

ROY COOPER Governor MICHAEL S. REGAN Secretary MICHAEL SCOTT Director

May 27, 2020

To: Mr. Alex Conklin

Fairfield Industries, Inc. 4483 Choppee Road Georgetown, SC 29440

Subject: Fairfield Industries, Inc. Double-Walled Spill Bucket

Model: SCM-5D-NCGC

Mr. Conklin,

The North Carolina Department of Environmental Quality (NCDEQ) - Underground Storage Tank (UST) Section has reviewed your request to evaluate the Fairfield Industries SCM-5D-NCGC double-walled spill bucket as to whether it meets the performance standards set out in Title 15A North Carolina Administrative Code, Subchapter 02N "Criteria and Standards Applicable to Underground Storage Tanks", Section .0900 (15A NCAC 02N .0900). Based on the information you have provided, the Fairfield Industries SCM-5D-NCGC is a five-gallon double-walled spill bucket constructed of steel and installed within a HDPE gravel guard/pan. The design also includes a pre-installed third-party certified liquiddetecting sensor (i.e., Gems Sensor LS-3) to monitor the interstice of the double-walled spill bucket. Based on the information you have provided, NCDEQ - UST Section has concluded that the Fairfield Industries SCM-5D-NCGC would meet the requirements of 15A NCAC 2N .0900, provided it is always installed within the non-metallic gravel guard / pan, so as to isolate the steel bucket from the backfill, uses a third-party certified method of continuous interstitial monitoring, such as the listed liquid-detecting Gems Sensor LS-3, and is installed in accordance with the manufacturer's written guidelines. Please note, that using an electronic liquid-detecting sensor, as opposed to a continuous interstitial monitoring method that uses vacuum, pressure or hydrostatic method will require integrity testing of the interstice at installation and every three years thereafter (e.g., a vacuum test, hydrostatic test, etc. as defined by the manufacturer) and should be designed with that in mind. Furthermore, please note that electronic sensors used for leak detection are also required to be tested for operability on an annual basis and should also be considered in the design.

Should you have any questions, please do not hesitate to contact me at matt.wegner@ncdenr.gov.

Sincerely,

Matt A. Wegner Engineering Associate

North Carolina Department of Environmental Quality

Division of Waste Management Underground Storage Tank Section

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