

Pennsylvania Department of Environmental Protection
Division of Storage Tanks
March 24, 2011

IMPORTANT NOTICE

**Release Detection Requirements
For New Suction System Piping**

On November 10, 2007, amendments to 25 Pa. Code Chapter 245, Administration of the Storage Tank and Spill Prevention Program, became effective. One of the amendments requires that whenever more than 50% of the existing piping that routinely contains and conveys product from the tank is replaced, the entire piping system that routinely contains and conveys product from the tank shall be replaced meeting the requirements for new piping systems. The requirements for new piping systems include:

1. Double-walled piping.
2. Containment sumps at both ends of the piping runs.
3. Containment sumps at any piping transitions.
4. Interstitial monitoring as at least one form of piping release detection. Additionally, pressurized systems must incorporate pump shut off into the line leak detector function.

As indicated above, owners and operators of new piping systems installed after November 10, 2007, must perform interstitial monitoring at least once every 30 days. The requirement for interstitial monitoring as a form of release detection includes suction piping systems, both American and European types, installed after November 10, 2007. One common example where some confusion could occur would include a complete replacement of a drone tank's siphon piping. If more than 50% of the siphon piping is replaced, the requirements for new piping systems would need to be met, including interstitial monitoring of the siphon piping.

Owners and operators, in order to maintain compliance, must perform some form of interstitial monitoring on new suction piping systems. Monitoring shall be accomplished by one of the following methods:

1. Monthly visual check and log of sump conditions.
2. Monthly check of sumps through the use of electronic sensors.

European or safe suction systems installed on or before November 10, 2007, continue to be deferred from piping release detection requirements.

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.