



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 19, 2018

OFFICE OF
LAND AND EMERGENCY
MANAGEMENT

MEMORANDUM

SUBJECT: Integrity testing for under dispenser containment sumps having single-wall piping

FROM: Tony Raia, Director
Release Prevention Division
Office of Underground Storage Tanks

TO: Mike Hastry, Director
Division of Waste Enforcement, Pesticides, and Release Prevention
New Jersey Department of Environmental Protection (NJDEP)

We are responding to NJDEP's request for written clarification regarding the requirements for integrity testing of under dispenser containment sumps (UDC), when single-wall piping is present in the UDC. The 2015 federal underground storage tank (UST) regulation at 40 CFR 280.35 requires all containment sumps used for interstitial monitoring of piping be tested once every three years to ensure the equipment is liquid tight, unless the sump is double walled and integrity of both walls is periodically monitored at a frequency not less than the frequency of the walkthrough inspections in 280.36.

EPA answered and posted the question and answer copied below in March, 2017 in a technical compendium about the 2015 federal UST regulation, which is available on the EPA website. The address is: <https://www.epa.gov/ust/underground-storage-tank-ust-technical-compendium-about-2015-ust-regulations#secondarycontainment>. This compendium contains EPA's interpretations and guidance about the 2015 underground storage tank regulations. In the answer, EPA states: *EPA considers the UDC as secondary containment for the single-wall piping, including the single-walled flex connector, beneath the shear valve. According to 40 CFR 280.43(g), owners must monitor the UDC by interstitial monitoring as the primary method of release detection.*

All piping that routinely contains product in an UST system must have release detection, including single wall piping of any length in a UDC. Single walled piping in the UDC uses the UDC as secondary containment and interstitial monitoring of the UDC to meet the release detection requirement. Therefore, because the UDC is used for interstitial monitoring of the piping, the owner or operator must test the integrity of that UDC at least once every three years to ensure it is liquid tight.

If you have any questions about this response, please contact me at (202) 566-1021 or Ryan Haerer at (202) 564-0762.

Containment Sump – Testing for Systems with Single-Walled Piping

Question: Suppose there is single-walled piping in a UDC sump leading up to the dispenser, below the shear valve, and the single-walled piping is connected by single-walled flex connector to double-walled piping.

Does the single-walled piping have to meet the secondary containment and interstitial monitoring requirement?

Does the UDC have to meet the 3-year testing requirement? (*Added: March 2017*)

Answer: Yes, to both questions. According to the 2015 federal UST regulations, all piping installed or replaced after April 11, 2016 must meet the secondary containment and interstitial monitoring requirement. EPA considers the UDC as secondary containment for the single-walled piping, including the single-walled flex connector, beneath the shear valve. According to 40 CFR 280.43(g), owners must monitor the UDC by interstitial monitoring as the primary method of release detection.

In this case, the UDC is part of the secondary containment and interstitial monitoring for the single-walled piping; it must be tested once every 3 years or be double-walled with periodic monitoring of the space between the walls.

Note that most states have already implemented their own requirements for secondary containment and UDC. The 2015 federal UST regulations primarily apply to owners and operators in Indian country.
