

## Texas Commission on Environmental Quality

### CHECKLIST WORKSHEET

#### IHW EXISTING TANKS

**Regulating Entity Name**

**Date :**

**Additional I D:**

**Investigator Name:**

<b>Item Number</b>	<b>Description</b>	SECTION A: Accumulation Time Exemption (ATE)	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 1</b>	<b>Description</b>	Is each tank clearly labeled or marked "Hazardous Waste"?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 2</b>	<b>Description</b>	Did generator exceed the accumulation time limitation?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 3</b>	<b>Description</b>	For facilities 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?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 4</b>	<b>Description</b>	Have ignitable or reactive wastes been placed in tank systems? (If Yes, complete Section D)	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 5</b>	<b>Description</b>	Are incompatible wastes placed in the same tank system? (If Yes, complete Section E)	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 6</b>	<b>Description</b>	Does the regulated entity have Exempt 90-Day tanks which have been closed? (If Yes, complete Section G)	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	SECTION B: New Tank Systems. See separate New Tank Systems Checklist.	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	SECTION C: Existing Tank System Requirements	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 1</b>	<b>Description</b>	Does the tank system have secondary containment meeting the requirements of 40 CFR 265.193?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	If tanks system does have secondary containment meeting 40 CFR 265.193, then the rest of this section is N/A. If no, continue.	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 2</b>	<b>Description</b>	Does the tank system include any units exempt from secondary containment?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 3</b>	<b>Description</b>	Has the owner/operator obtained a variance for secondary containment?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number</b>	<b>Description</b>	NOTE: If tank system is exempt, or has obtained a variance, the rest of this section is N/A for those tanks.	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 4</b>	<b>Description</b>	For tanks without adequate secondary containment, has the existing tank system's integrity been properly assessed?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
<b>Item Number 5</b>	<b>Description</b>	If Yes, was the assessment reviewed and certified by an independent, qualified registered Professional Engineer?	
	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>

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Item Number 6	<b>Description</b> For non-enterable underground tanks, did the assessment include a proper leak test?	<b>Answer</b>	<b>Citations</b> 265.191(b)(5)(	<b>Notes</b>
Item Number 7	<b>Description</b> If yes to Question #6, is the leak test repeated annually until secondary containment is provided?	<b>Answer</b>	<b>Citations</b> 265.193(i)(1)	<b>Notes</b>
Item Number 8	<b>Description</b> 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?	<b>Answer</b>	<b>Citations</b> 265.193(i)(3)	<b>Notes</b>
Item Number 9	<b>Description</b> Is the written tank assessment kept on file at the facility?	<b>Answer</b>	<b>Citations</b> 265.191(a)	<b>Notes</b>
Item Number	<b>Description</b> SECTION D: Ignitable and Reactive Wastes	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number 1	<b>Description</b> Was the waste treated, rendered, or mixed before or immediately after placement in tank systems to no longer meet the definition of ignitable or reactive waste?	<b>Answer</b>	<b>Citations</b> 265.198(a)(1)(	<b>Notes</b>
Item Number	<b>Description</b> AND	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number 2	<b>Description</b> Did the regulated entity take precautions to prevent accidental ignition or reaction of wastes?	<b>Answer</b>	<b>Citations</b> 265.198(a)(2)	<b>Notes</b>
Item Number	<b>Description</b> OR	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number 3	<b>Description</b> Is the tank used solely for emergencies?	<b>Answer</b>	<b>Citations</b> 265.198(a)(3)	<b>Notes</b>
Item Number 4	<b>Description</b> Does the tank meet the distance requirements from public ways (streets, alleys, adjoining property line) according to the chart in Table 2-1 through 2-6 of the National Fire Protection Association (NFPA)?	<b>Answer</b>	<b>Citations</b> 265.198(b)	<b>Notes</b>
Item Number	<b>Description</b> SECTION E: Incompatible Wastes	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number 1	<b>Description</b> Did the regulated entity take precautions to prevent accidental ignition or reaction of waste? Incompatible wastes must not be placed in the same tank system.	<b>Answer</b>	<b>Citations</b> 265.199(a)	<b>Notes</b>
Item Number 2	<b>Description</b> If NO for Question #1, was the tank decontaminated prior to placing an incompatible waste in it?	<b>Answer</b>	<b>Citations</b> 264.199(b)	<b>Notes</b>
Item Number	<b>Description</b> SECTION F: Inspections	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number 1	<b>Description</b> Where present, does the owner/operator inspect the following each operating day:	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number 1A	<b>Description</b> Overfill/spill control equipment and freeboard?	<b>Answer</b>	<b>Citations</b> 265.195(b)(1)	<b>Notes</b>
Item Number 1B	<b>Description</b> Aboveground portions of tank system to detect corrosion or release of waste?	<b>Answer</b>	<b>Citations</b> 265.195(b)(2)	<b>Notes</b>

