



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

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Darren Sanderson
Hall Tank Company, LLC
PO Box 5787
N. Little Rock, AR 72119-5787

January 23, 2013

Subject: Hall Tank Company, LLC Plasteel (Elutron) Double-Wall Jacketed Steel Tank
(20,000 gallons, 120" diameter)

Dear Mr. Sanderson:

Pursuant to your request, The North Carolina Department of Environment and Natural Resources (NCDENR) – Underground Storage Tank (UST) Section has reviewed the revised test data and procedures that you submitted on December 10, 2012. Based on the submitted information, as well as interstitial monitoring instructions submitted by Veeder-Root on 12/20/2012, it appears that the subject tanks will comply with the electronic liquid detecting sensor requirements in 15A NCAC 02N.0901 and .0903, providing that the following conditions are maintained:

1. The Veeder Root Position-Sensitive sensor is installed in accordance with the "Installation and Operability Testing of Veeder-Root Position Sensitive Sensor (Part #794380-323) In Steel Tank Interstitial Areas", received 12/20/2012. A standard tank cross-section detail (or a notation on the design plans) shall also be submitted with the UST-6A (Pre-Installation) application, which indicates the appropriate monitoring tube diameter for these sensors. Tank owners or operators will need to test the sensors and maintain written records in accordance with the manufacturer's guidelines and 15A NCAC 02N.0901. The annual operability check shall also include documentation of the "Sensor Out" alarm and "normal" conditions for these sensors (FYI: I have included a copy of the Veeder Root sensor installation instructions).
2. Periodic integrity testing of the tank interstitial space is conducted, in accordance with the "Evaluation of Plasteel Interstitial Monitor for Air and Liquid Leaks", as revised by Ken Wilcox Associates, Inc, October 1, 2012 and written records maintained, as required by 15A NCAC 02N.0903. Periodic integrity testing must be conducted before UST system start-up, between six months and the first anniversary of start-up and every three years thereafter.

3. Testing must be done in accordance with the procedures and test durations specified in the "Plasteel Underground Tank, Appendix B, Interstitial Vacuum Test (IVT), submitted by Hall Tank Company on 12/10/2012", which is based on the aforementioned 10/01/2012 KWA evaluation. The required 45.42 hours (water) test time for the 20,000 gallons tank is listed in the revised Figure 6.0 (KWA Table 5) of the 12/10/2012 "Interstitial Vacuum Test (IVT)".
4. The 10/01/2012 KWA report does not appear to be listed on the National Working Group for Leak Detection Evaluations (NWGLDE) website. The subject report should also be transmitted to the National Working Group (NWGLDE) for review. Concurrence by the NWGLDE will ensure it meets the EPA equivalency standards and provide consistency among regulatory agencies. Therefore, this letter constitutes a Conditional Approval for the aforementioned 10/01/2012 KWA Test Report for interim use in accordance with 15A NCAC 02N.0903. This Conditional Approval will be valid for twelve months to allow time for NWGLDE review. This will also allow facilities to use this procedure during this interim period. After the NWGLDE review process is completed, final approval of the Report can be transmitted.

The aforementioned instructions and procedures should be provided to all customers/contractors that install the subject tank in North Carolina. Note that the KWA revised test method only included the larger monitoring tube calculations for the 20,000 gallons tank. Therefore, this evaluation does NOT include other tanks listed in the KWA Evaluation, tanks containing biodiesel fuels (biodiesel content greater than 20%) or alcohol/gasoline blends greater than 10%. Any tanks, monitoring equipment or testing procedures that are not specifically listed herein must be separately evaluated by this Department for compliance with the applicable regulations prior to its use. Feel free to contact me if you have any questions regarding this letter.

Sincerely,

A handwritten signature in blue ink that reads "Robert E. Johns". The signature is written in a cursive style with a long, sweeping underline.

Robert E. Johns, P.E.
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