



New Jersey Municipal Environmental
Risk Management Fund
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May 14, 2012

**NEW PERIODIC TESTING AND CONSTRUCTION REQUIREMENTS FOR
ABOVEGROUND STORAGE TANKS (ASTs) WITH UNDERGROUND PIPING**

If any of your locations are listed, then you have been identified through the Fund's environmental engineer as having buried piping attached to your aboveground storage tank. If no location is shown, and your facility meets the following description, please contact Birdsall Services Group, the Fund's environmental engineer immediately.

LOCATION:

Owning and operating an underground storage tank (UST) system can be an expensive and risky endeavor. Consequently, many of our Environmental Joint Insurance Fund (EJIF) members have installed above-ground storage tanks (ASTs) for their liquid fuels and chemicals. These ASTs often store gasoline for vehicles, diesel fuel for emergency generators and heating oil for boilers. Although the ASTs are inherently safer to own and operate than underground systems, EJIF members are experiencing substantial environmental damages and losses due to discharges from the underground piping associated with those ASTs.

Many ASTs have underground piping systems, but they do not have corrosion protection or leak detection monitoring to protect the entity in the event of a discharge or failure in the underground piping. As a result, underground leaks may go undetected for a long time, causing considerable damage to the environment and leaving the entity extremely vulnerable to expensive claims that may even exceed the EJIF level of protection.

In response to this growing concern for our members, the EJIF Commissioners and Fund professionals have adopted the attached policy that requires specific testing of underground piping. The inspections, testing, and record keeping outlined in the policy are designed to help members improve their level of protection. A list of certified vendors is included for your reference. There is also a reimbursement process for testing fees through your EJIF membership.

Please note that the compliance date for current EJIF members is 7/1/2013. After 7/1/2013, new EJIF members AND current members that acquire the above described system must demonstrate compliance with the attached standards in order to secure coverage for that system.

Should you have any questions or wish to discuss anything related to the new testing policy, please feel free to contact Jared Eudell at (908) 497-8900 ext. 6279 or jeudell@birdsall.com.

EJIF Underwriting Managers,

Danskin Insurance Agency
PO Box 285
Spring Lake, NJ 07762
732-449-3800

Conner Strong & Buckelew
PO Box 2017
Toms River, NJ 08754
732-736-5263

Environmental Joint Insurance Fund (E-JIF)
Periodic Testing & Construction Requirements for Aboveground Storage Tanks with Buried Piping
Systems

1. SCOPE

- a. This document constitutes the testing requirements for all existing and new members of the Environmental Joint Insurance Fund (EJIF) who operate an aboveground storage tank that is equipped with underground piping.

2. APPLICABILITY

- a. These testing requirements apply to all aboveground tank systems which are equipped with buried product piping and which convey the following:
 - i. Motor fuel;
 - ii. Petroleum products which are liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute);
 - iii. All substances which are liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute) listed in Appendix A of N.J.A.C. 7:1E; and
 - iv. Used oil (Waste oil).

3. EXEMPTIONS

- a. Any EJIF member who maintains continuous compliance with the release detection methods and construction requirements detailed in N.J.A.C 7:14B-4 and 7:14B-6 for their buried piping system shall be considered to be in compliance with these testing requirements.

4. TESTING FREQUENCY

- a. **These testing requirements are required on a biennial (every other year) basis for all applicable EJIF members, effective for all existing and new members beginning March 7, 2012, with a compliance deadline of July 1, 2013.**
- b. Evidence of successful testing should be forward to:

MAIL: Birdsall Services Group
65 Jackson Drive, Cranford, NJ
ATTN: JARED EUDELL

FAX: 908-497-8942

EMAIL: jeudell@birdsall.com

5. APPROVED BURIED PIPING TEST METHODS

- a. Appendix A of this document includes an overview of acceptable test methods for buried piping
- b. Soil and/or groundwater samples submitted in lieu of the methods detailed in Appendix A will not be accepted as a means of demonstrating compliance with this standard.
- c. Alternative methods for demonstrating compliance will be considered, but **MUST** be approved by the EJIF Engineer (Birdsall) in advance of any implementation of that method. Methods determined by the Engineer as not meeting the EJIF requirements will not be accepted for demonstrating compliance.

