge expense if normal volume is always less that 50%..

245.445 Methods of release detection for piping.

The proposed amendment will require the line leak device to shut off the flow of regulated substance when a leak is detected. I assume that this change applies to the detection of a 3 gallon per hour leak rate and not to the monthly monitoring 0.2 GPH leak detection requirement? The amendment should include the required minimum leak rate for shut down. Automatic shut down at 0.2 GPH or less, has and will result in many false alarms resulting in considerable loss of revenue.

If automatic shut down is required, even at 3 gallon per hour, owners will disable or bypass this function(jumper the relay) when false alarms prevents him from selling product. This has happened in the past and defeats the purpose of automatic shut down to contain leaks. In my opinion the best method to achieve the desired leak detection containment(short of double wall piping) is for mechanical line leak detection(3 gallon per hour) with automatic slowing of flow when a leak is detected. This method is not easy to bypass and will cause the station operator to take action by calling a servicing company so that he can sell product. Requiring a service log to be maintained, will track leak detection occurrences and actions taken. This log should be available for inspectors to review.

Also, there is a miss conception regarding this amendment . Some have assumed the proposed amendment to mean electronic line leak detection is required. Recommend that wording be clear as to the intent and requirements of this amendment.

Hughes, Marjorie

From: JWCSYS@aol.com
Sent: Monday, June 26, 2006 2:19 PM
To: RegComments@state.pa.us
Subject: 25 PA. CODE CH. 245 comments on changes to

Sir:

Download attached Microsoft doc contains comments for the Board on subject changes.

Contact me if you have any trouble with downloading.

Best Regards

Joe Caldwell
303 684-8536

6/26/2006