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SECONDARY CONTAINMENT FOR PIPING SYSTEMS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JULY -9 1987

Mr. Irving D. Press
Vice President-Technology
Resistoflex Company
Woodland Road
Roseland, New Jersey 07068

Dear Mr. Press:

This letter is in response to your letter of June 16, 1987, in which you expressed concern with EPA's regulations and subsequent interpretation regarding secondary containment of piping systems.

EPA appreciates your concern and is likewise aware of the problems associated with piping systems. As appropriately pointed out in your letter, the piping is one of the most vulnerable areas of a tank system and needs to be given careful and special consideration during its design, installation, and operation. You also correctly stated the Agency's determination that secondary containment with leak detection provides the most reliable means of preventing releases to the environment.

For underground piping, EPA believes that secondary containment with leak detection is an absolute necessity. Not only is underground piping more prone to failure due to corrosion and other soil related stresses, than is aboveground piping, but it is also impossible to visually observe any impending or actual failure of the piping system, particularly for less than catastrophic releases.

On the other hand, EPA believes that with aboveground piping, where corrosion related failure is minimized, visual inspections performed daily will enable the owner/operator to promptly remedy observed impending or actual failure. Furthermore, for any release that does occur from an aboveground piping system, the response actions required by the regulations should prevent, in all but the most unusual circumstances, any contamination of ground water or surface water. It is EPA's opinion that the

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risks associated with aboveground piping do not justify the necessity of providing secondary containment for the entire

aboveground piping systems. However, the Agency is requiring that secondary containment be provided where threaded connections, packing-type pump seals, and other equipment with greater risk of failure is used.

The revised hazardous waste tank system standards place an emphasis on proper design and installation of the piping system, daily inspections of equipment, and the requirement of secondary containment for all underground piping and for the more failure prone areas of aboveground piping systems. Given this focus, EPA believes that its revised standards for piping and other ancillary equipment will be protective of the environment. Thus, the Agency has no intention of amending §§264.193 or 265.193 to eliminate paragraph (f). A Federal Register notice to clarify certain terms in paragraph (f) is, however, being prepared. For example, the term "welded flange" will be clarified as meaning a flange that is joined to the pipe by some type of welded connection. EPA will not interpret "welded flange" as being the sealing of assembled flange joints. The notice is expected to be published this summer.

If you should have any further questions, or wish to further discuss your concerns, please contact Bill Kline or Bob April of my staff at (202) 382-7917.

Sincerely,

Robert W. Dellinger
Chief, Waste Treatment Branch

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