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west virginia department of environmental protection

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## SECONDARY CONTAINMENT GUIDANCE DOCUMENT

Since July 1, 2008, new or replaced underground storage tank (UST) systems, including USTs used for emergency power generation, have been required to meet secondary containment criteria. These new requirements have resulted in inquiries regarding their application. This guidance is provided in response to these inquiries in an effort to assist in complying with the new requirements:

- 1) New underground tanks and/or piping must meet requirements for secondary containment.
- 2) Replaced underground tanks and/or piping must meet requirements for secondary containment. Replaced piping must meet requirements for secondary containment depending on the amount of piping replaced.
- 3) Replaced piping - Replace means to remove and put back any amount of piping connected to an UST system. The secondary containment requirements for replaced piping is triggered when a minimum of 50% or 20 feet (whichever is less) of the total length of piping connected to a single underground tank is replaced. The total length of piping connected to a single underground tank includes the piping from that tank to the farthest connected dispenser, including piping runs between dispensers connected to that tank.
- 4) Secondary containment requirements shall apply to the specific UST tank and/or piping being replaced and not to other USTs.
- 5) The secondary containment system must be designed, constructed, and installed to:
  - a) Contain regulated substances released from the tank system until they are detected and removed.
  - b) Prevent the release of regulated substances to the environment at any time during the operational life of the UST system.
  - c) Be checked for evidence of a release at least every 30 days. This must be done by either a visual inspection of all sumps or a sump monitoring system **that will** detect a release from the UST system within 30 days. Monitoring records must be kept as part of the requirements of 280.45.

**NOTE:** In order to verify that the secondary containment system meets these criteria, testing of system sumps and interstices will be required at installation and every three

years thereafter. In addition, interstitial monitoring must meet the requirements of 40 CFR 280.43(g).

Where existing piping is replaced and existing sumps are reused, the system is considered to be a replaced piping system and must meet the secondary containment requirements noted above.

The above requirements do not apply to suction piping that meets the requirements of 40CFR 280.41(b)(2)(i)-(v) or to piping that manifolds two or more underground tanks together.

**Requirements for New or Replaced Motor Fuel Dispenser Systems – new or replaced motor fuel dispenser systems must have under-dispenser containment. The motor fuel dispenser system includes the dispenser and equipment necessary to connect it to the UST system, including check valves, shear valves, unburied risers, flexible connectors, or other transitional components. The secondary containment for dispenser systems must:**

- 1) Be liquid-tight on its sides, bottom, and at any penetration.
- 2) Be compatible with the substance conveyed by the piping.
- 3) Allow for the visual inspection and access to the components in the containment system, be monitored, or both. Such monitoring must meet the same standards as noted for interstitial monitoring in item 5c above.
- 4) Be liquid-tightness tested at installation and every three years thereafter.

**NOTE: If the dispenser only, the shear valve only, or the dispenser and shear valve only are replaced, and no additional connected dispenser system components are replaced, the new equipment installation does not meet the definition of replacement of the motor fuel dispenser system for the purposes of this section.**

#### **Exclusions for Compliance with Secondary Containment Requirements:**

WVDEP reserves the right to allow repairs to the UST system when no release to the environment has occurred, and where 100% or less of piping, excluding connectors, is removed and put back in. On a case-by-case basis, WVDEP will deem the UST system to meet the definition of “repair” where existing components have been demonstrated to be out of operating condition and/or where it is determined they pose an imminent threat to human health and the environment. **WVDEP will approve repairs to the UST system when no release to the environment has occurred only when prior written approval from the WVDEP has been provided to the UST system owner/operator.**

Additional guidance regarding UST system notification requirements for closure, upgrade, and installation, and requirements for testing of UST systems can be found in the following references:

Installation/Upgrade Request Form – UST 19  
Permanent Petroleum Tank Closure Memo