

## Texas Commission on Environmental Quality

### CHECKLIST WORKSHEET

IHW NEW TANKS

**Regulating Entity Name**

**Date :**

**Additional I D:**

**Investigator Name:**

| Item Number   | Description   | Answer | Citations        | Notes |
|---------------|---|--------|------------------|-------|
|               | SECTION A: Accumulation Time Exemption  |        |                  |       |
| Item Number 1 | Description Is each tank clearly labeled or marked "Hazardous Waste"?   | Answer | 335.69(a)(3)     | Notes |
| Item Number 2 | Description Did generator exceed the accumulation time limitations?   | Answer | 262.34(b)        | Notes |
| Item Number 3 | Description 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? (ref. 40 CFR 268.50(a)(2)(ii))  | Answer | 335.431(c)       | Notes |
| Item Number 4 | Description Have ignitable or reactive wastes been placed in tank systems? (If Yes, complete Section D)   | Answer |                  | Notes |
| Item Number 5 | Description Are incompatible wastes placed in the same tank system? (If Yes, complete Section E)  | Answer |                  | Notes |
| Item Number 6 | Description Does the regulated entity have Exempt 90-day tanks which have been closed? (If Yes, complete Section G)   | Answer |                  | Notes |
| Item Number   | Description SECTION B: New Systems  | Answer |                  | Notes |
| Item Number 1 | Description Has a proper tank assessment been conducted? (ref 40 CFR 265.192(a))  | Answer | 262.34(a)(1)(ii) | Notes |
| Item Number 2 | Description Were any components of the tank placed underground?   | Answer |                  | Notes |
| Item Number 3 | Description If YES:   | Answer |                  | Notes |
| Item Number A | Description 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?  | Answer | 264.19(c)        | Notes |
| Item Number B | Description Does the assessment contain an analysis to determine that the underground tank system components will be protected from vehicular traffic?  | Answer | 335.69(a)(1)(B)  | Notes |
| Item Number 4 | Description 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? | Answer | 264.192(b)       | Notes |
| Item Number 5 | Description Was the tank and ancillary equipment tested for tightness prior to being covered, enclosed or placed in use?  | Answer | 335.112(a)(9)    | Notes |

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|               |                    |  |                               |
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| Item Number 6 | <b>Description</b> | Was the new tank provided with secondary containment prior to being put into service?  |                               |
|               | <b>Answer</b>      | <b>Citations</b>   | 264.193(a)(1) <b>Notes</b>    |
| Item Number 7 | <b>Description</b> | Are installation statements maintained from those persons who supervised the tank system installation?   |                               |
|               | <b>Answer</b>      | <b>Citations</b>   | 335.69(a)(1)(B) <b>Notes</b>  |
| Item Number   | <b>Description</b> | SECTION C: Existing Systems (See Existing Systems Checklist)   |                               |
|               | <b>Answer</b>      | <b>Citations</b>   | <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>   | 262.34(a)(1)(i) <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 waste?   |                               |
|               | <b>Answer</b>      | <b>Citations</b>   | 262.34(a)(1)(i) <b>Notes</b>  |
| Item Number   | <b>Description</b> | OR   |                               |
|               | <b>Answer</b>      | <b>Citations</b>   | <b>Notes</b>                  |
| Item Number 3 | <b>Description</b> | Was the waste stored or treated such that it is protected from any material or condition that might cause it to ignite or react?   |                               |
|               | <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 4 | <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 5 | <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 wastes?  |                               |
|               | <b>Answer</b>      | <b>Citations</b>   | 335.152(a)(8) <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>   | 265.199(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 A | <b>Description</b> | Overfill/spill control equipment and freeboard?  |                               |
|               | <b>Answer</b>      | <b>Citations</b>   | 262.34(a)(1)(ii) <b>Notes</b> |
| Item Number B | <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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| Item Number C   | <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> | <b>Notes</b> |
|                 |                    |  | 335.152(a)(8)    |              |
| Item Number D   | <b>Description</b> | Construction materials and the area immediately surrounding the external accessible portions of tank system, including secondary containment, to detect signs of releases of waste?    |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
|                 |                    |  | 335.152(a)(8)    |              |
| Item Number 2   | <b>Description</b> | If present, have cathodic protection systems been inspected and confirmed to be working properly within 6 months after initial installation an annually thereafter?                    |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
|                 |                    |  | 335.152(a)(8)    |              |
| Item Number 3   | <b>Description</b> | If present, are all sources of impressed current inspected and tested at least bimonthly?  |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
|                 |                    |  | 264.195(g)(2)    |              |
| Item Number 4   | <b>Description</b> | Is the inspection information documented in the operating record?  |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
|                 |                    |  | 262.34(a)(1)(ii) |              |
| Item Number     | <b>Description</b> | SECTION G: Closure   |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
| Item Number 1   | <b>Description</b> | At closure of the tank system, did the generator remove or decontaminate all hazardous waste residues and contaminated containment system components, soils, structures and equipment? |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
|                 |                    |  | 265.197(a)       |              |
| Item Number 2   | <b>Description</b> | Did the regulated entity demonstrate that all contaminated soils could be removed or decontaminated?   |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
|                 |                    |  | 264.197(b)       |              |
| Item Number 3   | <b>Description</b> | If NO, did the regulated entity close the tank system and perform post-closure care as a landfill?   |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
|                 |                    |  | 262.34(a)(1)(ii) |              |
| Item Number     | <b>Description</b> | SECTION H: Containment of Releases   |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
| Item Number     | <b>Description</b> | Complete this section ONLY for LQGs which have tank system for which secondary containment is already a requirement.   |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
| Item Number 1   | <b>Description</b> | Does tank have secondary containment consisting of at least one of the following devices: Line, Vault, Double-walled tank or an equivalent device approved by the TCEQ?                |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
|                 |                    |  | 264.193(d)       |              |
| Item Number 2   | <b>Description</b> | Does secondary containment system meet the following requirements:   |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
| Item Number A   | <b>Description</b> | For a liner external to the tank, is it:   |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
| Item Number I   | <b>Description</b> | Designed or operated to contain 100% of the capacity of the largest tank within its boundar?   |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
|                 |                    |  | 335.152(a)(8)    |              |
| Item Number II  | <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> | <b>Notes</b> |
|                 |                    |  | 335.152(a)(8)    |              |
| Item Number III | <b>Description</b> | Free of cracks or gaps?  |                  |              |
|                 | <b>Answer</b>      |  | <b>Citations</b> | <b>Notes</b> |
|                 |                    |  | 264.193(e)(1)(   |              |
| Item Number IV  | <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?                                     |                  |              |

