Pennsylvania Department of Environmental Protection
Division of Storage Tanks
December 9, 2008

IMPORTANT NOTICE
Regarding Replacement of Pipe Extracted Through a Chase Pipe

The Department continues to see deterioration of older Total Containment piping that necessitates its replacement. This is normally a 100% replacement of the underground piping that routinely contains and conveys product. Regulations that became effective November 10, 2007, require the new piping to be double wall, that sumps be installed (current ones or new) at both ends and any transitions, and the sumps be tested and shown to be liquid tight. For pressurized systems, a pump shut off must be incorporated into the line leak detector function.

Meeting the requirements is complicated by older chase pipe. This pipe is not UL listed and does not meet the regulatory requirements of secondary containment. This necessitates a true double wall pipe, with UL listing, be used for the new run. The chase may remain in place to facilitate pipe maintenance, but cannot be used for release detection.

Testing the sumps is another issue with this type of installation. Ordinarily, pulling a primary pipe out of the chase and pulling in a new flexible pipe is a minor modification. Sealing the chase pipe to allow testing of the sumps may turn this into a major modification.

One certified company suggested using a special sealing compound to deal the space between the new double-wall pipe and the chase. To the Department's knowledge there is no industry standard that allows this type of repair and no manufacturer that provides such a compound. Before attempting to seal the sump in this manner, contact the appropriate regional office and provide the applicable industry standard, and compound manufacturer's information and recommendations.

The Department currently recognizes 2 methods of meeting the testing requirements:

1. Install a boot at the sump penetration that allows the chase to be sealed off for sump testing. In some instances this may require excavation and is a major modification.
2. In lieu of performing a hydrostatic, vacuum or similar test of the sumps, install interstitial sensors at each sump that are continuously monitored by an ATG or similar console.

In order to prevent future generations of leaking underground storage tank systems, correct interpretation of the regulations is important. If you have questions or desire clarification of the above, please contact the Division of Storage Tanks at (717) 772-5599 and ask to speak with a member of the Underground Storage Tank Unit.