

Pennsylvania Department of Environmental Protection
Division of Storage Tanks
August 2, 2019

IMPORTANT NOTICE

Double-Walled ASTs with Uncontained Tank Shell Penetrations Below the Maximum Product Level

Small aboveground storage tanks (ASTs) must be installed with both secondary containment to allow a release from an AST to be detected before it enters the environment and emergency containment to contain any possible release from the tank system. Small double-walled ASTs may meet both secondary and emergency containment using the secondary tank, if operated with the spill and overfill protection controls described in 25 Pa. Code, §245.612(d).

During routine inspections, inspectors may encounter small double-walled ASTs with tank shell penetrations, such as manways and blinded nozzles, below the maximum product level. Section 245.612(d) states that, “Tanks shall be installed with [...] emergency containment to contain possible releases, such as overfills, leaks and spills.” The tank shell penetrations described above are not contained within the secondary tank. A release from these single-walled portions of the AST system would not be contained and would impact environmental media.

A double-walled small AST with an uncontained tank shell penetration below the maximum product level will not meet the emergency containment requirements using the secondary tank, and it will need additional emergency containment structures or equipment to satisfy the requirements of §245.612(d).

In order to prevent contamination of environmental media by releases from aboveground storage tanks, correct interpretation of the regulations and evaluation of containment structures is important. If you have questions or desire clarification of the above, please contact the Division of Storage Tanks at (717) 772-5599 and ask to speak with a member of the Aboveground Storage Tank Unit.