

Tank Manifold Siphon Lines

It has come to our attention that in the past, there has been a verbal requirement that non-pressurized piping that manifolds two or more underground tanks together, such as a siphon piping system that was added after October 1, 2008 must be secondarily contained. After a review by our Staff, we have decided to put our current position in writing. MDEQ will allow the manifold line to be single wall unless it is joining together two double wall tanks that use interstitial monitoring. Part of our reasoning is based on our Regulation definition of piping (§ **280.12 Definitions**. *Pipe or Piping* means a hollow cylinder or tubular conduit that is constructed of non-earthen materials that routinely contains and conveys regulated substances from the underground storage tank to the dispenser or other end-use equipment.) Based on this definition, we are ruling that the manifold line does not strictly meet the definition of a pipe.

Our greater concern is for overfill devices to be set properly so that either manifolded tank is set at the appropriate tank capacity for restriction or shutoff which can be an issue if tanks are different sizes, depths, and tilt.

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