PST Compliance Webinar: How to Prepare for a UST Investigation

Texas Commission on Environmental Quality
Small Business and Local Government Assistance

Welcome to the PST Compliance Webinar

- Presenters: Rachel McMath and Becky Costigan
- Submit questions in Q&A panel on the right side of the screen (no participant microphones)
- TCEQ's Small Business and Local Government Assistance (SBLGA) Contact Information:
  - Compliance hotline: 1-800-447-2827
  - Email: PSTHelp@tceq.texas.gov

Today's Agenda

- Background Information
- Compliance Checklists
- Investigations
- Small Business & Local Government Assistance
- STEERS
- Discuss content of UST Compliance Notebook
- Discuss how to request records from TCEQ

Background

- Energy Act of 2005 requires states to inspect facilities with USTs every 3 years
- TCEQ and agency contractors perform investigations
- More than 252 administrative orders were filed by TCEQ in Fiscal Year 2022 with average penalty of $8,619

Compliance Checklists

- Energy Act
  - 10 focused regulatory points
- Modified compliance evaluation investigation (CEIMOD)
  - 40 regulatory points
- Temporarily out of service

Investigations

- Announced Investigation
  - Notice given
  - Records may be requested at time of notification
- Complaint Investigation
  - No notice given

Investigations- Violations

- Exit interview form given to facility
- Three violation categories:
  - Category A (most stringent)
  - Category B
  - Category C (least stringent)
- Field Citations
- If violations are noted, get in compliance and submit documentation ASAP – it could save $$$$

Investigations- Penalties

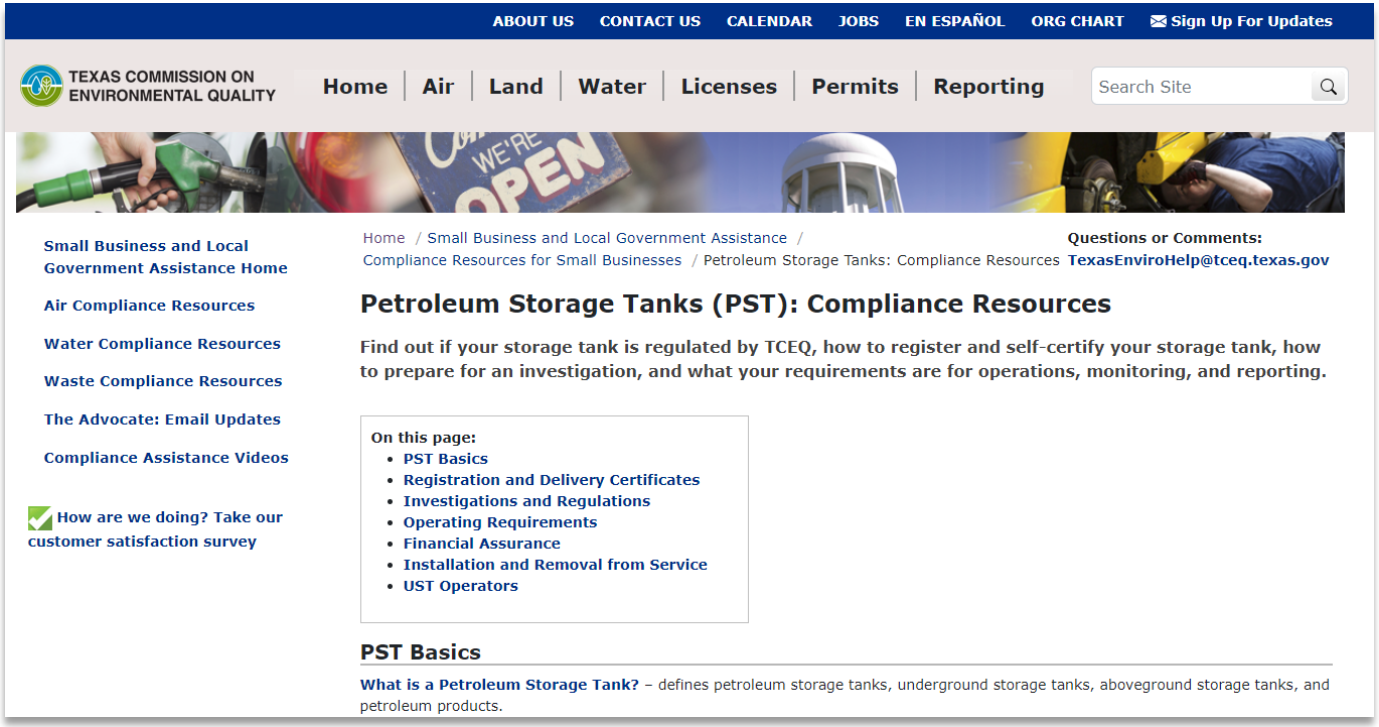
- Many factors go into penalty calculations:
  - Amount of throughput
  - Compliance History
  - Avoided Costs
  - Good faith reduction (25%)
  - Deferral for agreed order (20%)

What is SBLGA?

- Resources:
  - Guidance documents
  - Compliance webpage: www.texasenvirohelp.org
  - Hotline: 800-447-2827
  - Meetings with staff
  - EnviroMentor Program
  - The Advocate

SBLGA's PST Assistance Tools

- Petroleum Storage Tanks (PST): Compliance Resources webpage
- UST Compliance Notebook for Texas (RG-543)
- PST Super Guide (RG-475)
- PST Rule Summary

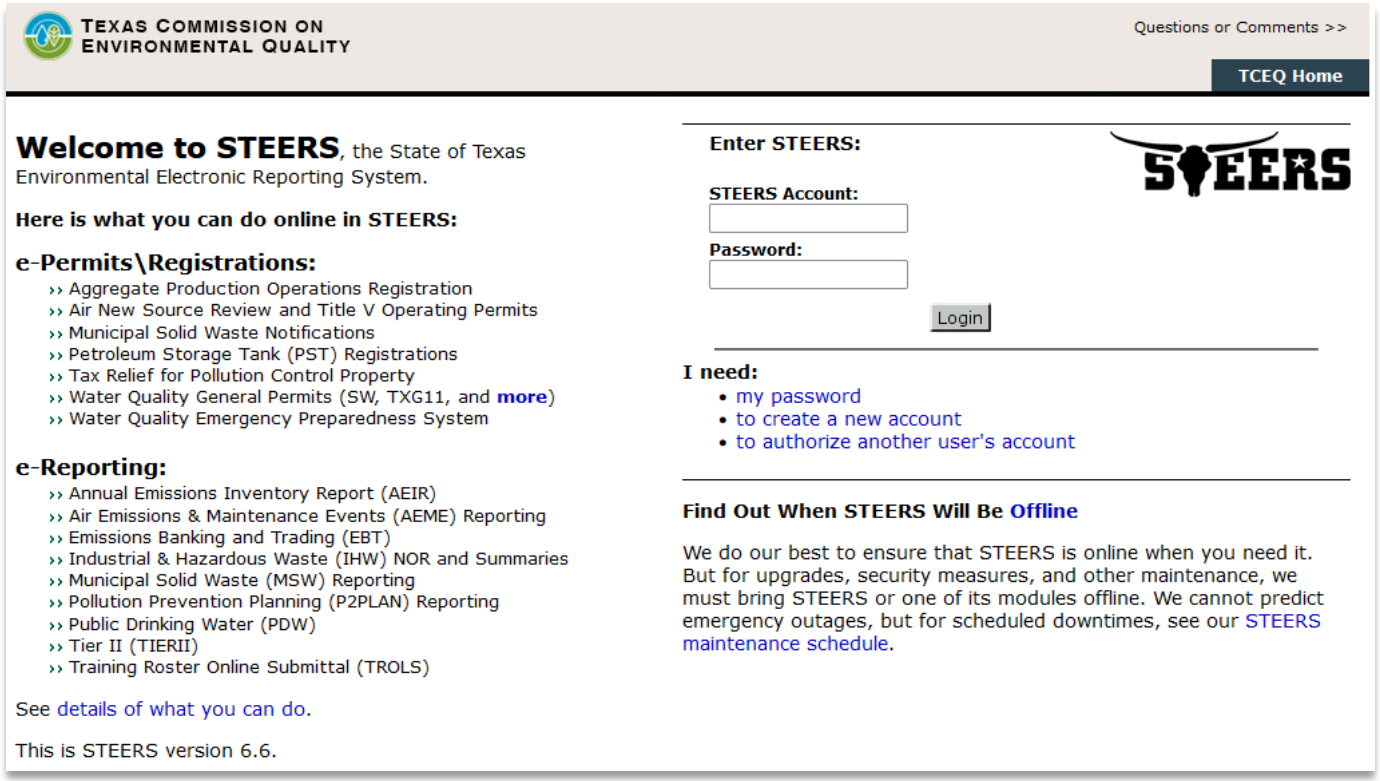


https://www.tceq.texas.gov/assistance/industry/pst

STEERS

- Initial registration and self-certification at your facility and the renewal self-certifications
- Construction Notification Form 0495
- Owner/operator changes
- System changes/updates
- Upload Operator training documentation and financial assurance documentation

