

State of Michigan  
Department of Environmental Quality  
Lansing

June 1, 2007

**SUBJECT:** Request for Approval of the Utilization of the Krueger At-A-Glance Leak Gauge (Leak Gauge) as an Interstitial Monitoring Device for Leak Detection for Double-Wall Aboveground Storage Tanks in Michigan

This is in response to your May 16, 2007 letter and supporting documents for the approval of the utilization of the Leak Gauge as an interstitial monitoring device for leak detection for double-wall aboveground storage tanks in Michigan.

Upon review of the third-party evaluation of the Krueger Sentry Gauge Company, Inc. (Krueger), Leak Gauge, by Ken Wilcox Associates, in the Final Report dated April 11, 2007, the technical review engineering staff of the Storage Tank Unit (STU) has recommended the approval of your request contingent upon the following conditions of approval:

1. The Leak Gauge will be installed on double-walled horizontal storage tanks that are provided with and “interstitial tube” (stand pipe) for the monitoring of the interstitial space.
2. The Leak Gauge shall not be installed on any storage tank that has the outer wall in contact with the ground. This requirement includes vertical cylindrical tanks or tanks of any shape that rests directly on grade, or on a concrete slab.
3. Each Leak Gauge must be provided with an audible alarm that is wired to an attended location.
4. Krueger shall train and certify any authorized installer of the Leak Gauge, provide the authorized installers with a copy of this letter, and provide the STU with a list of authorized installers, prior to the installation of any Leak Gauge in Michigan.

The Michigan Department of Environmental Quality (MDEQ) reserves the right to withdraw this approval or to disapprove the utilization of any Leak Gauge if any of the above conditions are not complied with, or if the installation of this gauge is considered by the MDEQ to have any adverse impact on public health, safety, or the environment.

Sincerely,  
Andrea R. Zajac, Chief  
Storage Tank Unit  
Storage Tank and Solid Waste Section  
Waste and Hazardous Materials Division  
517-335-7294