

Program Letter

Bureau of Petroleum Inspection and Storage Tank Regulation
May 2002

Material Approval Expiration and Leak Detection Methods

Question:

Must use of a leak detection method be discontinued when the Commerce Material Approval required by s. Comm 10.25 expires?

Discussion:

The purpose of a Commerce Material Approval is to verify ch. Comm 10 compliance of a leak detection methodology from a particular manufacturer at the time the equipment is sold. After the leak detection equipment is purchased, the owner has no control over whether the manufacturer renews the Material Approval.

As long as the equipment is not altered and the applicable code requirements for the leak detection method do not change, the leak detection equipment will still maintain code compliance, even after the material approval is expired.

Answer:

A leak detection equipment or methodology may continue to be used in accordance with the approval, even after the approval has expired provided all of the following conditions are met:

- it had a current Material Approval at the time that it was purchased from the manufacturer;
- it is not altered or upgraded;
- the applicable code requirements for the leak detection method do not change .

This is applicable to leak detection equipment that is installed in a system as well as equipment that is moved from site to site, such as precision tightness test equipment used for annual tank or pipeline tightness testing.

Equipment sold or installed by vendors associated with a required material approval that has expired will not be recognized as code complying. However, the department may authorize regulatory acceptance for a specified period if the product is under a review of the renewal application by the department or warranted by other circumstances.