Creating a STEERS Account



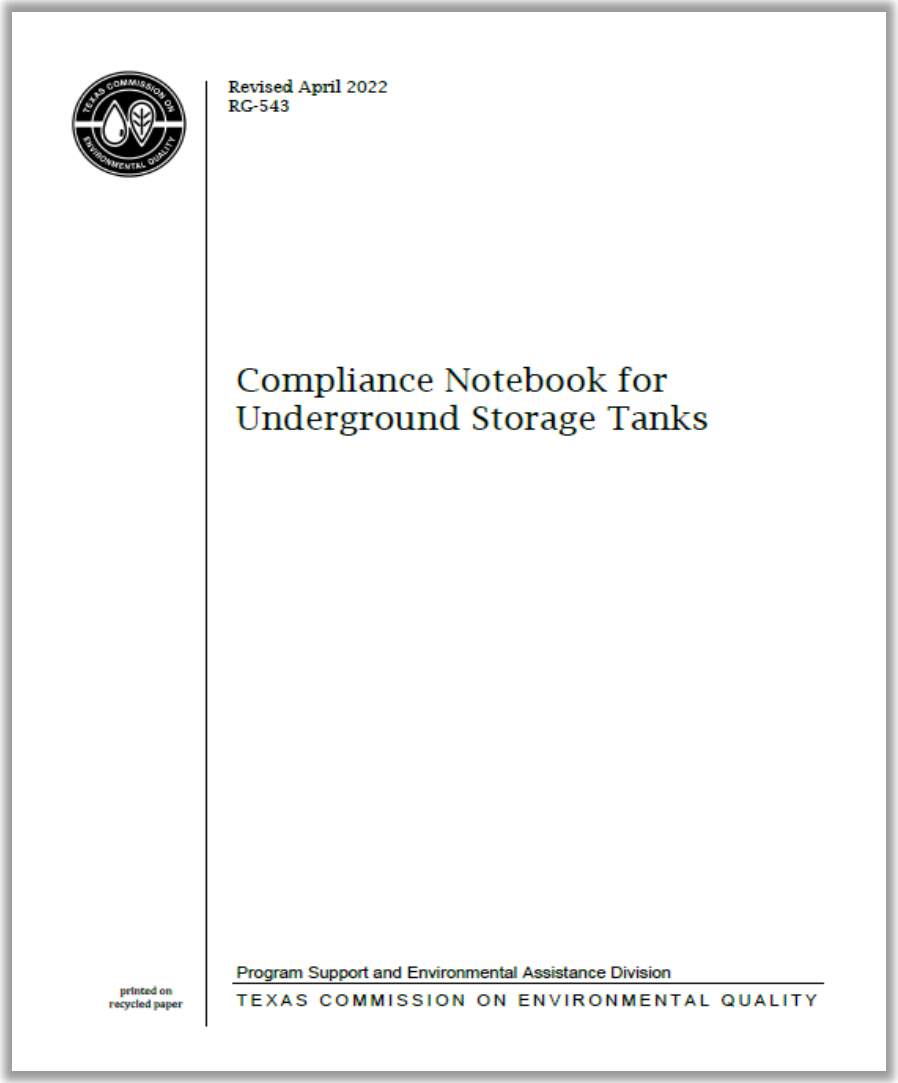
https://www3.tceq.texas.gov/steers/

1. Create an account in STEERS
2. Add “Petroleum Storage Tank Registrations” program to your account
   - Allow up to 5 days for processing before using STEERS to self-certify

Compliance Notebook

What's inside and how can it help you?

- Example records
- Blank log sheets
- Place to put necessary records



Instructions Page/General Info

- TCEQ rules are found in Title 30 of the Texas Administrative Code
  - Chapter 334 – Underground Storage Tanks
  - Chapter 37 – Financial Assurance
  - Chapter 115 – Stage I & II Vapor Recovery
  - Chapter 113 – Vapor Recovery adopted by reference
- Generally, keep records for 5 years or as long as the equipment is in use
  - Installation records should be kept for the life of the system

Notebook Content

- Registration and Self-Certification
- Financial assurance
- Corrosion protection
- Tank release detection
- Piping release detection
- Spill and overfill prevention
- Release reporting
- Construction and Maintenance
- Operator training
- Temporarily out of service USTs
- Stage I and Stage II vapor recovery
- Miscellaneous records

Registration and Self-Certification

Registration and Self-Certification Requirements

- Annual self-certification for USTs containing motor fuel
- Report changes within 30 days
  - Change of ownership/operator
  - Tank operational status
  - Change in substance stored
  - The addition of or change in type of:
    - internal/external corrosion protection,
    - spill and overfill prevention equipment, and
    - release detection methods or equipment

Registration and Self-Certification Records

- Registration/self-certification forms submitted or copies of STEERS submission confirmations in the past 5 years
- Registration certificate
- Delivery certificate
- Acknowledgment of Construction Notification Letter, if applicable (serves as temporary delivery certificate)

Note: Tanks and compartments should be physically numbered

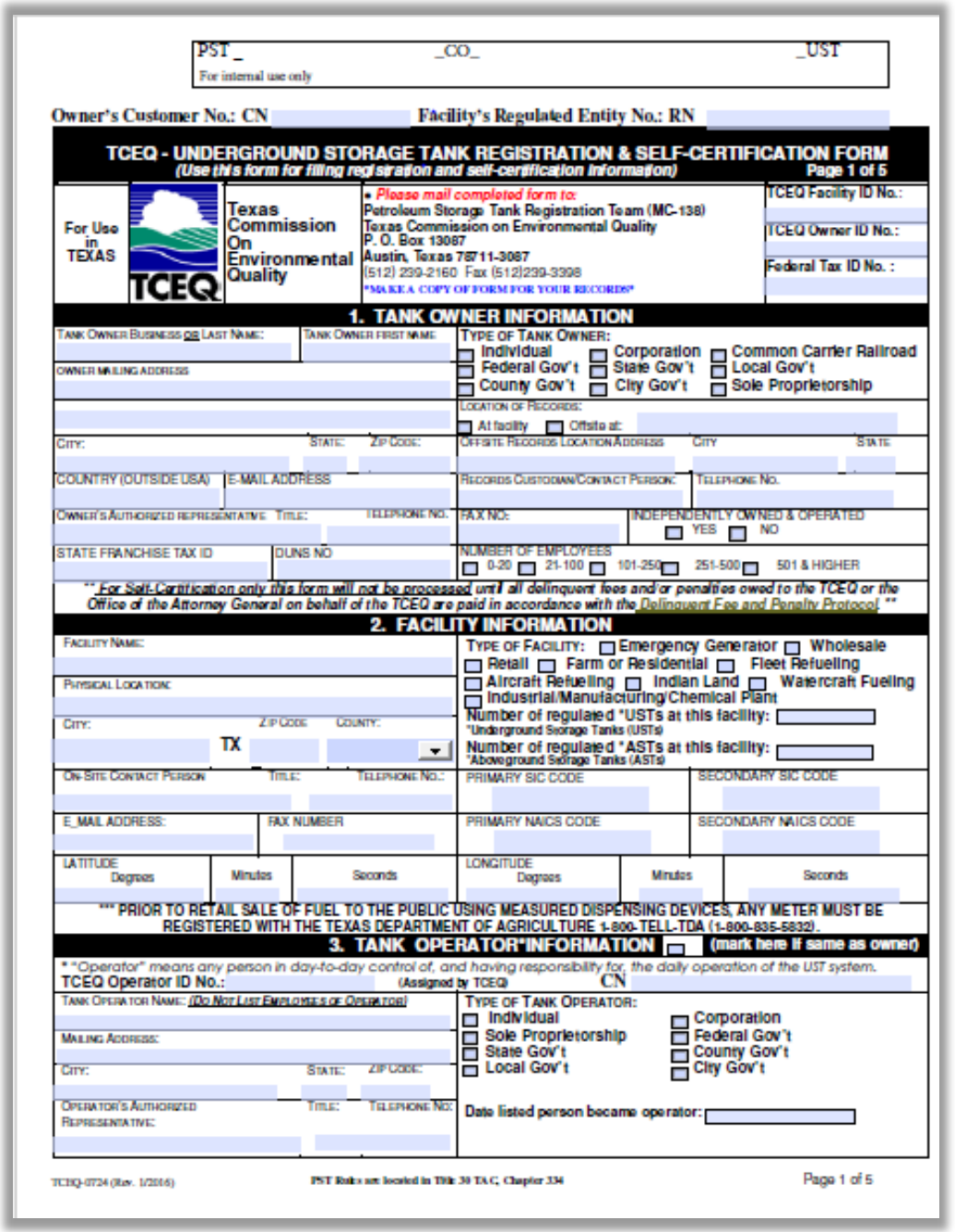
Tank Identification

Compartmental Tanks

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY


OPW
100
SERIES

TCEQ Form 0724



PST _ _CO_ _UST
For internal use only

Owner's Customer No.: CN Facility's Regulated Entity No.: RN

TCEQ - UNDERGROUND STORAGE TANK REGISTRATION & SELF-CERTIFICATION FORM
(Use this form for filing registration and self-certification information) Page 1 of 5

For Use in TEXAS — Texas Commission On Environmental Quality

• *Please mail completed form to:*
Petroleum Storage Tank Registration Team (MC-138)
Texas Commission on Environmental Quality
P. O. Box 13087
Austin, Texas 78711-3087
(512) 239-2160 Fax (512)239-3398
MAKE A COPY OF FORM FOR YOUR RECORDS

TCEQ Facility ID No.:
TCEQ Owner ID No.:
Federal Tax ID No. :

1. TANK OWNER INFORMATION

Tank Owner Business or Last Name: | Tank Owner First Name:
Type of Tank Owner: Individual, Federal Gov't, County Gov't, Corporation, State Gov't, City Gov't, Common Carrier Railroad, Local Gov't, Sole Proprietorship
Owner Mailing Address:
Location of Records: At facility, Offsite at:
City: | State: | Zip Code: | Offsite Records Location Address | City | State:
Country (Outside USA) | E-mail Address | Records Custodian/Contact Person: | Telephone No.
Owner's Authorized Representative Title: | Telephone No. | Fax No.: | Independently Owned & Operated: Yes, No
State Franchise Tax ID | DUNS No | Number of Employees: 0-20, 21-100, 101-250, 251-500, 501 & Higher

** For Self-Certification only this form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and Penalty Protocol. **

2. FACILITY INFORMATION

Facility Name:
Physical Location:
City: | Zip Code | County: | TX
On-Site Contact Person | Title: | Telephone No.:
E-mail Address: | Fax Number
Latitude: Degrees | Minutes | Seconds
Type of Facility: Emergency Generator, Wholesale, Retail, Farm or Residential, Fleet Refueling, Aircraft Refueling, Indian Land, Watercraft Fueling, Industrial/Manufacturing/Chemical Plant
Number of regulated *USTs at this facility: *Underground Storage Tanks (USTs)
Number of regulated *ASTs at this facility: *Aboveground Storage Tanks (ASTs)
Primary SIC Code | Secondary SIC Code
Primary NAICS Code | Secondary NAICS Code
Longitude: Degrees | Minutes | Seconds

