USING VISTA LEAK DETECTION TECHNOLOGIES TO MEET REGULATORY TESTING REQUIREMENTS

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Vista Research, Inc., offers a comprehensive approach to leak detection and leak location with systems that are accurate and robust, feature quick tests, and are easy to use. In particular, the Vista HT-100 for pipelines and the Vista LRDP for bulk tanks are ideally suited to numerous kinds of facilities that are subject to federal, state and local regulation. This technical memorandum addresses three specific regulations pertaining to bulk tanks and pipelines.

REGULATORY DEFINITIONS

40 CFR 112.8 and 112.11—*EPA regulations that detail the spill prevention activities to be performed by owners/operators of any on-shore or offshore facility, including oil pipeline, oil processing, transferring, and consuming and storage facilities.* EPA interprets this definition to include owners/operators of airport bulk fuel storage tanks and hydrant lines. As originally proposed, SPCC (Spill Prevention, Control and Countermeasures) plans for facilities in operation prior to August 16, 2002, must be amended to address hydrant lines by February 17, 2003, and any spill containment specified in those plans must be built by August 18, 2003. The final rule extends the compliance dates of Sections 112.3(a) and (b) by 18 months, extending the deadlines for planning and implementation to August 17, 2004, and February 18, 2005, respectively. Provisions to meet requirements for initial and periodic testing must be in place at the time any piping is installed, modified, constructed, relocated or replaced.

33 CFR Part 156—*U.S. Coast Guard*—enforced regulations that address the transfer (via pipeline or other means) of oil and hazardous materials to, from and within vessels on navigable U.S. waters. Part 156.170 requires an annual integrity test of the offshore and on-shore portions of these transfer lines. The lines covered by this regulation include barge and ship off-loading and loading lines, and lines from refining, distribution or storage facilities that are located in navigable waters.

49 CFR Part 195—A U.S. Dept. of Transportation regulation that addresses pipelines containing hazardous materials that are located in areas of "high consequence," e.g., environmentally sensitive areas, areas of high population density, and commercially navigable waterways. This regulation specifies that owners/operators of the regulated portions of these pipelines must, among other things, develop integrity management plans, conduct baseline assessments of regulated pipelines.

VISTA SYSTEMS MEET PERFORMANCE STANDARDS

The Vista HT-100 for pipelines and the Vista LRDP for bulk tanks have the necessary performance to meet the regulations described in this technical memorandum, as determined by third-party

¹ The original deadlines stipulated in **40 CFR 112** were amended shortly after the release of Technical Memo No. 60 on 22 November 2003. Revision 1 ("R1") reflects 40 CFR 112's amended deadlines for meeting SPCC rules.

² This second revision (R2) reflects 40 CFR 112's final amended deadlines for meeting SPCC rules.

evaluations. Their suitability for different types of facilities seeking to meet an applicable regulation is shown in the table on the reverse.

Regulatory Requirements That Can Be Met with Vista Leak Detection $\mathsf{Systems}^2$

Type of Facility	Applicable Regulation			
	40 CFR 112.8— Subpart B: On-Shore Tanks & Piping	40 CFR 112.11— Subpart B: Off-Shore Piping	33 CFR 156.170 USCG (2) REGULATED PIPING	49 CFR 195 PIPING IN "HIGH- CONSEQUENCE" AREAS
Refinery	LRDP and HT-100	HT-100	HT-100	HT-100
Petroleum Marketing Terminal	LRDP and HT-100	HT-100	HT-100	HT-100
On-Shore Petroleum Facility	LRDP and HT-100	N/A	N/A	HT-100
Off-Shore Petroleum Facility	N/A	HT-100	HT-100	HT-100
Chemical Company	LRDP and HT-100	HT-100	HT-100	HT-100
Pipeline	LRDP and HT-100	HT-100	HT-100	HT-100
Power Company	LRDP and HT-100	HT-100	HT-100	HT-100
Non-Chemical Manufacturing Company	LRDP and HT-100	HT-100	HT-100	HT-100
Large Airport	LRDP and HT-100	HT-100	HT-100	HT-100
Small Airport	LRDP and HT-100	HT-100	HT-100	HT-100
Aircraft Maintenance Facility	LRDP and HT-100	HT-100	HT-100	HT-100
Shipping Port	LRDP and HT-100	HT-100	HT-100	HT-100

² Consult state and/or local regulatory authorities to confirm that Vista systems are considered appropriate for achieving regulatory compliance within their jurisdictions.

To explore Vista's product line or to obtain background information and technical details about the underlying concepts, visit www.vistaleakdetection.com.