



2/21/2014

TO CONVAULT CUSTOMERS AND SPCC PROFESSIONALS

Subject: Integrity Testing of ConVault Tanks

The current version of the federal Spill Prevention Control and Containment regulations, and specifically 40 CFR 112.8(c)(6), require integrity testing or inspection on a regular schedule¹. ConVault recommends such testing be conducted by ConVault approved inspectors. The testing itself consists of both a detailed visual inspection, records review, and inspection of the area between the inner tank and its liner. ConVault approved testing procedure can be found under the "Technical" tab on this website: www.convault.com.

SPCC professionals sometimes ask why ConVault does not recommend following SP-001. It is correct that ConVault shop fabricated storage tanks have primary inner carbon steel tank that is pressure tested by ConVault prior to shipment to the customer. Once the inner tank is placed within the ConVault system, however, pressure testing may cause serious damage to the ConVault system. Because the SP-001 standard utilizes pressure testing, it is not a recommended methodology for use with ConVault tanks. For this reason, please contact ConVault prior to conducting pressure testing.

If you have any questions regarding ConVault approved integrity testing procedure or need assistance in locating a ConVault approved inspector, please contact us at John.Haggstrom@oldcastle.com and 888-965-3227

Kelly Patterson P.E.

A handwritten signature in black ink, appearing to read 'Kelly Patterson', written over a horizontal line.

Director of Engineering Oldcastle Precast Inc.

¹ This is not a direct quote from 40 CFR 112.8(c)(6); please see the regulation for the text.