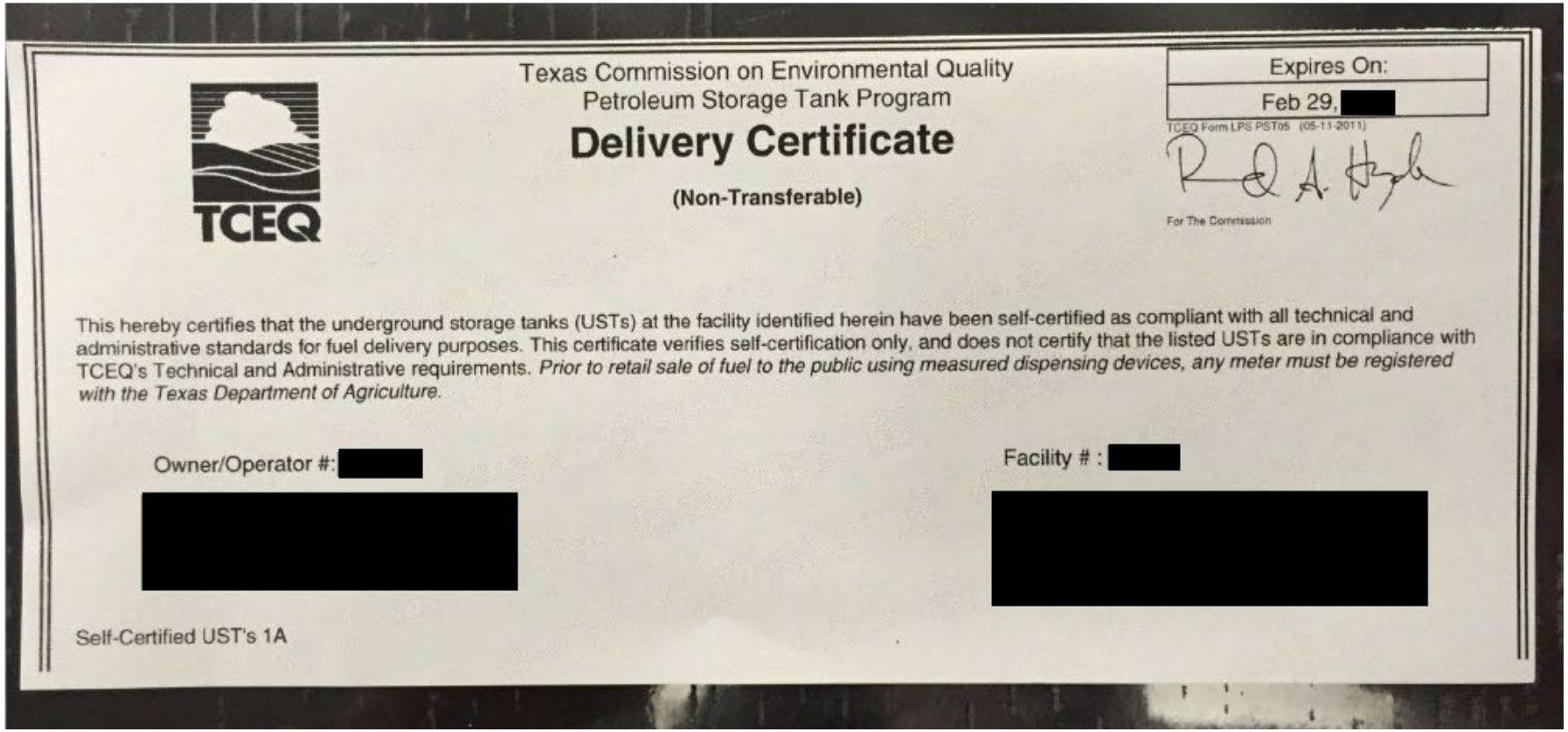
*** PRIOR TO RETAIL SALE OF FUEL TO THE PUBLIC USING MEASURED DISPENSING DEVICES, ANY METER MUST BE REGISTERED WITH THE TEXAS DEPARTMENT OF AGRICULTURE 1-800-TELL-TDA (1-800-835-5832).

3. TANK OPERATOR*INFORMATION (mark here if same as owner)

* "Operator" means any person in day-to-day control of, and having responsibility for, the daily operation of the UST system.
TCEQ Operator ID No.: (Assigned by TCEQ) CN
Tank Operator Name: *(Do Not List Employees of Operators)*
Type of Tank Operator: Individual, Sole Proprietorship, State Gov't, Local Gov't, Corporation, Federal Gov't, County Gov't, City Gov't
Mailing Address:
City: | State: | Zip Code:
Operator's Authorized Representative: | Title: | Telephone No.:
Date listed person became operator:

TCEQ-0724 (Rev. 1/2016) PST Rules are located in Title 30 TAC, Chapter 334 Page 1 of 5

Delivery Certificate Example



Texas Commission on Environmental Quality
Petroleum Storage Tank Program

Delivery Certificate

(Non-Transferable)

TCEQ

Expires On:
Feb 29, [redacted]

TCEQ Form LPS PST05 (05-11-2011)

For The Commission

This hereby certifies that the underground storage tanks (USTs) at the facility identified herein have been self-certified as compliant with all technical and administrative standards for fuel delivery purposes. This certificate verifies self-certification only, and does not certify that the listed USTs are in compliance with TCEQ's Technical and Administrative requirements. *Prior to retail sale of fuel to the public using measured dispensing devices, any meter must be registered with the Texas Department of Agriculture.*

Owner/Operator #: [redacted]

[redacted]

Facility # : [redacted]

[redacted]

Self-Certified UST's 1A

Financial Assurance

Financial Assurance Requirements

- Scope:
  - Corrective action (cleanup)
  - Third party liability (bodily injury & property damage)
- Most common coverage amount:
  - $1 Million per occurrence
  - $1 Million annual aggregate

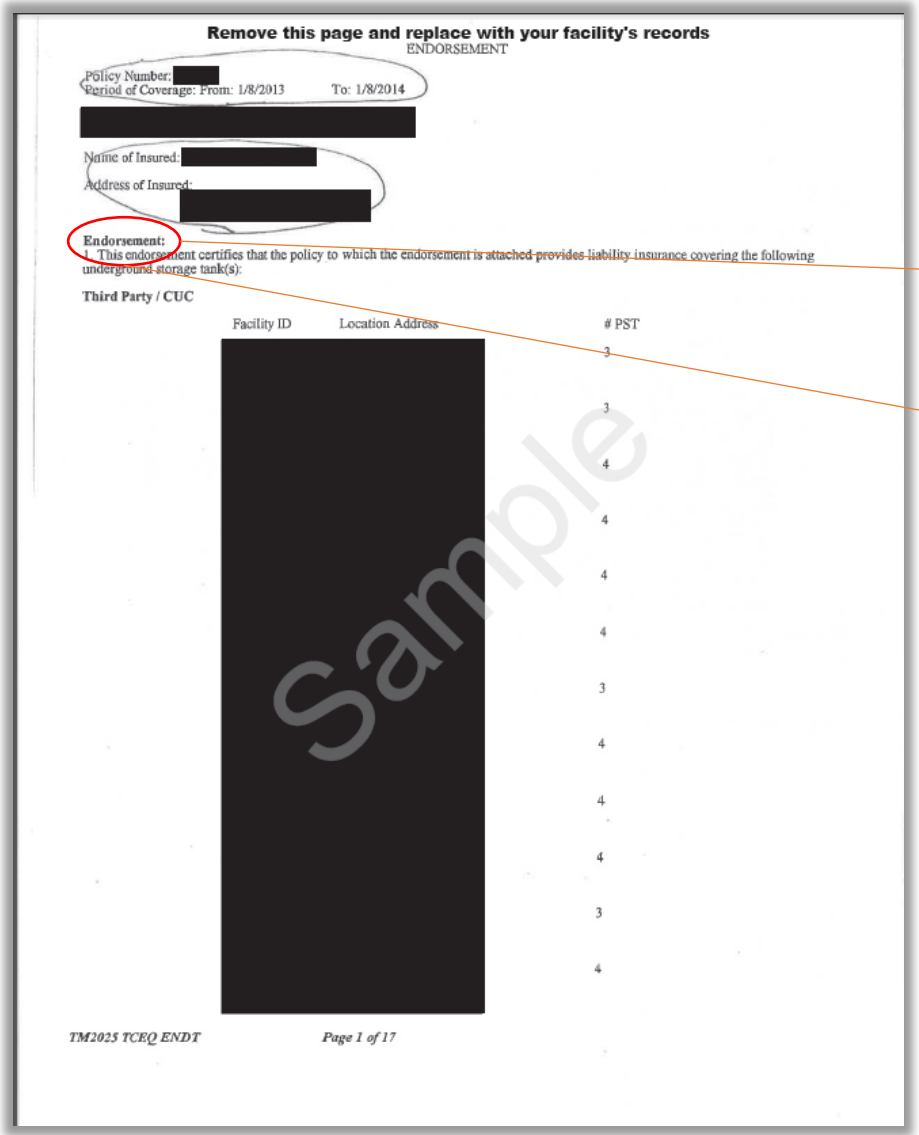
- Methods:
  - Insurance policy
  - Letter of credit
  - Surety bond
  - Financial test

Financial Assurance Records

- Current Certificate of Insurance, or
- Proof of other financial assurance
  - Letter of credit
  - Surety bond
  - Financial test

Submit proof of financial assurance with self-certification form

Certificate of Insurance Example



Remove this page and replace with your facility's records

ENDORSEMENT

Policy Number: [redacted]
Period of Coverage: From: 1/8/2013 To: 1/8/2014

[redacted]

Name of Insured: [redacted]

Address of Insured: [redacted]

Endorsement:

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering the following underground storage tank(s):

Third Party / CUC

Facility ID	Location Address	# PST
[redacted]		3
		3
		4
		4
		4
		4
		3
		4
		4
		4
		3
		4

