

Pennsylvania Department of Environmental Protection
Division of Storage Tanks
February 24, 2021

**IMPORTANT NOTICE: PARTIAL RESCISSION OF
PREVIOUSLY ISSUED TECHNICAL BULLETIN**

**Regarding Replacement of Pipe
Extracted Through a Chase Pipe**

Effective immediately, this Notice rescinds in part the March 24, 2011, Notice titled “Regarding Replacement of Pipe Extracted Through a Chase Pipe”.

In the March 24, 2011 Technical Bulletin, the Pennsylvania Department of Environmental Protection (DEP) incorrectly stated that the replacement of primary product piping through a chase pipe (without excavation) was considered a minor modification activity and not a closure activity. DEP hereby rescinds that statement.

A correct reading of 25 Pa. Code Chapter 245, Administration of the Storage Tank and Spill Prevention Program, offers the following explanation for this rescission:

Section 245.452, relating to permanent closure and changes-in-service, states in part, “Replacement...of underground product piping...shall be considered a permanent closure”.

Section 245.1, relating to definitions, defines “Removal from service” as including “permanent closure”.

The appropriate certification for “removal from service” is the Underground Storage Tank System Removal (UMR) certification.

Therefore, when primary product piping, which is considered underground product piping even installed in a chase pipe, is replaced, by regulation it is a permanent closure of the underground product piping requiring the direct onsite supervision of a UMR Certified Individual. Product piping being installed must continue to meet new piping requirements and requires the direct onsite supervision of a UMX Certified Individual. Please see Sections 245.441 and 245.442 for new piping requirements. A site assessment is required; however, actual collection of samples may not be always necessary. For site assessment questions, please contact the appropriate DEP Regional Office for guidance.

In order to prevent future generations of leaking underground storage tank systems, correct interpretation of the regulations 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 Underground Storage Tank Unit.