

**Pennsylvania Department of Environmental Protection**  
**Division of Storage Tanks**  
June 27, 2023

**IMPORTANT NOTICE**

**Emergency Generator Set System Product Piping**

The Storage Tank Regulations require AST systems and associated ancillary equipment, including product piping, to be designed, installed, and modified in accordance with current standards and codes of practice developed by Nationally-recognized associations.

Two current standards that cover the design and installation of emergency generator systems, including emergency generator set (“Genset”) systems, are NFPA 37 and PEI/RP1400. Both of these standards prohibit the use of low melting-point materials, such as rubber hoses, in the product piping system. For a Genset system to comply with NFPA 37 or PEI/RP1400, the product piping within that system should be constructed of steel or other metal. When the product piping falls under the scope of a standard or listing other than NFPA 37 or PEI/RP1400, the requirements of that other standard or listing may be applied (e.g. an industry listing for the entire Genset system).

The standards of performance for certified companies and certified individuals found in Section 245.132(a)(8) require them to adhere to industry standards and codes of practice when performing tank handling **and** nontank handling activities on a project involving a regulated storage tank system. Section 245.132(c)(2) of the standards of performance go on to say that a certified company or certified individual may not certify that a storage tank system project is complete unless it complies with the Storage Tank Regulations, and specifies that, “Project certification applies to certified activities **and** nontank handling activities that may have been performed as part of the project.”

By signing the Storage Tanks Registration/Permitting Application Form, the DEP-certified installer is certifying that the activity is complete, the tank system meets DEP requirements under Chapter 245, and the tank system is ready to operate. Submission of signed registration paperwork for an AST system with product piping that does not meet the requirements of a current, applicable industry standard or code of practice, is a violation of Section 245.132, and is subject to enforcement action by DEP. Because the above citations from Chapter 245 apply to both tank handling and nontank handling activities on a project, all product piping associated with a Genset system should meet a current, applicable industry standard or code of practice, regardless of its position in relation to the tank’s emergency containment.

In order to prevent contamination of environmental media by releases from aboveground storage tanks, it is important to correctly interpret the regulations. 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 Aboveground Storage Tank Section.