



NORTH CAROLINA
Environmental Quality

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL SCOTT
Director

December 18, 2018

To: Scott Sharp
Armor Shield of America
11888 Snider Road
Cincinnati, OH 45249

Tony Rieck
T.R. Consulting, Inc.
5351 Setters Way
Colorado Springs, CO 80919

Re: Armor Shield of America Retrofit Sump System

Mr. Sharp / Mr. Rieck:

This is in response to your request for a review of the above-referenced Armor Shield of America Retrofit Sump System to ascertain if it meets the definition of an acceptable repair method for damaged containment sumps. The North Carolina Department of Environmental Quality (NCDEQ) – Underground Storage Tank (UST) Section has reviewed the specifications and information that you provided to us. Based on your provided information and a review of Title 15A North Carolina Administrative Code, Subchapter 2N “Criteria and Standards Applicable to Underground Storage Tanks” (15A NCAC 2N), we have concluded that the Armor Shield of America Retrofit Sump System would be an approvable means of restoring a failed containment sump to operational compliance provided that the following conditions are followed:

1. Only single-walled containment sumps are eligible for repair.
2. All repaired containment sumps will be considered single-walled even if the double-walled construction procedures listed in the Armor Shield repair procedures are used.
3. Upon completion of repair work, containment sumps constructed under this procedure must be tested in accordance with the testing protocol listed in PEI/RP1200 “Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities”.
4. Periodic testing of containment sumps constructed under this procedure must be tested in accordance with the testing protocol listed in PEI/RP1200 and would not be eligible for low level hydrostatic sump testing methods.
5. The “Sump Modification Checklist” submitted to NCDEQ as part of this review must be modified to include a place where the UST Facility ID number, assigned by NCDEQ, can be recorded.
6. Within thirty days after any repairs take place, a copy of the “Sump Modification Checklist” and site drawing documenting the work must be submitted to NCDEQ. Note: A copy of these documents should also be retained by the owner.



7. Within thirty days after any repairs take place, a copy of the UST-6F/23B "Triennial UST Containment Sump / UDC Integrity Testing" form documenting the testing of the sumps must be submitted to NCDEQ. Note: A copy of these documents should also be retained by the owner.

If you have any questions, feel free to call me at (919) 707-8163.

Sincerely,



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