

Annual Testing Requirement for Electronic Line Leak Detectors (ELLDs)

Background:

According to 40 CFR 280.44(a), an annual test of the operation of an automatic line leak detector must be conducted in accordance with the manufacturer's requirements. This requirement is intended to assure that the equipment is properly installed in the line, is not tampered with or being bypassed, and is not broken or otherwise outside of the specification requirements provided by the manufacturer.

EPA interprets this regulation to require that the operation of the leak detector system be tested annually and that the annual test be conducted in accordance with the manufacturer's requirements. This annual testing requirement applies to both mechanical line leak detectors and electronic line leak detectors.

EPA Region 10 Policy:

Therefore, EPA Region 10 requires that the operation of electronic line leak detectors be tested on a yearly basis even if the manufacturer indicates that annual testing of the ELLD is not required.

Further, EPA Region 10 inspectors will be directed to take enforcement action when an owner/operator is unable to document that annual testing of the operation of the ELLD has been conducted.

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