Sample

TM2025 TCEQ ENDT *Page 1 of 17*

Endorsement

Corrosion Protection

Corrosion Protection Requirements

- Protect all underground/underwater metal components from corrosion
- Acceptable methods include:
  - Noncorrodible material
  - Electric isolation
  - Composite or Fiberglass-coated tanks (tanks only)
  - Cathodic protection

Cathodic Protection

- Two types:
  - Galvanic system
  - Impressed current system
- Testing frequency:
  - At installation
  - Within 3-6 months after installation, and
  - Every 3 years
  - Impressed current system: 60-day rectifier inspection

Cathodic Protection: 60-day Rectifier Inspection Results

60-Day Rectifier Inspection: Log Sheet

Rectifier Data

Manufacturer and Model		Serial Number	
Rated DC Output (Volts)		Rated DC Output (Amps)	
Rectifier Output* (Volts)		Rectifier Output* (Amps)	

**Record the "as designed" or most recently recommended rectifier output.*

Status Log

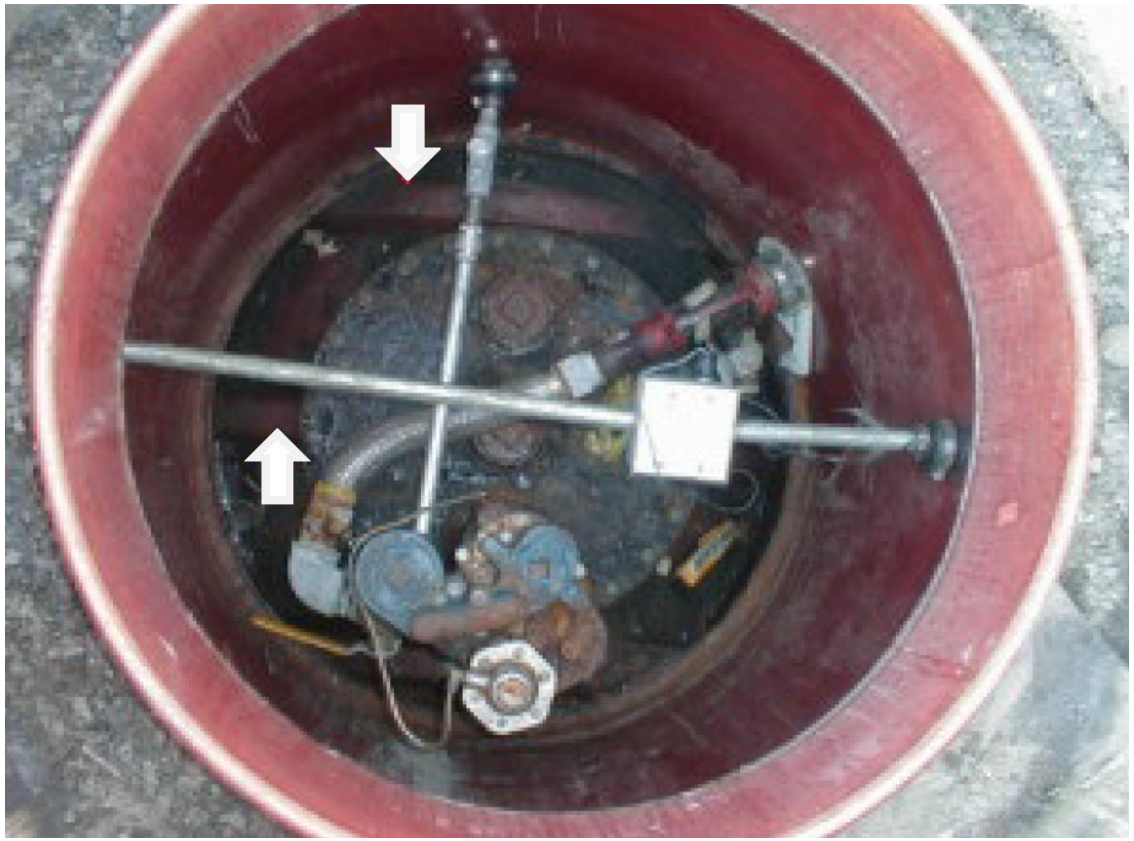
Date	Rectifier Turned	Tap Setting (Coarse)	Tap Setting (Fine)	DC Output (Volts)	DC Output (Amps)	Hour Meter	Inspector Initials	Comments

What Do Your Sumps Look Like?

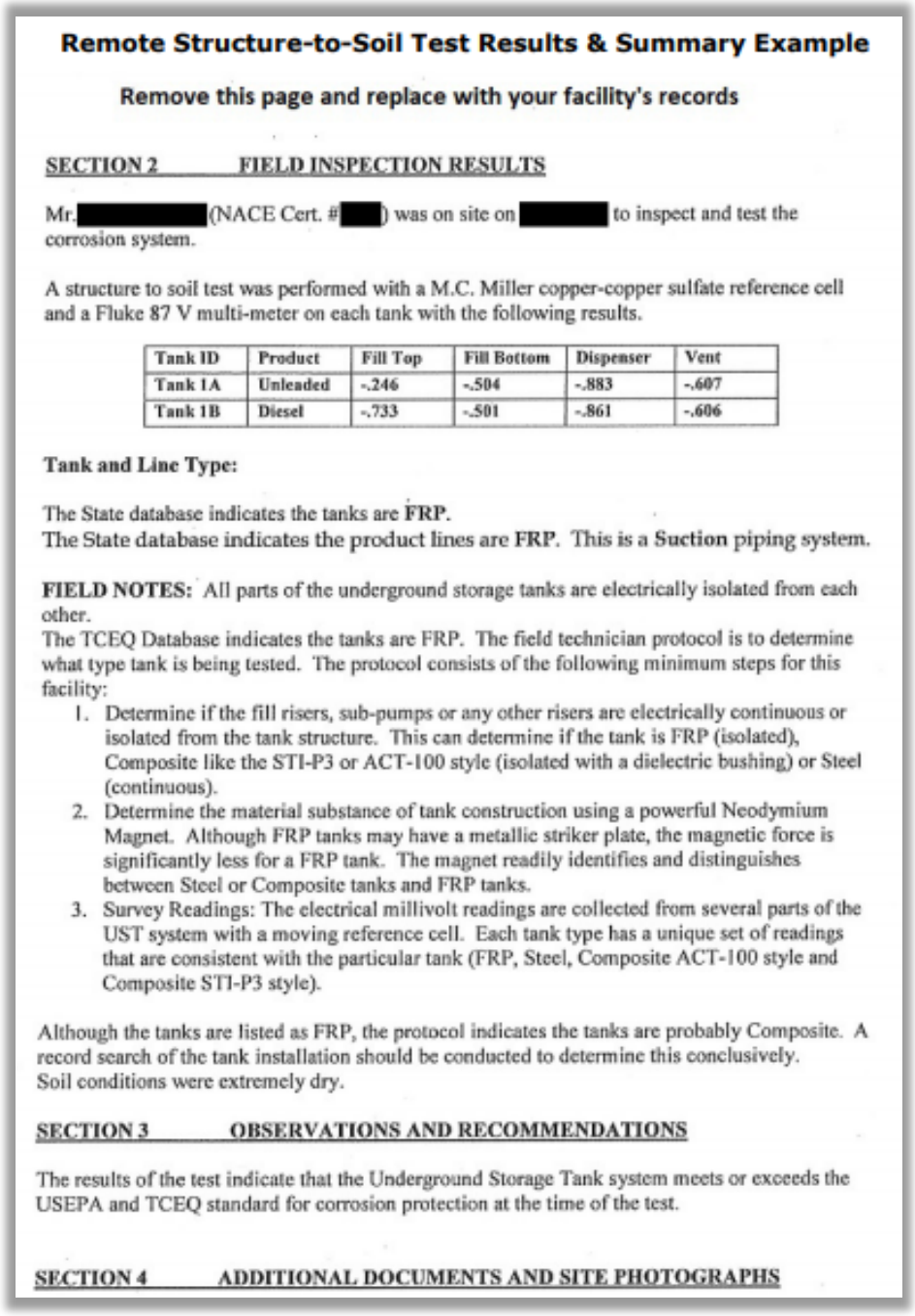
Corrosion Protection Records

- FRP tanks and piping, or Composite/clad/jacketed steel tanks
  - All installation records, or
  - Written statement from a licensed professional
- Cathodic Protection
  - Installation records
    - System information and design
  - Results of initial and periodic testing
  - 60-day rectifier inspection results, if applicable

FRP Tank “Ribs”



Remote Structure-to-Soil Test Results and Summary Example



Remote Structure-to-Soil Test Results & Summary Example

Remove this page and replace with your facility's records

SECTION 2 FIELD INSPECTION RESULTS

Mr. [redacted] (NACE Cert. # [redacted]) was on site on [redacted] to inspect and test the corrosion system.

A structure to soil test was performed with a M.C. Miller copper-copper sulfate reference cell and a Fluke 87 V multi-meter on each tank with the following results.

Tank ID	Product	Fill Top	Fill Bottom	Dispenser	Vent
Tank 1A	Unleaded	-.246	-.504	-.883	-.607
Tank 1B	Diesel	-.733	-.501	-.861	-.606

Tank and Line Type:

The State database indicates the tanks are **FRP.**
The State database indicates the product lines are **FRP.** This is a **Suction** piping system.

FIELD NOTES: All parts of the underground storage tanks are electrically isolated from each other.
The TCEQ Database indicates the tanks are FRP. The field technician protocol is to determine what type tank is being tested. The protocol consists of the following minimum steps for this facility:

1. Determine if the fill risers, sub-pumps or any other risers are electrically continuous or isolated from the tank structure. This can determine if the tank is FRP (isolated), Composite like the STI-P3 or ACT-100 style (isolated with a dielectric bushing) or Steel (continuous).
2. Determine the material substance of tank construction using a powerful Neodymium Magnet. Although FRP tanks may have a metallic striker plate, the magnetic force is significantly less for a FRP tank. The magnet readily identifies and distinguishes between Steel or Composite tanks and FRP tanks.
3. Survey Readings: The electrical millivolt readings are collected from several parts of the UST system with a moving reference cell. Each tank type has a unique set of readings that are consistent with the particular tank (FRP, Steel, Composite ACT-100 style and Composite STI-P3 style).

