



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

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Steve Fort
Modern Welding Co. of Georgia, Inc
PO Box 10067
Augusta, GA 30903-2667

January 13, 2012

Subject: Modern Welding Co, Inc Glasteel II Models GS-13, GS-16 & GS-19 Double-Wall Jacketed Steel Tanks (550 to 50,000 gallons)

Dear Mr. Fort:

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 January 07, 2012. Based on the submitted information, as well as previously submitted interstitial monitoring instructions submitted in April, 2011, 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 #794380-323 or Franklin Fueling TSP-DMS-12 Position-Sensitive sensors are installed in accordance with the Modern Welding Company of Georgia, Inc. “Annular (Interstitial) Space Sensor Positioning” instructions, dated 04-2011. 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.
2. Periodic integrity testing of the tank interstitial space is conducted, in accordance with the “Evaluation of the Glasteel Interstitial Monitor for Liquid Leaks (Tank Models GS-13, GS-16, and GS-19)”, as revised by Ken Wilcox Associates, Inc, December, 2011 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 submitted 01/04/2012 Modern Welding “Periodic Interstitial Test Procedure”, which is based on the aforementioned 12/2011 KWA evaluation. Specific tank sizes and required test times are listed in Table 3 of the 01/04/2012 “Periodic Interstitial Test Procedure”. It is noted that an equation was also included for the determination of testing times for other tank sizes not specifically listed in Table 3. This equation may be used with the following conditions:
 - A. The equation should only be used for tanks between 550 and 50,000 gallons which are not specifically listed in Table 3.
 - B. The specific tank interstitial volume should be determined by the tank manufacturer or design Professional Engineer.
 - C. Calculations and safety factors may be required to be submitted for review.

The aforementioned instructions and procedures should be provided to all customers/contractors that install the subject tanks in North Carolina. Note that the test method did not include tanks containing biodiesel fuels (biodiesel content greater than 20%) or alcohol/gasoline blends greater than 10%, or for tank volumes greater than 50,000 gallons. 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,

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