

MICHAEL S. REGAN

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July 6, 2017

Ms. Jacqueline L. Robinson- Finance Director Tank & Pipeworks Ltd. Rear of Kingslodge London Road West Kingsdown Sevenoaks Kent TN15 6AR

Re: Try-Line System for Retrofitting In-Place Single Walled Underground Storage Tanks with a Formed-In-Place Double Walled Fiberglass Tank

Ms. Robinson,

This is in response to your request for review of the above referenced Try-Line System for retrofitting an existing single-walled steel and/or fiberglass underground storage tank with a formed-in-place double-walled fiberglass tank. The North Carolina Department of Environment Quality (NCDEQ) — Underground Storage Tank (UST) Section has reviewed the application, and supplemental information and specifications, which has been provided to NCDEQ.

The Try-Line System is approved for use in North Carolina under the following conditions:

## **General Conditions**

1. Try-Line System is approved for use only with existing FRP tanks or steel tanks not requiring cathodic protection (i.e., steel/jacketed or steel/clad) and installed prior to November 1, 2007. It is <u>not</u> approved for previously lined steel tanks or steel tanks equipped with cathodic protection systems.

2. Each request for Try-Line System installation will be reviewed by the UST Permitting and Inspections Branch of NCDEQ on a case-by-case basis, and must be accompanied by a written letter of explanation for choosing the Try-Line System for the site, a preliminary schedule for installation of the Try-Line System tank(s) and a proposed scope of work.

3. For final approval, the documented findings of a host tank integrity assessment, along with line leak detector testing, sensor operability and functionality test data, tightness testing, etc. are to be submitted as part of the Post-Installation application for review by the UST Permitting and Inspections Branch before the facility operating permit is issued or renewed.

4. The installation of a Try-Line System tank is considered to be a tank repair and does not constitute permanent closure of that UST pursuant to 15A NCAC 02N .0405, .0802 and .0803, nor does it constitute installation of a new double-walled UST pursuant to 15A NCAC 02N .0301 and .0900 and as such will not be considered a new UST per 11/01/2007 rules.

- 5. Prior to the storage of alternative fuels in a Try-Line System tank, supporting information and documentation regarding compatibility with the product being stored must be provided to the UST Permitting and Inspections Branch as part of the installation request.
- 6. Tank Preservation Group, L.L.C., or Tank & Pipeworks, Ltd., must generate and provide tank calibration charts with the Post-Installation application so overfill protection controls can be properly recalibrated. Unless replaced with new components during Try-Line System installation, any and all existing overfill control components must be recalibrated to the volume and dimensions of the Try-Line System tank.
- The Try-Line System tank must be built as a 360° system and shall not be glassed in such a manner as to permit the reuse of the existing tank top and bungs. New bungs, manways and ports for required appurtenances must be formed and installed as part of the Try-Line System tank.
- 8. Appurtenances that are newly installed with the Try-Line System tank, such as spill buckets, containment sumps and overfill protection components, must meet 15A NCAC 2N .0900 standards.

## **Host Tank Specific Conditions**

## Existing Steel/Fiberglass Clad Tanks

The integrity assessment of the host tank must be performed using API 1631 or NLPA 631 standards.

## Existing Fiberglass Tanks

During the integrity assessment of the host tank, a deflection of more than 1% will require consultation with a licensed North Carolina Professional Engineer and/or the host tank manufacturer to determine if the host tank is suitable for repair.

Feel free to contact me if you have any questions concerning this approval.

Sincerely,

Gerald Hornaday Gerald Y. Hornaday, P.E.

Engineer

NC Department of Environmental Quality

Division of Waste Management Underground Storage Tank Section

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Enclosure: Secondary Containment Operation & Maintenance Requirements (12/2011)

Ruth Strauss – UST Section (Raleigh, NC) cc: Matthew Wegner – UST Section (Raleigh, NC) Steve Booe - UST Section (Raleigh, NC) Michael Phelps – UST Section (Winston-Salem Regional Office) File