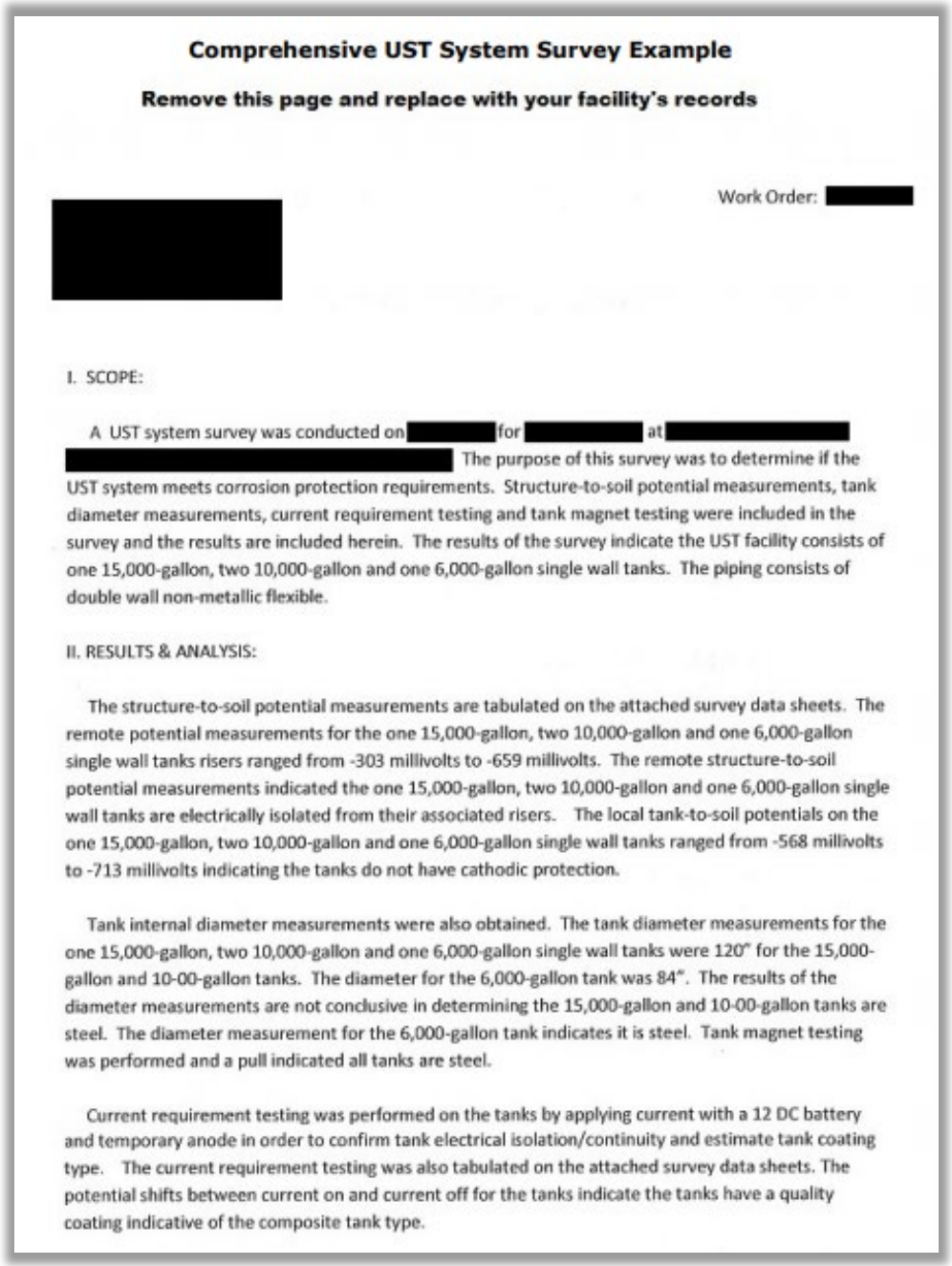
Although the tanks are listed as FRP, the protocol indicates the tanks are probably Composite. A record search of the tank installation should be conducted to determine this conclusively.
Soil conditions were extremely dry.

SECTION 3 OBSERVATIONS AND RECOMMENDATIONS

The results of the test indicate that the Underground Storage Tank system meets or exceeds the USEPA and TCEQ standard for corrosion protection at the time of the test.

SECTION 4 ADDITIONAL DOCUMENTS AND SITE PHOTOGRAPHS

Comprehensive UST System Survey Example



Comprehensive UST System Survey Example

Remove this page and replace with your facility's records

Work Order: [redacted]

[redacted]

I. SCOPE:

A UST system survey was conducted on [redacted] for [redacted] at [redacted] The purpose of this survey was to determine if the UST system meets corrosion protection requirements. Structure-to-soil potential measurements, tank diameter measurements, current requirement testing and tank magnet testing were included in the survey and the results are included herein. The results of the survey indicate the UST facility consists of one 15,000-gallon, two 10,000-gallon and one 6,000-gallon single wall tanks. The piping consists of double wall non-metallic flexible.

II. RESULTS & ANALYSIS:

The structure-to-soil potential measurements are tabulated on the attached survey data sheets. The remote potential measurements for the one 15,000-gallon, two 10,000-gallon and one 6,000-gallon single wall tanks risers ranged from -303 millivolts to -659 millivolts. The remote structure-to-soil potential measurements indicated the one 15,000-gallon, two 10,000-gallon and one 6,000-gallon single wall tanks are electrically isolated from their associated risers. The local tank-to-soil potentials on the one 15,000-gallon, two 10,000-gallon and one 6,000-gallon single wall tanks ranged from -568 millivolts to -713 millivolts indicating the tanks do not have cathodic protection.

Tank internal diameter measurements were also obtained. The tank diameter measurements for the one 15,000-gallon, two 10,000-gallon and one 6,000-gallon single wall tanks were 120" for the 15,000-gallon and 10-00-gallon tanks. The diameter for the 6,000-gallon tank was 84". The results of the diameter measurements are not conclusive in determining the 15,000-gallon and 10-00-gallon tanks are steel. The diameter measurement for the 6,000-gallon tank indicates it is steel. Tank magnet testing was performed and a pull indicated all tanks are steel.

Current requirement testing was performed on the tanks by applying current with a 12 DC battery and temporary anode in order to confirm tank electrical isolation/continuity and estimate tank coating type. The current requirement testing was also tabulated on the attached survey data sheets. The potential shifts between current on and current off for the tanks indicate the tanks have a quality coating indicative of the composite tank type.

Tank Release Detection

Tank Release Detection Requirements

- Tanks monitored for leaks at least once every 30 days
- Method must be able to detect a release of 0.2 gallon per hour (gph)
- Conduct in accordance with third-party certification requirements/limitations
    - Third-party certifications may be found at: https://neiwpcc.org/nwglde/
- Keep all release detection records for at least five years

30-day Walk-through Inspections

- Perform 30-day walkthrough inspections for release detection equipment:
  - Check for alarms
  - Check for unusual operating conditions
    - Dispensing equipment behaving erratically
    - Sudden loss of product from system
    - Unexplained water in the tank
  - Review records

30-Day Walkthrough Inspection Log

30-Day Release Detection Walkthrough Inspection: Log Sheet

Records Current?	Equipment Operational?	Name of Inspector	Description of Issues and Corrective Actions Taken (if any)	Date

Annual Testing and Walk-through

- Annually test release detection equipment
  - Test for good operating conditions and proper operation
  - According to manufacturer's instructions or standard code of practice
  - Examples: ATG/controllers, probes/sensors, ALLD, etc.

- Perform annual walkthrough inspections of handheld release detection equipment for operability
  - Examples: tank gauge sticks, groundwater bailers

Annual Testing and Walk-through Log

Annual Release Detection Testing and Inspection: Log Sheet

Test Date:		Tester Name:		Tester Signature:	