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<b>Item Number</b> 1C	<b>Description</b> Data gathered from monitoring and leak detection equipment to ensure that the tank is being operated according to design? <b>Answer</b> <b>Citations</b> 265.195(b) <b>Notes</b>
<b>Item Number</b> 1D	<b>Description</b> Construction materials and the area immediately surrounding the external accessible portions of the tank system, including secondary containment, to detect signs of releases of waste? <b>Answer</b> <b>Citations</b> 265.195(b)(3) <b>Notes</b>
<b>Item Number</b> 2	<b>Description</b> If present, have cathodic protection systems been inspected and confirmed to be working properly within 6 months after initial installation and annually thereafter? <b>Answer</b> <b>Citations</b> 265.195(f) <b>Notes</b>
<b>Item Number</b> 3	<b>Description</b> If present, are all sources of impressed current inspected and tested at least bimonthly? <b>Answer</b> <b>Citations</b> 265.195(f)(2) <b>Notes</b>
<b>Item Number</b> 4	<b>Description</b> Is the inspection information documented in the operating record? <b>Answer</b> <b>Citations</b> 265.195(g) <b>Notes</b>
<b>Item Number</b>	<b>Description</b> SECTION G: Closure <b>Answer</b> <b>Citations</b> <b>Notes</b>
<b>Item Number</b> 1	<b>Description</b> At closure of the tank system, did the generator remove or decontaminate all hazardous waste residues and contaminated system components, soils, structures and equipment? <b>Answer</b> <b>Citations</b> 264.195(a) <b>Notes</b>
<b>Item Number</b> 2	<b>Description</b> Did the regulated entity demonstrate that all contaminated soils could be removed or decontaminated? <b>Answer</b> <b>Citations</b> 264.197(b) <b>Notes</b>
<b>Item Number</b> 3	<b>Description</b> If No to Question #2, did the regulated entity close the tank system and perform post-closure care as a landfill? <b>Answer</b> <b>Citations</b> 264.197(b) <b>Notes</b>
<b>Item Number</b>	<b>Description</b> SECTION H: Containment of Releases <b>Answer</b> <b>Citations</b> <b>Notes</b>
<b>Item Number</b>	<b>Description</b> Complete this section ONLY for LQGs which have tank systems for which secondary containment is already a requirement. <b>Answer</b> <b>Citations</b> <b>Notes</b>
<b>Item Number</b> 1	<b>Description</b> 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? <b>Answer</b> <b>Citations</b> 264.193(d) <b>Notes</b>
<b>Item Number</b> 2	<b>Description</b> Does the secondary containment system meet the following requirements: <b>Answer</b> <b>Citations</b> <b>Notes</b>
<b>Item Number</b> 2A	<b>Description</b> For a liner external to the tank, is it: <b>Answer</b> <b>Citations</b> <b>Notes</b>
<b>Item Number</b> 2A1	<b>Description</b> Designed or operated to contain 100% of the capacity of the largest tank within its boundary? <b>Answer</b> <b>Citations</b> 264.193(e)(1)( <b>Notes</b>
<b>Item Number</b> 2A2	<b>Description</b> Unless the collection system has sufficient excess capacity, is it designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system? <b>Answer</b> <b>Citations</b> 264.193(e)(1)( <b>Notes</b>
<b>Item Number</b> 2A3	<b>Description</b> Free of cracks or gaps? <b>Answer</b> <b>Citations</b> 264.193(e)(1)( <b>Notes</b>

