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E-JIF BULLETIN #20-01

DATE: JULY 15, 2020

TO: FUND COMMISSIONERS

FROM: UNDERWRITING MANAGER: Danskin Insurance Agency/Conner

Strong& Buckelew

SUBJECT: Periodic Testing & Construction Requirements for Aboveground

Storage Tanks with Buried Piping Systems - Revised July 2020.

Reimbursement Available for Mandated Testing – See Section 8

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:
 - 1. Motor fuel;
 - 2. Petroleum products which are liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute);
 - 3. 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
 - 4. 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. This protocol has been in effect since March 7, 2012.
- b. Evidence of successful testing should be forwarded to:

BERGEN, MORRIS, SOUTH BERGEN, SUB ESSEX, NJUA CAMDEN, MONMOUTH, OCEAN, PMM, SUB MUNICIPAL, CENTRAL, TRICO, BURLCO

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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 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. POTENTIAL VENDORS

- a Below is a list of third-party unaffiliated vendors who are approved by the State of NJ who can provide these services:
 - 1. Crompco, LLC
 - Contact: Garrett Brodie
 - Phone: 800-646-3161 x977
 - Certification #: US00070
 - garrett.brodie@crompco.com
 - www.crompco.com
 - 2. Charles J. Hoffman Jr & Son
 - 732-681-1985
 - Certification #: US302506
 - www.hoffmanntankremoval.com

- 3. Accurate Tank Testing, LLC
 - 201-848-8224
 - Certification #: US00006
 - www.oiltanktesting.com
- b. Whatever vendor the owner/operator chooses for testing, said vendor must be licensed by the NJDEP to perform the testing requirements.

7. APPROVAL PROCESS

a Once the Environmental Engineer has received evidence of a continuous leak detection system or results of testing of product piping completed in accordance with the criteria described above, the Environmental Engineer 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 the Environmental Engineer 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. Please visit the EJIF website at <u>www.njejif.org</u> for the proper voucher. On the Home Page, click on "New Requirements for Aboveground Storage Tanks With Underground Piping" and then click on "AST UGP Voucher"

Appendix A – Testing Standards

Buried Piping Construction Type	Minimum Tightness Test Standards	Testing Frequency
Metallic Piping (New & Existing)	Any test method which meets: EPA Standard Test Procedures for Evaluating Leak Detection Methods	Piping systems that meet
Non-Metallic Piping (New & Existing)	(EPA/530/UST-90/004 through 010) And has been endorsed by the:	the applicability in Section 2 above: Testing to be conducted annually. Exempt piping systems as specified in Section 3 above: Testing to be conducted in accordance with N.J.A.C. 7:14B-6.
Double Walled Piping* *Both the inner and outer piping must pass an industry standard Tightness Test	 National Work Group on Leak Detection Evaluations That meets the following Line Tightness Test Method conditions: The test method can determine a leak rate or quantity of at least 0.1 gallons per hour (gph) The test method has a probability of detection (Pd) of at least 95.0% The test method has a probability of false alarm (Pfa) of 0.05% or less. 	

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/regs/ust/ust_06.pdf
- 3. EPA Standard Test Procedures of Evaluating Leak Detection Methods
 - a. www.epa.gov/oust/pubs/protocol.htm