

Comments submitted by:

Ed Kubinsky, Jr.
Special Projects Manager
Crompco, LLC
1815 Gallagher Road
Plymouth Meeting, PA 19462
Direct Office Line: (610) 276-5914
Email: ed.kubinsky@crompco.com

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It is our opinion that **prior** to performing any pressure decay test on any gasoline underground storage tank system after decommissioning, there are 2 tests that should always be performed:

- A test of all Pressure/Vacuum Vent Valves should be conducted in accordance with CARB TP 201.1E (10/8/2003). This ensures that the P/V Valve or valves are all functioning properly. Just because a pressure decay test passes the test does not mean that the P/V valve or valves are working properly. If the valve is stuck in the closed position, the tanks may operate under excessive vacuum or over pressurize which could cause damage to the tank system or release excessive gasoline vapors to the atmosphere. Testing the P/V Valves every time a pressure decay test is performed ensures the gasoline tank system is maintaining the appropriate amount of pressure or vacuum in the tank system and the P/V Valves will open should excessive pressure or vacuum levels be reached for whatever reason. Also, if P/V valves are not functioning properly, it could throw tank inventory level readings off and cause the owner to perform unnecessary testing and calibrations to investigate inventory discrepancies due to tanks not venting properly.
- A Vapor-Space Tie-In Test in accordance with CARB TP 201.3C (3/17/1999) Test Option 2 (Section 6.3, page 5 of the test procedure document). This test ensures that the tester is performing the pressure decay test on all of the gasoline tank systems. Once stage II systems are decommissioned, it is possible and in some cases it is probable that some of these “manifolded systems” will no longer be manifolded in the vapor space and a separate pressure decay test will need to be performed on each individual gasoline UST system (Regular, Plus, Super) to ensure each tank system is vapor tight. If the Vapor-Space Tie-In test is not performed, a tester could assume that he (or she) tested all gasoline tanks when in fact they only tested one of the tanks and not the others. Stage II systems are manifolded because all gasoline tanks share one common vapor line that ties all gasoline tanks together underground 99% (if not higher) of the time. Once stage II systems are decommissioned or disconnected from the UST’s, it is very possible that some of these systems will no longer be manifolded depending on what was done during decommissioning. It is critical for the tester to verify that all gasoline tanks are being tested for vapor tightness, that is the objective of performing the Vapor-Space Tie-In test.

I have attached these two test procedures for your reference. Thank you for the opportunity to comment.

http://www.arb.ca.gov/testmeth/vol2/tp201.1e_Oct2003.pdf

http://www.arb.ca.gov/testmeth/vol2/tp201.3c_Mar1999.pdf