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|------------------------|--------------------|---|----------------|--------------|
|                        | <b>Answer</b>      | <b>Citations</b>  | 335.112(a)(9)  | <b>Notes</b> |
| <b>Item Number</b>     | <b>Description</b> | OR  |                |              |
|                        | <b>Answer</b>      | <b>Citations</b>  |                | <b>Notes</b> |
| <b>Item Number B</b>   | <b>Description</b> | For a vault, is it:   |                |              |
|                        | <b>Answer</b>      | <b>Citations</b>  |                | <b>Notes</b> |
| <b>Item Number I</b>   | <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)(2)( | <b>Notes</b> |
| <b>Item Number II</b>  | <b>Description</b> | Unless the secondary 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)(2)( | <b>Notes</b> |
| <b>Item Number III</b> | <b>Description</b> | Constructed with chemical-resistant water stops in place at all joints, if any?   |                |              |
|                        | <b>Answer</b>      | <b>Citations</b>  | 264.193(e)(2)( | <b>Notes</b> |
| <b>Item Number IV</b>  | <b>Description</b> | Provided with an impermeable interior coating or lining that is compatible with the stored waste?   |                |              |
|                        | <b>Answer</b>      | <b>Citations</b>  | 264.193(e)(2)( | <b>Notes</b> |
| <b>Item Number V</b>   | <b>Description</b> | Provided with a means to protect against the formation and/or ignition of vapors within the vault?  |                |              |
|                        | <b>Answer</b>      | <b>Citations</b>  | 264.193(e)(2)( | <b>Notes</b> |
| <b>Item Number VI</b>  | <b>Description</b> | Provided with an exterior moisture barrier or other design to prevent migration of moisture?  |                |              |
|                        | <b>Answer</b>      | <b>Citations</b>  | 264.193(e)(2)( | <b>Notes</b> |
| <b>Item Number</b>     | <b>Description</b> | OR  |                |              |
|                        | <b>Answer</b>      | <b>Citations</b>  |                | <b>Notes</b> |
| <b>Item Number C</b>   | <b>Description</b> | For a double-walled tank, is it:  |                |              |
|                        | <b>Answer</b>      | <b>Citations</b>  |                | <b>Notes</b> |
| <b>Item Number I</b>   | <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> |
| <b>Item Number II</b>  | <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> |
| <b>Item Number 111</b> | <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>  | 265.193(e)(3)( | <b>Notes</b> |
| <b>Item Number 3</b>   | <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> |
| <b>Item Number 4</b>   | <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> |
| <b>Item Number 5</b>   | <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.? (ref 265.193(c)(2))         |                |              |
|                        | <b>Answer</b>      | <b>Citations</b>  | 265.193(c)(2)  | <b>Notes</b> |
| <b>Item Number 6</b>   | <b>Description</b> | Does the secondary containment system have a leak detection system?   |                |              |
|                        | <b>Answer</b>      | <b>Citations</b>  | 264.193(c)(2)  | <b>Notes</b> |
| <b>Item Number 7</b>   | <b>Description</b> | Is the secondary containment system sloped and designed to drain and remove liquids resulting from leaks, spills or precipitation?  |                |              |

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|                       | <b>Answer</b>      | <b>Citations</b>  | 264.193(c)(4)    | <b>Notes</b> |
| <b>Item Number 8</b>  | <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 A</b>  | <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</b>  | <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 C</b>  | <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 D</b>  | <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 E</b>  | <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(j)        | <b>Notes</b> |
| <b>Item Number F</b>  | <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 I</b>  | <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>  | 335.112(a)(9)    | <b>Notes</b> |
| <b>Item Number II</b> | <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>  | 335.112(a)(9)    | <b>Notes</b> |
| <b>Item Number G</b>  | <b>Description</b> | If the release to the environment was from a component of a tank system which had not secondary containment, was secondary containment provided to those components that cannot be visually inspected prior to returning that component to service? |                  |              |
|                       | <b>Answer</b>      | <b>Citations</b>  | 262.34(a)(1)(ii) | <b>Notes</b> |