

Texas Commission on Environmental Quality

CHECKLIST WORKSHEET

IHW FOCUSED INVESTIGATION FOR LQG TANKS

Reg Ent Name : _____

Date : _____

Add ID _____

Investigator Name _____

Item No.	Description	Answer	Citations	Notes
	SECTION A: Tanks			
1	Is each tank clearly labeled or marked "Hazardous Waste"?		335.69(a)(3) 262.34(a)(3)	
2	Did generator exceed the accumulation time limitation?		335.69(a)(1)(B) 262.34(b)	
3	For regulated entities which accumulate hazardous waste in tanks for the purpose of facilitating proper recovery, treatment or disposal, is the tank clearly marked as required, or is the applicable information recorded and maintained in an operating record?		335.431(c)(1) 268.50(a)(2)(ii)	
	SECTION B: Existing Systems			
1	Does the tank system have secondary containment meeting the requirements of 40 CFR 265.193? If NON-COMPLIANT, then complete questions 2 and 3 of this section. If COMPLIANT, the answer to question 2 and 3 of this section is Not Applicable.		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193	
2	Does the tank system include any units exempt from secondary containment?		335.69(a)(1)(B) 262.34(a)(1)(ii) 265.193(g)	
3	Has the owner or operator obtained a variance for secondary containment?		335.69(a)(1)(B) 262.34(a)(1)(ii) 265.193(g)	
4	For non-enterable underground tanks, is a leak test repeated annually until secondary containment is provided? If tank system is exempt or has obtained a variance, the answer to #4 is Not Applicable.		265.193(i)(1) 335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii)	
5	For all other tanks (other than non-enterable underground) and ancillary equipment, is a leak test or integrity assessment conducted annually until secondary containment is provided? If tank system is exempt or has obtained a variance the answer to #5 is Not Applicable.		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(i)(2)	
	SECTION C: Containment of Releases - Complete this section ONLY for LQGs which have tank systems for which secondary containment is already a requirement.			
1	Does the tank system have secondary containment consisting of at least one of the following devices: Liner, Vault, Double-walled Tank, or an equivalent device approved by the TCEQ?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(d)	

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			265.193(d)(3) 265.193(d)(4)	
2	Is the secondary containment system for the tank a liner external to the tank? If NO, go to question #3. If YES, answer questions 2A, 2B, 2C and 2D.			
2A	Is the external liner designed or operated to contain 100% of the capacity of the largest tank within its boundary?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(1)(i)	
2B	Unless the collection system has sufficient excess capacity, is the external liner designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(1)(ii)	
2C	Is the external liner free of cracks or gaps?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(1)(iii)	
2D	Is the external liner designed and installed to completely surround the tank and to cover all surrounding earth likely to come into contact with the waste if released?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(1)(iv)	
3	Is the secondary containment system for the tank a vault? If NO, go to question #4. If YES, answer questions 3A, 3B, 3C, 3D, 3E and 3F.			
3A	Is the vault designed or operated to contain 100% of the capacity of the largest tank within its boundary?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(2)(i)	
3B	Unless the secondary containment collection system has sufficient excess capacity, is the vault designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(2)(ii)	
3C	Is the vault constructed with chemical-resistant water stops in place at all joints, if any?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(2)(iii)	
3D	Is the vault provided with an impermeable interior coating of lining that is compatible with the stored waste?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(2)(iv)	
3E	Is the vault provided with a means to protect against the formation of and ignition of vapors within the vault?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(2)(v)	

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3F	Is the vault provided with an exterior moisture barrier or other design to prevent migration of moisture?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(2)(vi)	
4	Is the secondary containment system for the tank a double-walled tank? If NO, go to Section D. If YES, answer questions 4A, 4B, 4C, 4D, 4E, 4F, 4G and 4H.			
4A	Is the double-walled tank designed as an integral structure so that any release from the inner tank is contained by the outer shell?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(3)(i)	
4B	If the double-walled tank is constructed with metal, is it protected from both corrosion of the primary tank interior and the external surface of the outer shell?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(3)(ii)	
4C	Is the double-walled tank provided with a built-in leak detection system capable of detecting a release within 24 hours or earliest practical time?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(e)(3)(iii)	
5	Is the double-walled tank's ancillary equipment (note certain exclusions) provided with full secondary containment?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(f)	
6	Is the double-walled secondary containment system constructed of, or lined with, materials that are compatible with the waste(s) to be placed in the tank system?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(c)(1)	
7	For the double-walled tank, is there evidence observed that the foundation is not supplying adequate structural support for the secondary containment, i.e., cracking gaps in joints, etc.?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(c)(2)	
8	Does the double-walled secondary containment system have a leak detection system?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(c)(3)	
9	Is the secondary containment system sloped and designed to drain and remove liquids resulting from leaks, spills, or precipitation?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(c)(4)	
	SECTION D: New Systems			
1	Has a proper tank assessment been conducted?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.192(a)	

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2	Were any components of the tank placed underground? If YES, complete questions 2A and 2B. If No, go to question #3.			
2A	Does assessment or as-built plans indicate that the backfill material is non-corrosive, porous, homogenous and which completely and adequately supports the tank and piping?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.192(c)	
2B	Does the assessment contain an analysis to determine that the underground tank system components will be protected from vehicular traffic?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.192(a)(4)	
3	Prior to covering, enclosing, or placing a new tank system or component into use, did an independent, qualified inspector or registered Professional Engineer (P.E.) inspect the system for the presence of weld breaks, punctures, scrapes of protective coatings, cracks, corrosion, or other structural damage or inadequate construction or installation?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.192(a)	
4	Was the tank and ancillary equipment tested for tightness prior to being covered, enclosed or placed in use?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.192(d)	
5	Was the new tank provided with secondary containment prior to being put into service?		335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.193(a)(1)	
6	Are installation statements maintained from those persons who supervised the tank system installation?		335.69(a)(1)(B) 262.34(a)(1)(ii) 265.192(g)	
	SECTION E: Additional Information			
1	Is a more in-depth investigation warranted? If YES, enter one of the following into the Comment area: a. [Applicable Type code] conducted during this investigation or b. In-depth investigation will be scheduled at a later date.			

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