

PPC 9483.1986(02)

SEALED BELLOW VALVES USED IN LIEU OF SECONDARY
CONTAINMENT FOR GLOBE VALVES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 27 1986

Mr. Greg R. Haskins
Bechtel National Inc.
P.O. Box 3965
San Francisco, California 94119

Dear Mr. Haskins:

This response is to your letter of August 11, 1986, requesting EPA's opinion on whether sealed bellow valves could be used in lieu of providing conventional containment around standard globe valves. As noted by EPA in both the proposed and final rulemaking of revised hazardous waste tank system standards, failure of components (including valves) in piping systems, accounted for a significant portion of the releases from tank systems. Thus, EPA is requiring that secondary containment be provided for these more vulnerable components, except, for example, when welded flanges, sealless valves, sealless pumps, etc. are employed.

We have reviewed the sales literature that you submitted with your letter describing the sealed bellow valves you propose to use. It seems that these valves, as described, would meet EPA's intent to eliminate the causes of failure commonly associated with valves that use packing or o-rings. Thus, a conventional external means of secondary containment would not be necessary. Likewise, as suggested in your letter, the use of this type of valve should allow daily visual inspections and would not necessitate a separate leak detection device.

Because EPA has found that connections made using pipe thread or gasket type seals are also susceptible to failure, we would require that all connections and flanges used in conjunction with valves, including valves of this type, be welded to ensure leak free operation.

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