Tennessee Department of Environment and Conservation
Division of Underground Storage Tanks
Office of the Director

MEMORANDUM

DATE: April 4, 2013 (Reissue of RIM dated November 26, 2001)

TO: All UST Division Staff

FROM: Stan Boyd

SUBJECT: Release Detection Requirements for Aboveground Piping

QUESTION:

Do the regulations require aboveground piping, connected to an underground storage tank, to be provided with a method of release detection?

SCOPE OF THIS DISCUSSION

In some locations, such as airport fuel farms, there are tank and piping configurations which include aboveground piping runs. The focus of this discussion is those piping runs, whether fill piping which conveys product to a tank, delivery piping which dispenses product from a tank or piping which connects two or more tanks together, which are totally aboveground.

APPLICABLE TENNESSEE PETROLEUM UNDERGROUND STORAGE TANK REGULATIONS

0400-18-01-.01(4)

> "Petroleum UST system" means an underground storage tank system that contains petroleum or a mixture of petroleum with de minimis quantities of other hazardous substances. Such systems include those containing motor fuels, jet fuels, distillate fuel oils, residual fuel oils, lubricants, petroleum solvents, and used oils.
>
> "Underground storage tank" or ``UST" means any one or combination of tanks (including underground pipes connected thereto) that is used to contain an accumulation of petroleum, and the volume of which (including the volume of underground pipes connected thereto) is 10 percent or more beneath the surface of the ground. This term does not include any: ....
>
> "UST system" or ``Tank system" means an underground storage tank, connected underground piping, underground ancillary equipment, and containment system, if any.

0400-18-01-.04 RELEASE DETECTION.

(1) General requirements for release detection.

(a) Owners and/or operators of new and existing UST systems must provide a method, or combination of methods, of release detection that:

1. Can detect a release from any portion of the tank and the connected underground piping that routinely contains petroleum;

(2) Requirements for petroleum UST systems.

Owners and operators of petroleum UST systems shall provide release detection for tanks and piping as follows:

(b) Piping. Underground piping that routinely contains petroleum must be monitored for releases in a manner that meets one of the following requirements:

DISCUSSION & ANALYSIS

The release detection requirements for piping are found in rule 0400-18-01-.04. In subparagraph (1)(a) the term UST system is used, so we must look at the definition of "UST system" contained in rule 0400-18-01-.01(4). The definition includes "connected underground piping"; relevant to this discussion is the word "underground". Aboveground piping is not included in this definition. Both part (1)(a)1 and subparagraph (2)(b) of rule 1200-1-15-.04 contain the words "underground piping", but not the words "aboveground piping".

While there are several regulatory references to underground piping, no regulations could be found which require release detection for piping which is totally aboveground. Therefore, it can be concluded that aboveground piping connected to an underground tank is not required by regulation to be provided with a method of release detection.

For combination piping runs, which contain both aboveground and underground piping, the requirements are those which apply to underground piping.

CONCLUSION

Piping associated with an UST which is totally aboveground is not required by rule to be provided with release detection.