Equipment Test and Inspection Summary

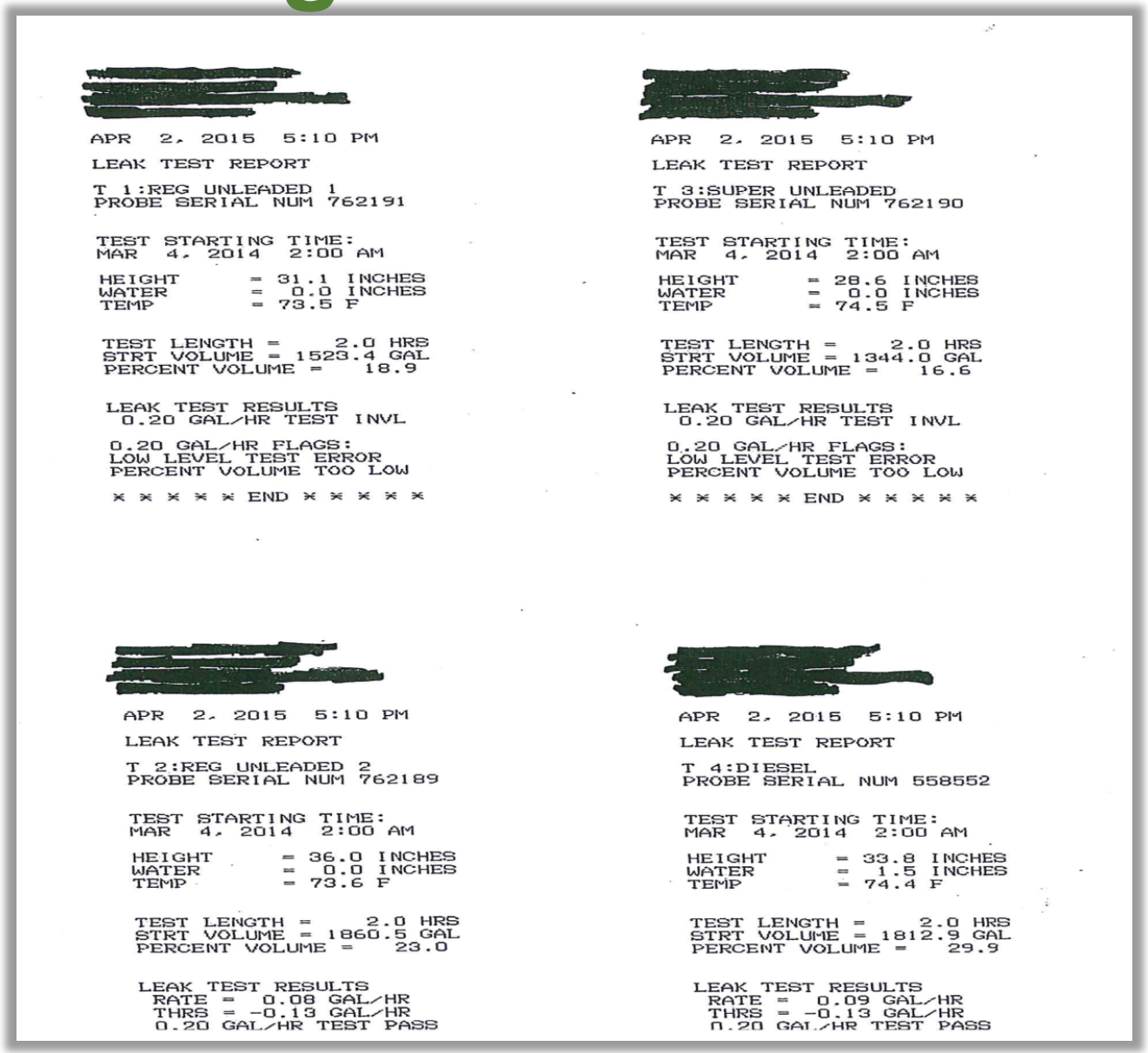
Equipment[h]	Tested and Inspected?	Needs Action?	Corrective Actions Taken (if any are needed)
Automatic tank gauge and other controllers: test the alarm and battery backup and verify the system configuration.			
Probes and sensors: test alarm operability and communication with controller, check for residual buildup, and confirm floats move freely, shaft is not damaged, and cables are free of kinks and breaks.			
Automatic line leak detector: confirm it can detect piping system releases[i] by simulating a leak.			
Vacuum pumps and pressure gauges: confirm they communicate with the sensors and controller.			
Hand-held electronic release detection equipment: confirm it operates properly.			
Groundwater and vapor monitoring equipment: make sure it operates properly.			
Handheld release detection equipment: (e.g., groundwater bailers) make sure it is operable and serviceable.			

h. Include any other release detection equipment in the blank rows of this table.
i. It must be able to detect releases of 3 gallons per hour at 10 pounds per square inch within 1 hour.

Methods: ATG & Inventory Control and SIR & Inventory Control

- Automatic tank gauging (ATG) with inventory control
  - One passing ATG test at least every 30 days
  - Inventory control with reconciliation
  - Exception: emergency generator tanks and used oil tanks only- may use ATG without inventory control
- Statistical inventory reconciliation (SIR) with inventory control
  - Results from SIR vendor no more than 15 calendar days following the last day of the 30-day period
  - Inventory control with reconciliation

ATG Passing Test



[redacted]

APR 2, 2015 5:10 PM

LEAK TEST REPORT

T 1:REG UNLEADED 1
PROBE SERIAL NUM 762191

TEST STARTING TIME:
MAR 4, 2014 2:00 AM

HEIGHT = 31.1 INCHES
WATER = 0.0 INCHES
TEMP = 73.5 F

TEST LENGTH = 2.0 HRS
STRT VOLUME = 1523.4 GAL
PERCENT VOLUME = 18.9

LEAK TEST RESULTS
0.20 GAL/HR TEST INVL

0.20 GAL/HR FLAGS:
LOW LEVEL TEST ERROR
PERCENT VOLUME TOO LOW

* * * * * END * * * * *

[redacted]

APR 2, 2015 5:10 PM

LEAK TEST REPORT

T 3:SUPER UNLEADED
PROBE SERIAL NUM 762190

TEST STARTING TIME:
MAR 4, 2014 2:00 AM

HEIGHT = 28.6 INCHES
WATER = 0.0 INCHES
TEMP = 74.5 F

TEST LENGTH = 2.0 HRS
STRT VOLUME = 1344.0 GAL
PERCENT VOLUME = 16.6

LEAK TEST RESULTS
0.20 GAL/HR TEST INVL

0.20 GAL/HR FLAGS:
LOW LEVEL TEST ERROR
PERCENT VOLUME TOO LOW

* * * * * END * * * * *

[redacted]

APR 2, 2015 5:10 PM

LEAK TEST REPORT

T 2:REG UNLEADED 2
PROBE SERIAL NUM 762189

TEST STARTING TIME:
MAR 4, 2014 2:00 AM

HEIGHT = 36.0 INCHES
WATER = 0.0 INCHES
TEMP = 73.6 F

TEST LENGTH = 2.0 HRS
STRT VOLUME = 1860.5 GAL
PERCENT VOLUME = 23.0

LEAK TEST RESULTS
RATE = 0.08 GAL/HR
THRS = -0.13 GAL/HR
0.20 GAL/HR TEST PASS

[redacted]

APR 2, 2015 5:10 PM

LEAK TEST REPORT

T 4:DIESEL
PROBE SERIAL NUM 558552

TEST STARTING TIME:
MAR 4, 2014 2:00 AM

HEIGHT = 33.8 INCHES
WATER = 1.5 INCHES
TEMP = 74.4 F

TEST LENGTH = 2.0 HRS
STRT VOLUME = 1812.9 GAL
PERCENT VOLUME = 29.9

LEAK TEST RESULTS
RATE = 0.09 GAL/HR
THRS = -0.13 GAL/HR
0.20 GAL/HR TEST PASS

SIR Results

Remove this form and replace with your facility's records

Monthly SIR Report - [redacted] Page 1 of 1

[redacted]

MONTHLY STATISTICAL INVENTORY RECONCILIATION (SIR) REPORT

FACILITY NAME: [redacted] FACILITY ID#: [redacted]

TANK LOCATION: [redacted]
Houston, TX 77032

( ) OWNER/ [redacted] PHONE: [redacted]

( ) OPERATOR: [redacted]
Houston, TX 77032

SIR PROVIDER: [redacted] Phone: 1-(772)-[redacted]

SIR VERSION: [redacted] DATE OF SIR REPORT: 09/18/2013 TIME 13:30:40

PERIOD COVERED: 08/13 Data points to calculate leak rate: 20 or more

TANK NUMBER	TANK CONTENTS	TANK CAPACITY	LEAK THRESHOLD	MIN. DET. LEAK RATE	CALCULATED LEAK RATE	CRRNT P	CRRNT F	CRRNT I	PREV. P	PREV. F	PREV. I	2 MO. P	2 MO. F	2 MO. I
1100	Regular	16000	0.005	0.010	0.002	X			X			X		
1300	Premium	6000	0.052	0.104	-0.008			X			X			X

NOTE: ( ) OWNER/( ) OPERATOR -> Be sure to check the appropriate status.
CRRNT = Current Month, PREV = Previous Month, 2 MO. = 2 months prior
P|F|I = Pass, Fail and Inconclusive

1. A copy of this SIR report form shall be maintained on-site for review for each month that SIR is used for release detection.
2. [redacted]
3. Results of each monthly analysis must include the calculated results from the data set for leak threshold, the minimum detectable leak rate, the calculated leak rate, and a determination of whether the result of the test was 'Pass', 'Fail', or 'Inconclusive'.
4. 'Pass' means the calculated leak rate for the data set is less than the leak threshold and the minimum detectable leak rate is less than or equal to the certified performance standard (0.2gph).
5. 'Fail' means the calculated leak rate for the data set is equal to or greater than the leak threshold.
6. 'Inconclusive' means the minimum detectable leak rate exceeds the certified performance standard (0.2gph) and the calculated leak rate is less than the leak threshold. If for any other reason the test result is not a 'Pass' or 'Fail', the result is 'Inconclusive'.
7. An incident Notification Form shall be submitted to the regulators when a monthly SIR report of 'Fail' is received, or after the receipt of one monthly SIR report of 'Inconclusive'.
8. S.I.R monitors the complete UST system, from UST fuel tube to dispenser, including the piping. In certain states passing S.I.R. test can be substituted for annual line test. The UST owner/operator is responsible for obtaining the applicable states regulations concerning S.I.R. and required line test.

Fail/inconclusive for one month – must fill out suspected release for + research problem

Person conducting evaluation: [redacted] Date: 09/18/2013
Signature: ______
Tank Owner/Operator: ______ Date: __/__/__
Signature: ______

[redacted]

30-Day Inventory Control

Release Detection Records

Applicable Regulations: 30 TAC 334.10, 30 TAC 334.48, and 30 TAC 334.50

Include

- Release detection records for tanks (see page 33)
- Release detection records for piping (see page 71)

Instructions

Update records in this section as described for your types of equipment. Find more information about each record on the pages listed above.

- For more information on release detection requirements, see our guide to *PST Release Detection and Inventory Control*[13] (RG-475g).
- If inventory control is part of your release detection methods, see EPA's *Doing Inventory Control Right*[14] guide and our easy-to-use Excel worksheets:
  - Blended Fuel Inventory Control Worksheet[15]
  - Non-Blended Fuel Inventory Control Worksheet[16]

Inventory Reconciliation

30-Day Calculations

Water Level Reading	Date of Water Level	Sum for Daily Gallons Dispensed	Math Check	Leak Check	Last Day Stick Reading	Sum for Gallons Delivered	Sum for Daily Over/Short (absolute value)
		0	0	130		0	0
Is the Sum for Daily Over/Short greater than the Leak Check result?					**Yes**	**No**	

Method: Interstitial Monitoring

- Monitor space between inner and outer walls of double-walled or jacketed tanks
- Tanks and piping installed on or after January 1, 2009, must use interstitial monitoring as the primary form of release detection.
- Check sensors at least once every 30 days

Interstitial Monitoring Log

Interstitial Sensor Monitoring: Log Sheet

Sensor Location

Sensor 1	Sensor 2	Sensor 3	Sensor 4	Sensor 5	Sensor 6	Sensor 7	Sensor 8

Sensor Status Log

Date	S1	S2	S3	S4	S5	S6	S7	S8	Inspector Initials	Comments

Method: Groundwater and Vapor Monitoring

Groundwater or Vapor Well Inspection: Log Sheet

Groundwater Depth

From Ground Surface:	
To Tank Bottom:	

All depths measured in feet.