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Item Number 2A4	<b>Description</b> Designed and installed to completely surround the tank and to cover all surrounding earth likely to come into contact with the waste if released?	<b>Answer</b>	<b>Citations</b> 265.193(e)(1)(	<b>Notes</b>
Item Number	<b>Description</b> OR	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number 2B	<b>Description</b> For a vault, is it:	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number 2B1	<b>Description</b> Designed or operated to contain 100% of the capacity of the largest tank within its boundary?	<b>Answer</b>	<b>Citations</b> 265.193(e)(2)(	<b>Notes</b>
Item Number 2B2	<b>Description</b> Unless the secondary containment collection system has sufficient excess capacity, is it designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system?	<b>Answer</b>	<b>Citations</b> 265.193(e)(2)(	<b>Notes</b>
Item Number 2B3	<b>Description</b> Constructed with chemical-resistant water stops in place at all joints, if any?	<b>Answer</b>	<b>Citations</b> 265.193(e)(2)(	<b>Notes</b>
Item Number 2B4	<b>Description</b> Provided with an impermeable interior coating or lining that is compatible with the stored waste?	<b>Answer</b>	<b>Citations</b> 265.193(e)(2)(	<b>Notes</b>
Item Number 2B5	<b>Description</b> Provided with a means to protect against the formation of and ignition of vapors within the vault?	<b>Answer</b>	<b>Citations</b> 265.193(e)(2)(	<b>Notes</b>
Item Number 2B6	<b>Description</b> Provided with an exterior moisture barrier or other design to prevent migration of moisture?	<b>Answer</b>	<b>Citations</b> 265.193(e)(2)(	<b>Notes</b>
Item Number	<b>Description</b> OR	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number 2C	<b>Description</b> For a double-walled tank, is it:	<b>Answer</b>	<b>Citations</b>	<b>Notes</b>
Item Number 2C1	<b>Description</b> Designed as an integral structure so that any release from the inner tank is contained by the outer shell?	<b>Answer</b>	<b>Citations</b> 265.193(e)(3)(	<b>Notes</b>
Item Number 2C2	<b>Description</b> If constructed with metal, is it protected from both corrosion of the primary tank interior and the external surface of the outer shell?	<b>Answer</b>	<b>Citations</b> 265.193(e)(3)(	<b>Notes</b>
Item Number 2C3	<b>Description</b> Provided with a built-in leak detection system capable of detecting a release within 24 hours or earliest practical time?	<b>Answer</b>	<b>Citations</b> 264.193(e)(1)(	<b>Notes</b>
Item Number 2C4	<b>Description</b> Is ancillary equipment (note certain exclusions) provided with full secondary containment?	<b>Answer</b>	<b>Citations</b> 265.193(f)	<b>Notes</b>
Item Number 2C5	<b>Description</b> Is the secondary containment system constructed of, or lined with, materials that are compatible with the waste(s) to be placed in the tank system?	<b>Answer</b>	<b>Citations</b> 264.193(c)(1)	<b>Notes</b>
Item Number 2C6	<b>Description</b> Is there evidence observed that the foundation is not supplying adequate structural support for the secondary containment, i.e. cracking, gaps in joints, etc.?	<b>Answer</b>	<b>Citations</b> 264.193(c)(2)	<b>Notes</b>
Item Number 2C7	<b>Description</b> Does the secondary containment system have a leak detection system?	<b>Answer</b>	<b>Citations</b> 264.193(c)(3)	<b>Notes</b>

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IHW EXISTING TANKS (Cont)

<b>Item Number</b> 2C8	<b>Description</b> Is the secondary containment system sloped and designed to drain and remove liquids resulting from leaks, spills or precipitation? <b>Answer</b> <b>Citations</b> 264.193(c)(4) <b>Notes</b>
<b>Item Number</b> 2C9	<b>Description</b> For any tank system or secondary containment system that has had a leak, spill or been determined to be unfit for use: <b>Answer</b> <b>Citations</b> <b>Notes</b>
<b>Item Number</b> 2C9A	<b>Description</b> Was the unit immediately removed from service? <b>Answer</b> <b>Citations</b> 265.196 <b>Notes</b>
<b>Item Number</b> 2C9B	<b>Description</b> Was the flow restricted from entering the affected tank system or secondary containment system? <b>Answer</b> <b>Citations</b> 265.196(a) <b>Notes</b>
<b>Item Number</b> 2C9C	<b>Description</b> Was waste removed from the affected tank system or secondary containment system within 24 hours? <b>Answer</b> <b>Citations</b> 265.196(b) <b>Notes</b>
<b>Item Number</b> 2C9D	<b>Description</b> Was a release to the environment reported to the TCEQ within 24 hours? <b>Answer</b> <b>Citations</b> 265.196(d) <b>Notes</b>
<b>Item Number</b> 2C9E	<b>Description</b> If implementation of the Contingency Plan was required to remedy the leak or spill, was a report placed in the operating record? <b>Answer</b> <b>Citations</b> 264.56(i) <b>Notes</b>
<b>Item Number</b> 2C9F	<b>Description</b> If extensive repairs were made to the tank system prior to returning the system to service: <b>Answer</b> <b>Citations</b> <b>Notes</b>
<b>Item Number</b> 2C9F1	<b>Description</b> Was certification by an independent P.E. obtained prior to the unit's return to service? <b>Answer</b> <b>Citations</b> 264.196(f) <b>Notes</b>
<b>Item Number</b> 2C9F2	<b>Description</b> Was the certification submitted to the TCEQ within 7 days after returning the tank system to use? <b>Answer</b> <b>Citations</b> 262.34(a)(1)(ii) <b>Notes</b>
<b>Item Number</b> 2C9G	<b>Description</b> If the release to the environment was from a component of a tank system which had no secondary containment, was secondary containment provided to those components that cannot be visually inspected prior to returning the component to service? <b>Answer</b> <b>Citations</b> 264.196(e)(4) <b>Notes</b>