

Title:	Guidance for FFS Evaluation of Hydrostatic Test Exemption	Agenda Item # 653-1014
Date:	08/27/2026	
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Purpose:	Provide guidance and references for the evaluation of hydrostatic test exemption.	
Source:	Task Group on Aboveground Storage Tank Fitness-for-Service	
Revision:	3	
Impact:	- Improve safety by outlining minimum requirements to the storage tank engineer. - Inform tank owner/operator of minimum requirements for the exemption.	
Rationale:	This ballot provides additional guidance in paragraph 12.3.3.7 of API 653 on the evaluation needed to exempt hydrostatic testing. The proposed verbiage is intended to provide guidance to the storage tank engineer to ensure a fitness-for-service assessment is performed per a recognized standard. Additionally, the importance of inspection is highlighted with reference to ASME PCC-2 as a resource (REMOVED). This guidance is analogous to paragraph 5.8.8 "Pressure-testing Alternatives" in API 510. Proposed changes in red font. Latest proposed changes in blue font.	
Proposed verbiage:	12.3.3.7 Fitness-for-Service Evaluation The owner/operator may utilize a fitness-for-service assessment in accordance with API 579-1/ASME FFS-1 or other appropriate evaluation methodology based on established principles and practices to exempt a repair or alteration from hydrostatic testing. All appropriate assessments (e.g., brittle fracture, ductile failure, pin-hole leaks) shall be considered as determined by the storage tank engineer. Appropriate NDE shall be specified by the storage tank engineer and conducted when a hydrostatic test is not performed after a major repair or major alteration. If it is determined the material has insignificant toughness, a fracture mechanics assessment shall be performed to determine critical flaw sizes to compare to detection capability of NDE techniques. Refer to ASME PCC-2 for guidance on NDE in lieu of pressure testing for repairs and alterations. The procedures and acceptance criteria for conducting an evaluation alternative analysis are not included in this standard. This evaluation shall be performed by an engineer experienced in storage tank design and the evaluation methodologies used.	