



North Carolina Department of Environment and Natural Resources  
Division of Waste Management

Pat McCrory  
Governor

Dexter R. Matthews  
Director

John E. Skvarla, III  
Secretary

February 28, 2013

To: Wayne Boyd  
Emco Wheaton Retail  
2300 Industrial Park Drive  
Wilson, NC 27893

Re: Emco Wheaton A1005-517R-CM Spill Bucket Repair Kit

Mr. Boyd:

This is in response to your request for a review of the above-referenced Emco Wheaton A1005-517R-CM spill bucket repair kit to ascertain if it meets the definition of an acceptable repair method for damaged OPW 500 and 700 series spill buckets. The North Carolina Department of Environment and Natural Resources (NCDENR) – 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 removal of an existing primary spill bucket of a OPW 500 or 700 series spill bucket and replacement with a double-walled stainless steel Emco Wheaton A1005-517R-CM would not be considered a repair, but would rather be considered a new installation of a spill bucket. Furthermore, the UST Section has concluded that the Emco Wheaton A1005-517R-CM would be an approvable means of restoring a failed OPW 500 or 700 series spill bucket to operational compliance provided that the following conditions are met:

1. The Emco Wheaton A1005-517R-CM spill bucket physically replaces the primary spill bucket of the OPW 500 or 700 series spill bucket,
2. The outer wall of the preexisting OPW 500 or 700 series spill bucket must be of adequate condition as to isolate the Emco Wheaton A1005-517R-CM from the backfill at the time of installation or potential contact with the backfill in the future (e.g., the existing outer wall cannot be removed, have the bottom cut out, etc.),
3. The space between the exterior of the Emco Wheaton A1005-517R-CM and the outer wall of the preexisting OPW 500 or 700 series spill bucket must remain empty (e.g., the space cannot be filled with gravel, water, etc.),
4. The Emco Wheaton A1005-517R-CM spill bucket is installed in accordance with manufacturer’s written guidelines per 15A NCAC 2N .0906,
5. The interstice of the Emco Wheaton A1005-517R-CM spill bucket is continuously monitored through the use of a third-party certified liquid-detecting sensor per 15A NCAC 2N .0901,
6. The liquid-detecting sensor used to continuously monitor the interstice of the Emco Wheaton A1005-517R-CM must be used in conjunction with a compatible monitoring console that can provide a printed record of both release detection monitoring results and alarm history.
7. The liquid-detecting sensor used to continuously monitor the interstice of the Emco Wheaton A1005-517R-CM must be tested for functionality annually and documented in accordance with 15A NCAC 2N .0901. The test results must be subsequently documented on the UST-22B “Annual Interstitial Sensor Operability Check” form.
8. The inner and outer wall of the Emco Wheaton A1005-517R-CM spill bucket is hydrostatically or vacuum tested after installation per manufacturer’s written guidelines to verify that the repair was completed correctly per 15A NCAC 2N .0906. The test results must subsequently be documented on the UST-6D/23A “Triennial UST Spill Bucket Integrity Testing” form and provided to the tank owner for their records.

9. The inner and outer wall of the Emco Wheaton A1005-517R-CM spill bucket must be tested for integrity once every three years following installation in accordance with the manufacturer's written guidelines per 15A NCAC 2N .0906. The test results must be subsequently documented on the UST-6D/23A "Triennial UST Spill Bucket Integrity Testing" form.

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

Sincerely,



Matt A. Wegner  
Environmental Engineer  
Department of Environment and Natural Resources  
Division of Waste Management - Underground Storage Tank Section  
(919) 707-8163

cc: Ruth Strauss