6. SUGGESTED VENDORS

- a. Below is a list of third-party unaffiliated vendors who are approved by the State of NJ who can provide these services:
 - i. ATS Environmental
 - Contact: Kristi Clune
 - Phone: 800-440-8265 x107
 - Certification #: US269276
 - kristi@atsenvironmental.com
 - www.atsenviro.com
 - ii. Crompco, LLC
 - Contact: Garrett Brodie
 - Phone: 800-646-3161 x977
 - Certification #: US00070
 - garrett.brodie@crompco.com
 - www.crompco.com
 - iii. Charles J. Hoffman Jr & Son
 - A. 732-681-1985
 - B. Certification #: US302506
 - C. www.hoffmanntankremoval.com
 - iv. Accurate Tank Testing, LLC
 - A. 201-848-8224
 - B. Certification #: US00006
 - C. www.oiltanktesting.com
- b. In the event the owner/operator chooses to select an alternate vendor for testing, said vendor must be licensed by the NJDEP to perform the testing requirements.

7. APPROVAL PROCESS

- a. Once BSG has received evidence of a continuous leak detection system or results of testing of product piping completed in accordance with the criteria described above, BSG reserves the right to inspect the site and system to verify the information submitted. Once completed, a letter will be provided to the owner/operator with our evaluation of the information submitted and recommendations on required actions (if necessary). If denied, recommendations for corrective action will be provided.

8. REIMBURSEMENT PROCESS

- a. Results of one of the approved testing processes need to be submitted first to Richard Erickson (Birdsall Services Group) for review. Upon approval, these results will be forwarded on to the Executive Director of the EJIF (PERMA) for reimbursement of up to \$400.00 per test.
- b. Contact - Richard Erickson; Sr. V.P.; Birdsall Services Group
65 Jackson Drive
Cranford, NJ 07016
P – 908-497-9800 x 6175, F 908-497-8942
RErickson@Birdsall.com

Appendix A – Testing Standards

Buried Piping Construction Type	Minimum Tightness Test Standards	Testing Frequency
Metallic Piping (New & Existing)	<p>Any test method which meets:</p> <p>EPA Standard Test Procedures for Evaluating Leak Detection Methods (EPA/530/UST-90/004 through 010)</p> <p>And has been endorsed by the:</p> <p>National Work Group on Leak Detection Evaluations</p> <p>That meets the following Line Tightness Test Method conditions:</p> <ol style="list-style-type: none"> 1. The test method can determine a leak rate or quantity of at least 0.1 gallons per hour (gph) 2. The test method has a probability of detection (Pd) of at least 95.0% 3. The test method has a probability of false alarm (Pfa) of 0.05% or less. 	<p>Piping systems that meet the applicability in Section 2 above:</p> <ul style="list-style-type: none"> • Testing to be conducted annually. <p>Exempt piping systems as specified in Section 3 above:</p> <ul style="list-style-type: none"> • Testing to be conducted in accordance with N.J.A.C. 7:14B-6.
Non-Metallic Piping (New & Existing)		
<p>Double Walled Piping*</p> <p><i>*Both the inner and outer piping must pass an industry standard Tightness Test</i></p>		

Online Resources:

1. National Work Group on Leak Detection Evaluations (NWGLDE)
 - a. www.nwglde.org/downloads.html
2. NJDEP Release Detection Requirements
 - a. www.nj.gov/dep/srp/regis/ust/ust_06.pdf
3. EPA Standard Test Procedures of Evaluating Leak Detection Methods
 - a. www.epa.gov/oust/pubs/protocol.htm