

909 Elmerton Avenue
Harrisburg, PA 17110
December 20, 2007

IMPORTANT NOTICE REGARDING INTERSTITIAL MONITORING FOR PIPING RELEASE DETECTION

Whenever performing an Underground Facility Operations Inspection, it is important to remember the requirements for methods of piping release detection as described in Section 245.445. These requirements, in particular, require an annual test of the operation of the line leak detector conducted in accordance with the manufacturer's requirements. A line leak detector is considered a device that alerts the operator to the presence of a leak by restricting or shutting off the flow of regulated substances through piping or triggering an audible or visual alarm. Whenever a regulated facility uses interstitial monitoring with sensors to meet this requirement, the sensors are required to have an annual functionality test. When reviewing a facility's piping release detection records, it is important to determine if an annual functionality test has been performed. If the facility does not have an annual functionality test of the sensors, the facility should be marked as noncompliant for piping release detection.

In addition, if the regulated facility is a remote site and considered "unmanned", a method of piping release detection that restricts or shuts off the flow of product should be in place. Simply having an audible alarm at this type of facility is not acceptable as a compliant method of piping release detection.

Please note: Underground storage tank systems, including underground pressurized piping, installed or replaced after November 10, 2007, must have line leak detectors with an automatic pump shut-off device that shuts off the flow of regulated substances through pressurized piping that routinely contains and conveys product from the tank

If you have any questions or desire any clarification of the above, please contact the Southcentral Regional Office at (717) 705-4705 and ask to speak with a member of the storage tank program.