

9483.1987(14)

PRESSURIZED PIPING SYSTEMS WITH AUTOMATIC SHUT-OFF DEVICES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG -3 1987

Mr. Timothy P. Love
Allied Corporation
Fibers Division
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Philadelphia, PA. 19137-1193

Dear Mr. Love:

This letter is in response to your letter of February 19, 1987, requesting confirmation of a telephone conversation on February 9, 1987, between you and Bill Kline of my staff. The topic of that telephone conversation was the intent of §265.193(f)(4) regarding whether secondary containment is required for pressurized aboveground piping systems that are provided with automatic shut-off devices.

As was discussed in the telephone conversation, I can confirm that the §265.193(f)(4) provision, as now written, would exempt pressurized piping systems with automatic shut-off devices from the secondary containment requirement. Furthermore, this provision would allow this exemption even if welded flanges, welded joints, welded connections, sealless valves, and sealless or magnetic coupling pumps are not used.

The Agency has been reconsidering the ramifications of this provision, as currently written. EPA may have over-estimated the effectiveness of automatic shut-off devices. Although these devices should certainly limit the quantity of waste released in case of a substantial failure somewhere in the piping system (e.g., pipe rupture), they would unlikely have any effect on reducing the number or size of releases in piping systems due to small or slow leaks at valves, connections, flanges, etc.

It was not EPA's intent to prescribe less importance to smaller than major leaks in pressurized piping systems. In fact, such less than major leaks would be of greater concern in pressurized piping systems compared to non-pressurized systems

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due to their potential to release larger quantities of hazardous waste.

Thus, the Agency believes that it may be prudent to require all aboveground piping systems, pressurized as well as non-pressurized, even if automatic shut-off devices are used, to use welded joints sealless valves, sealless or magnetic coupling pumps, etc., in order to be exempted from the secondary containment requirement. In fact, we are contemplating that automatic shut-off devices should likewise be welded so as not to be a source of leakage. Using this approach, automatic shut-off devices might, rather than serve as a means for a piping system to be exempted from secondary containment, would be used to protect against catastrophic releases and serve as a means to limit the size of the secondary containment system(s), where needed. EPA is considering proposing such an amendment to the tank system standards.

We appreciate your comments on this issue. Please accept our apology for any inconveniences caused by our delayed response. If you have any further questions, please contact Bill Kline or Bob April at (202) 382-7917.

Sincerely,

Robert W. Dellinger
Chief, Waste Treatment Branch

cc: Regional Hazardous
Waste Branch Chiefs
Chet Oszman, PSPD

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