Vapor Reading Instrument and Depth Information

Depth from Ground Surface to Tank Bottom:	
Instrument Name and Type:	
Date of Last Instrument Calibration:	

Groundwater or Vapor Monitoring Well Inspections

Date	Well 1	Well 2	Well 3	Well 4	Well 5	Well 6	Free Product in Well?	Comments	Inspector Initials
							☐ Yes ☐ No		
							☐ Yes ☐ No		
							☐ Yes ☐ No		
							☐ Yes ☐ No		
							☐ Yes ☐ No		
							☐ Yes ☐ No		
							☐ Yes ☐ No		
							☐ Yes ☐ No		
							☐ Yes ☐ No		
							☐ Yes ☐ No		
							☐ Yes ☐ No		
							☐ Yes ☐ No		
							☐ Yes ☐ No		

Method: Secondary Containment Barriers

Secondary Containment Monitoring: Log Sheet

Monitoring Method

Select Your Monitoring Method:	☐ Electronic Sensors	☐ Observation Wells

Vapor Monitoring Well Inspections

Date	Sensor/ Well 1	Sensor/ Well 2	Sensor/ Well 3	Sensor/ Well 4	Sensor/ Well 5	Sensor/ Well 6	Comments	Inspector Initials

Method: Manual Tank Gauging

Manual Tank Gauging: Weekly Log Sheet

Start of Test Record

Data to Record	Tank ID:	Tank ID:	Tank ID:	Tank ID:
Test Start (Date and Time)				
First Stick Reading (inches)				
Second Stick Reading (inches)				
Average of Initial Readings (inches)				
Initial Gallons (Convert from inches)				

End of Test Record (tank IDs continue from above)

Data to Record				
Test End (Date and Time)				
First Stick Reading (inches)				
Second Stick Reading (inches)				
Average of Final Readings (inches)				
Final Gallons (Convert from inches)				

Test Results (tank IDs continue from above)

Data to Record				
Change in Tank Volume (gallons + or -)				
Tester Initials				
Tank Passes Test?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Manual Tank Gauging: Monthly Average Log Sheet

Month and Year:

Data to Record	Tank ID:	Tank ID:	Tank ID:	Tank ID:
Week 1 Volume Change				
Week 2 Volume Change				
Week 3 Volume Change				
Week 4 Volume Change				
Monthly Average (+ or -)				
Tank Passes Test?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Month and Year:

Data to Record	Tank ID:	Tank ID:	Tank ID:	Tank ID:
Week 1 Volume Change				
Week 2 Volume Change				
Week 3 Volume Change				
Week 4 Volume Change				
Monthly Average (+ or -)				
Tank Passes Test?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Month and Year:

Data to Record	Tank ID:	Tank ID:	Tank ID:	Tank ID:
Week 1 Volume Change				
Week 2 Volume Change				
Week 3 Volume Change				
Week 4 Volume Change				
Monthly Average (+ or -)				
Tank Passes Test?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Method: 30-Day Tank Gauging

30-Day Tank Gauging: Log Sheet

Start of Test Record

Data to Record	Tank ID:	Tank ID:	Tank ID:	Tank ID:
Test Start (Date and Time)				
First Stick Reading (inches)				
Second Stick Reading (inches)				
Average of Initial Readings (inches)				
Initial Gallons (Convert from inches)				

End of Test Record (tank IDs continue from above)

Data to Record				
Test End (Date and Time)				
First Stick Reading (inches)				
Second Stick Reading (inches)				
Average of Final Readings (inches)				
Final Gallons (Convert from inches)				

Test Results (tank IDs continue from above)

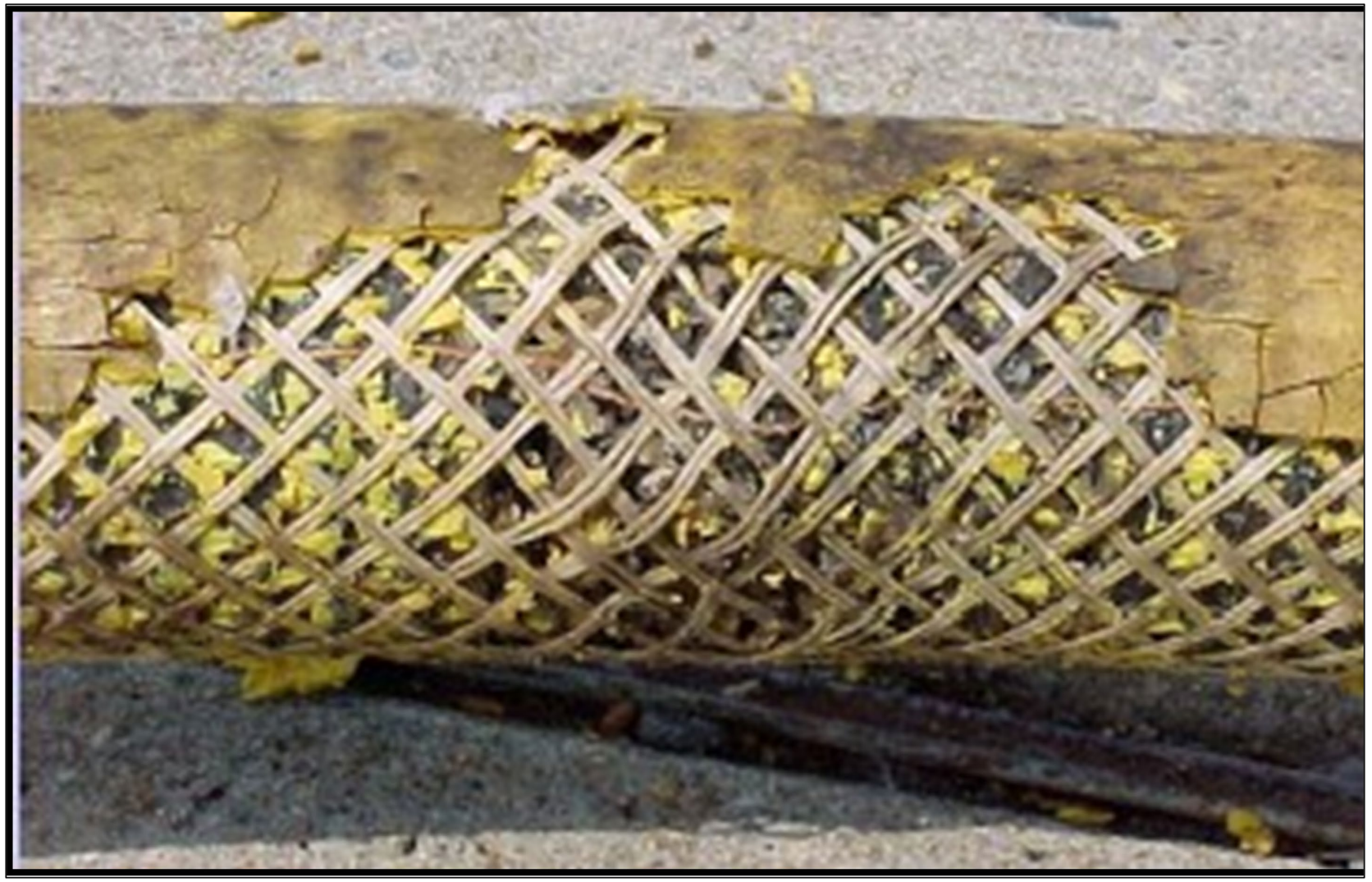
Data to Record				
Change in Tank Volume (gallons + or -)				
Tester Initials				
Tank Passes Test?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Questions and Break

- Contact regional SBLGA staff
- Hotline: 1-800-447-2827
- Email: PSTHelp@tceq.texas.gov
- www.texasenvirohelp.org

Submit Questions to Q&A

Piping Release Detection



Piping Release Detection Requirements

- Pressurized piping
  - Automatic line leak detector (3 gph)
  - Monitoring every 30 days (0.2 gph) or annually (0.1 gph)
  - Shear valves
- Suction piping
  - Monitoring every 30 days (0.2 gph) or every 3 years (0.1 gph)
- Conduct in accordance with third-party certification requirements/limitations

Pressurized Piping Release Detection Records

- Pressurized piping systems:
  - Automatic line leak detector function test AND
  - Annual piping tightness test results OR
  - Vapor or groundwater monitoring results OR
  - Interstitial monitoring OR
  - SIR and inventory control OR
  - Electronic leak monitoring

Suction Piping Release Detection Records

- Suction Piping
  - 3-year piping tightness results OR
  - Vapor or groundwater monitoring results OR
  - Interstitial monitoring OR
  - SIR and inventory control

