Pennsylvania Department of Environmental Protection Division of Storage Tanks

March 24, 2011

IMPORTANT NOTICE

Regarding Replacement of Pipe Extracted Through a Chase Pipe

The Department continues to see deterioration of flexible piping systems 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 that whenever more than 50% of the existing piping that routinely contains and convey 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 the installation of new piping systems include: double-walled piping, containment sumps at both ends of the piping runs, containment sumps at any piping transitions, and 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.

Although the Department considers the replacement of primary product piping through a chase pipe (without excavation) a minor modification activity and not a closure activity, it is still a replacement of more than 50% of the existing product piping and would trigger the requirements for new piping systems, including pump shut off.

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.