

Draft Summary of Comments to DEP Draft Technical Guidance 263-0900-011
Storage Tank Modification and Maintenance Issues

This is a list of corporations, organizations and interested individuals from whom the PA DEP, Division of Storage Tanks, has received comments regarding the above referenced draft technical guidance document.

ID	Name and Address
1.	J. Stephen Hieber PWI, Incorporated New Oxford, PA 17350
2.	Frank J. DiDonato PA DEP Certified Individual
3.	Scott Hafer, President Hafer Equipment Reading, PA. 19606
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6.	Brian Dubas, Vice-President Pine Run Construction Doylestown, PA 18902
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General Comments

1. **Comment:** The activity and experience requirements as currently stated in regulation that serve as prerequisites for individuals seeking initial UMX certification should be modified. Suggest that a certified manufacturer provide training for the current tank installation requirement. The individual would then need to be involved with nine tank handling activities over a 1-year period. Current prerequisites require an individual be involved with nine tank installations over a 3-year period. There are not enough tank installations being performed to meet this requirement. By making this change, certified companies would be able to increase the number of employees with UMX certification and would avoid PA DEP from creating any additional certification categories. (2)

2. **Comment:** The listed examples of activities should be numbered rather than bulleted to make it easier to review within the document. (3)

3. **Comment:** In order to assist the PA DEP with allowing activities such as automatic tank gauge console replacement and line leak detector installation to be performed by a technician holding current certification from the manufacturer rather than a PA DEP certified installer, allow the PA DEP certified company representative to submit the PA DEP Modification Report in place of a PA DEP certified individual. (3)

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Minor Modification Activities: Underground Storage Tank Systems

4. **Comment:** Bullet #1 states “Staking and placing of concrete forms, and/or pouring concrete, over the tank field and piping runs.” Staking and placing forms prior to the actual pouring of concrete is the critical portion of this activity. Pouring concrete once the forms are set presents no danger to the tanks and piping and can be done by an uncertified person. The phrase “pouring concrete” should be removed. (3) (4) (5) (6) (7)

5. **Comment:** Bullet #5 states “Replacement or removal of leak detector/pump-manifold (packer) assembly.” Replacement of a leak detector can be performed by an uncertified service technician. There seems to be confusion regarding the packer assembly and the manifold. The packer assembly is the extractable part of a submersible pump; the manifold is the portion that is threaded onto the four (4) inch riser. Removal and replacement of the packer assembly is a normal maintenance function in the replacement of a sub pump motor. Submersible turbine pump (STP) manifold is the proper nomenclature and should be performed by a certified installer. The phrase “leak detector/pump-manifold (packer)” should be replaced with “submersible pump manifold.” (1) (3) (4) (5) (6)

6. **Comment:** Bullet #6 states “Replacement, removal or disconnection of piping connectors.” The term piping connectors is considered too vague. I am not sure what this means in relation to the fueling systems piping. Is this a pipe coupling or perhaps a pipe union? Clarification on the term “piping connectors” is requested. (3)

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7. **Comment:** Bullet #7 states “Replacement, removal or disconnection of break-away (shear) valves.” The usage of the term “break-away” is incorrect as it is understood in the industry. Replace the term “break-away” with “impact” or “emergency” valve. A breakaway device is part of the hanging hardware. The requirement for a certified individual should only be for a complete valve replacement. Replacement of an emergency valve top should be considered a maintenance activity. (1) (3) (4) (5) (6) (7)

8. **Comment:** Bullet #12 states “Initial installation of a line leak detector.” The initial installation of a line leak detector should not require UMX certification but should only be performed by a technician holding current certification from the manufacturer. (1)

9. **Comment:** Bullet #13 states “Changing the type of line leak detector, such as mechanical to electronic.” Changing the type of line leak detector from mechanical to electronic, for example, is frequently performed by a non-certified but manufacturer trained technician. The activity should not require UMX certification. The activity should be allowed to be performed by a technician who is trained and certified by the manufacturer and the activity documented with submission of a Modification Report. (1) (3) (4) (5) (6)

10. **Comment:** Bullet #15 states “Installation, repair or replacement of spill containment devices, including the installation or replacement of drain valves or plugs.” Clarification should be made that replacement of spill containment devices, including drain valves or plugs, that requires excavation, is a major modification. (3) (4) (5) (6) (7)

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11. **Comment:** Bullet #16 states “Initial installation or complete replacement of an automatic tank gauging system, or the replacement of an automatic tank gauge console.” The initial installation or replacement of an automatic tank gauging system and the installation or replacement of an automatic tank gauge console is frequently performed by non-certified individuals who have been trained and certified by the manufacturer. The activity should be allowed to be performed by a technician who is trained and certified by the manufacturer and the activity documented with submission of a Modification Report to the PA DEP. (3) (4) (5) (6)

12. **Comment:** Bullet #16 states “Initial installation or complete replacement of an automatic tank gauging system, or the replacement of an automatic tank gauge console.” The last portion “or the replacement of an automatic tank gauge console” should be deleted. The replacement of an automatic tank gauge console should not require UMX certification. The activity, however, should be performed by a technician holding current certification from the manufacturer. (1)

Maintenance Activities: Aboveground and Underground Storage Tank Systems

13. **Comment:** Bullet #8 states “Replacement or repair of the tank pump or submersible turbine (with extractable column) if accessible through the manhole or tank riser sump (not involving removal or disconnect of packer manifold assembly or piping below the ground or grade surface).” Proper nomenclature should be used regarding the phrase “packer manifold assembly.” The term “packer” should either be deleted or replaced with the term “discharge.” (1)

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14. **Comment:** Bullet #9 states “Repair of line leak detectors and repair or replacement of metering devices (with like kind devices) when accessible from aboveground or through manholes.” Line leak detectors generally cannot be repaired. Add the term “replacement” regarding line leak detectors so that all line leak detectors be repaired or replaced by a manufacturer certified technician. (1) (3) (4) (5) (6)

15. **Comment:** Bullet #10 states “Changing or replacing product dispenser components above the break-away (shear) valve (not involving piping disconnect at the valve).” The usage of the term “break-away” is incorrect as it is understood in the industry. Replace the term “break-away” with “impact” or “emergency” valve. Clarification is requested regarding product piping disconnect below the impact valve, which would require the use of a certified individual. Piping above the impact valve may have to be disconnected to replace dispenser components which can be performed by an uncertified service technician. (1) (3) (4) (5) (6)

16. **Comment:** Bullet #11 states “The decommissioning of a Stage II vapor-recovery system not involving excavation or tank handling activity, such as the replacement or removal of product dispensers, or the replacement, removal or disconnection of product piping, piping connectors or break-away (shear) valves.” Replacement, removal or disconnection of vapor piping during the decommission process of stage II vapor recovery piping should be considered a tank handling activity and should be performed under the direct onsite supervision of a certified installer. The usage of the term “break-away” is incorrect as it is

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understood in the industry. Replace the term “break-away” with “impact” or “emergency” valve. (3) (4) (5) (6) (7)

17. **Comment:** Bullet #17 states “Installing temporary leak clamps.” Temporary leak clamps should never be used. Eliminate this item from the list. (3) (4) (5) (6) (7)