

**TO** Certified Tank Handling Companies

**FROM** Kris A. Shiffer  
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Bureau of Environmental Cleanup and Brownfields

**DATE** April 2, 2020

**RE** Tank Inspections and Installations During COVID-19 Response

On March 19, 2020, Governor Tom Wolf ordered that no person or entity shall operate a place of business in the Commonwealth that is not a life-sustaining business. Life-sustaining businesses may remain open, but they must follow, at a minimum, the social distancing practices and other mitigation measures defined by the Centers for Disease Control and Prevention to protect workers and patrons. A list of life-sustaining businesses that may remain open can be found at <https://www.governor.pa.gov>.

DEP-certified tank handling companies employing certified inspectors and installers play a critical role in the manufacture and supply of goods and services necessary to sustain life. Failure of storage tank systems and storage tank components to remain in a good state of repair and function as designed could contribute to a release of product. After receiving additional clarification and until further notice, inspection, upgrade, repair and testing activities that are performed by DEP-certified tank handling companies may continue. Third-party inspection activities required by storage tank regulations to identify storage tank system and component failures may also continue.

Installation of storage tank systems at life-sustaining businesses by DEP-certified tank handling companies may continue. Removal of storage tank systems should be limited in scope where removal is necessary for subsequent tank installation or to protect human health and the environment. Please note that any in-person work at a business site is only to be performed on the most limited basis possible to deliver the services or goods.

DEP would also like to remind our storage tank community that all of 25 Pa. Code, Chapter 245 requirements remain in effect. This includes, but is not limited, to the following:

- All storage tank and piping release detection, monitoring, and cathodic protection equipment should remain on, properly functioning, and continue to be monitored. In addition, leak detection alarms and suspected releases should be responded to by owners and operators appropriately. While releases to the environment are infrequent, a release from a storage tank or storage tank facility can become both costly and dangerous;
- All third-party inspections, third-party testing and monthly walkthrough inspections should continue as required.

This situation remains fluid and DEP will continue to advise the storage tank community as circumstances or situations change. Any updates will be posted on the DEP Storage Tanks website at <https://www.dep.pa.gov/Business/Land/Tanks/Pages/default.aspx>. If you have any questions or require further clarification, please contact the Division of Storage Tanks at [tanks@pa.gov](mailto:tanks@pa.gov).