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SECONDARY CONTAINMENT REQUIREMENTS FOR ABOVE GROUND WELDED FLANGES AND SEALLESS VALVES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 23 1987

Ms. Wendy S. Goerss
Environmental Engineer
SSOE, Inc.
1001 Madison Ave.
Toledo, Ohio 43624

Dear Ms. Goerss:

This letter is in response to your letter of September 2, 1987, requesting confirmation of 40 FR 264.193 interpretations given to you by me in recent telephone conversations. Specifically, our discussions centered on the applicability of EPA's requirement for secondary containment of aboveground welded flanges and the scope of the germ "welded flange". You likewise inquired of the applicability of secondary containment for aboveground sealless valves.

As I pointed out in our telephone conversations, one of EPA's primary concerns with aboveground piping is the threaded connection. As such, the Agency's intent is that secondary containment be provided at these type connections. An exemption from secondary containment is allowed for welded piping connections due to EPA's belief that the threat of a release from these locations will be substantially lower than for a threaded connection. Of course, EPA realizes that even aboveground welded connections are not completely leak-proof and will need to be inspected on at least a daily basis and properly maintained.

EPA has been asked by numerous parties of concern to define the scope of meaning of the term "welded flange". A clarification of this term is being prepared and should be published in the near future in the Federal Register. Although I cannot send you a copy of the draft upcoming FR notice, I can comment on EPA's intended clarification regarding the types of flanges that you referred to in an attachment to your letter taken from Perry's Chemical Engineer's Handbook, Fifth edition. Your assessment of the applicabil-

ity of secondary containment to the five pictured flanges is correct. The other four flange types (slip-on, socket, lap joint, and welded neck) will be viewed as falling within the intent of EPA's definition of welded flange and thus would not require secondary containment.

The Agency also believes that aboveground sealless valves that are visually inspected on a daily basis should be exempt from the secondary containment requirements. EPA alluded to this in the preamble to the July 14, 1986 FR (51 FR25450) but, due to an oversight failed to include this term in the §§264.193(f) and 265.193(f) regulatory language. We place to likewise make this correction in the above-mentioned upcoming FR notice. The Agency does not, however, intend to define "sealless vales" specifically. Given the wide and ever changing array of valves available on the market, EPA believes it would be impractical to define the meaning of this term. Instead, the Agency would rather allow that a determination of whether or not a valve is "sealless" be made on a case by case basis by Regional/state permitting authorities, keeping in mind that the intent of the exemption is to encourage the use of valves that employ a design that strictly minimizes valve stem leakage, particularly in comparison to valves using traditional packings. As an example of this type of valve, EPA is aware of a valve that uses a welded metal bellows to seal the valve stem. This or other valve designs that essentially achieve containment within the valve body would meet EPA's meaning of a sealless valve.

I hope that I have adequately addressed your questions. Please call me at (202) 382-7917 if you have any questions.

Sincerely,

William J. Kline
Environmental Scientist

cc: Chet Oszman, PSPD