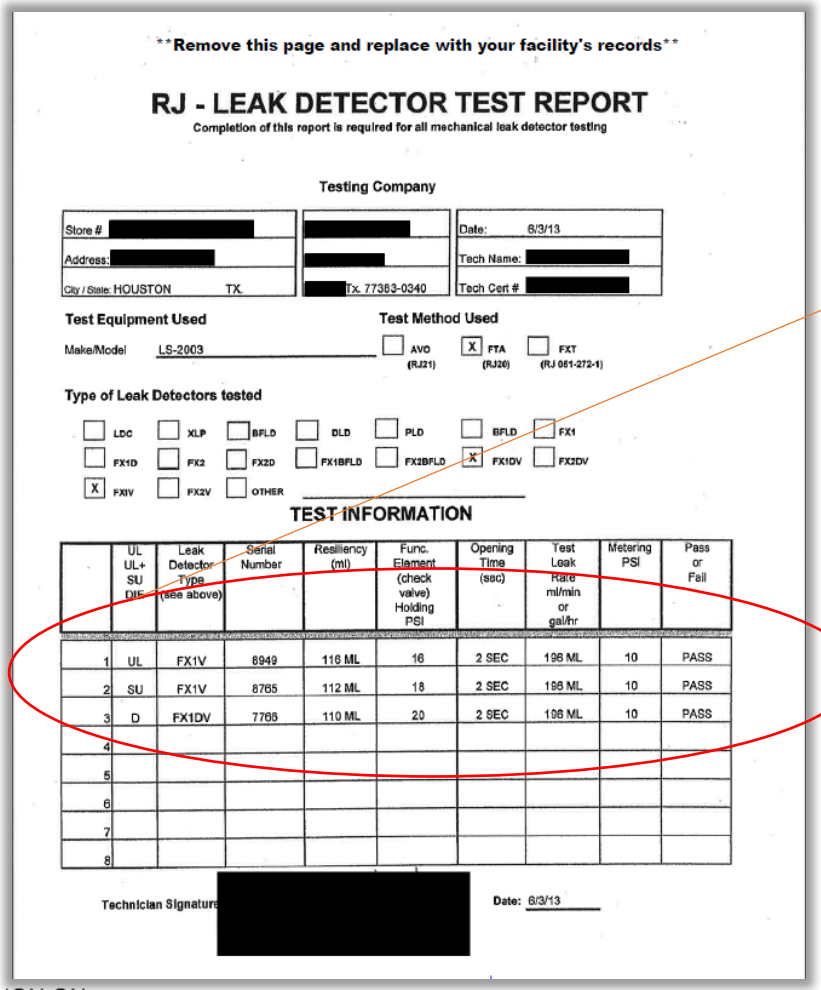
- Suction piping with no more than one high mounted check valve located at the suction line
  - Provide as-built drawings or written documentation from registered UST contractor

Methods for Piping Release Detection

Table 5. Release Detection Methods for Piping

Release Detection Method	Required Records	Frequency
Piping tightness test	Test results	Pressurized systems: every year Suction systems: every 3 years
Groundwater or vapor monitoring	Logs of dates monitored and any results	Every 30 days
Interstitial monitoring (secondary containment)	Logs of dates monitored and any results	Every 30 days for monitoring logs.
Statistical Inventory with Reconciliation (SIR)[j]	Results from an SIR vendor stating "Pass," "Fail," or "Inconclusive" and inventory control records	Every 30 days
Electronic leak monitoring	Logs of dates monitored and any results	Every 30 days

Automatic Line Leak Detector Test: Mechanical



Remove this page and replace with your facility's records

RJ - LEAK DETECTOR TEST REPORT

Completion of this report is required for all mechanical leak detector testing

Testing Company

Store # [redacted]
Address: [redacted]
City / State: HOUSTON TX. [redacted] Tx. 77383-0340
Date: 6/3/13
Tech Name: [redacted]
Tech Cert # [redacted]

Test Equipment Used

Make/Model: LS-2003

Test Method Used

☐ AVO (RJ21) ☒ FTA (RJ20) ☐ FXT (RJ 061-272-1)

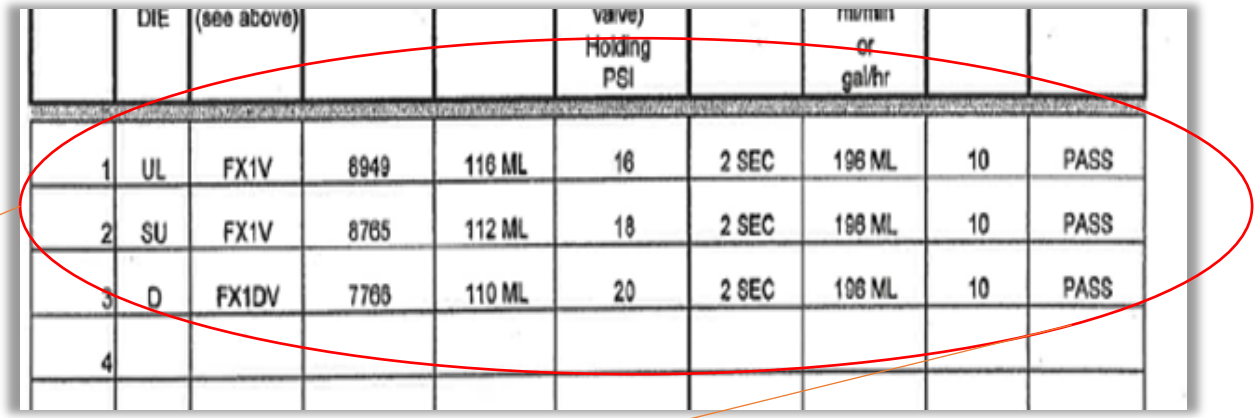
Type of Leak Detectors tested

☐ LDC ☐ XLP ☐ BFLD ☐ DLD ☐ PLD ☐ BFLD ☐ FX1
☐ FX1D ☐ FX2 ☐ FX2D ☐ FX1BFLD ☐ FX2BFLD ☒ FX1DV ☐ FX2DV
☒ FX1V ☐ FX2V ☐ OTHER

TEST INFORMATION

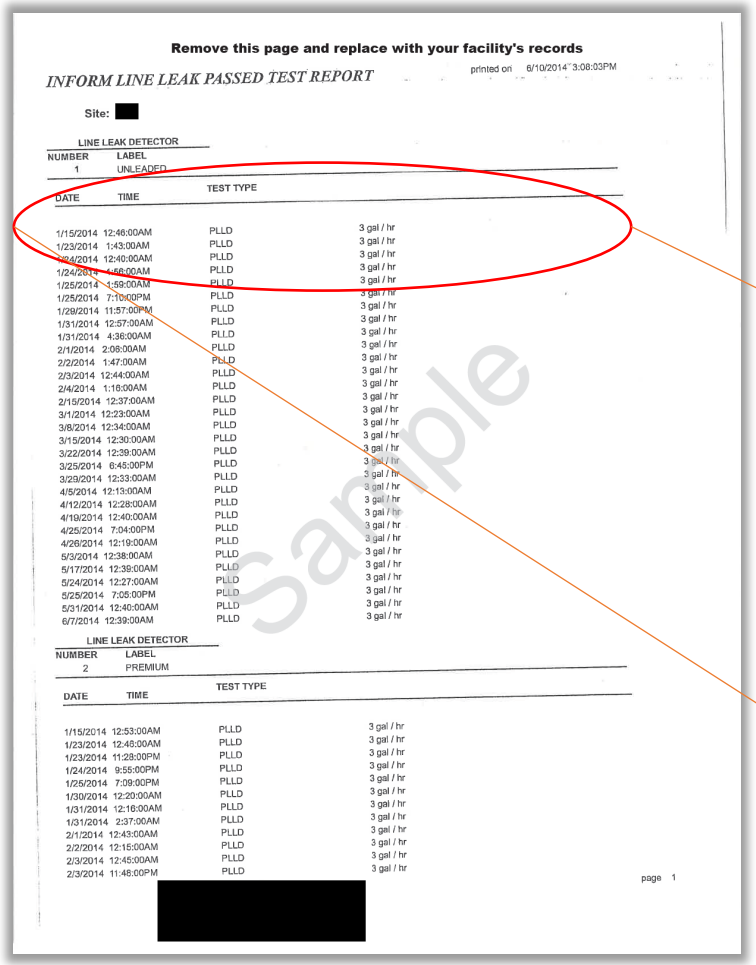
	UL UL+ SU DIE	Leak Detector Type (see above)	Serial Number	Resiliency (ml)	Func. Element (check valve) Holding PSI	Opening Time (sec)	Test Leak Rate ml/min or gal/hr	Metering PSI	Pass or Fail
1	UL	FX1V	6949	116 ML	16	2 SEC	196 ML	10	PASS
2	SU	FX1V	8765	112 ML	18	2 SEC	196 ML	10	PASS
3	D	FX1DV	7766	110 ML	20	2 SEC	196 ML	10	PASS
4									
5									
6									
7									
8									

Technician Signature [redacted] Date: 6/3/13



	DIE	(see above)			valve) Holding PSI		or gal/hr		
1	UL	FX1V	6949	116 ML	16	2 SEC	196 ML	10	PASS
2	SU	FX1V	8765	112 ML	18	2 SEC	196 ML	10	PASS
3	D	FX1DV	7766	110 ML	20	2 SEC	196 ML	10	PASS
4									

Automatic Line Leak Detector Test: Electronic



Remove this page and replace with your facility's records

INFORM LINE LEAK PASSED TEST REPORT

printed on 6/10/2014 3:08:03PM

Site: [redacted]

LINE LEAK DETECTOR

NUMBER	LABEL
1	UNLEADED

DATE	TIME	TEST TYPE	
1/15/2014	12:46:00AM	PLLD	3 gal / hr
1/23/2014	1:43:00AM	PLLD	3 gal / hr
1/24/2014	12:40:00AM	PLLD	3 gal / hr
1/24/2014	1:56:00AM	PLLD	3 gal / hr
1/25/2014	1:59:00AM	PLLD	3 gal / hr
1/25/2014	7:10:00PM	PLLD	3 gal / hr
1/29/2014	11:57:00PM	PLLD	3 gal / hr
1/31/2014	12:57:00AM	PLLD	3 gal / hr
1/31/2014	4:36:00AM	PLLD	3 gal / hr
2/1/2014	2:06:00AM	PLLD	3 gal / hr
2/2/2014	1:47:00AM	PLLD	3 gal / hr
2/3/2014	12:44:00AM	PLLD	3 gal / hr
2/4/2014	1:16:00AM	PLLD	3 gal / hr
2/15/2014	12:37:00AM	PLLD	3 gal / hr
3/1/2014	12:23:00AM	PLLD	3 gal / hr
3/8/2014	12:34:00AM	PLLD	3 gal / hr
3/15/2014	12:30:00AM	PLLD	3 gal / hr
3/22/2014	12:39:00AM	PLLD	3 gal / hr
3/25/2014	6:45:00PM	PLLD	3 gal / hr
3/29/2014	12:33:00AM	PLLD	3 gal / hr
4/5/2014	12:13:00AM	PLLD	3 gal / hr
4/12/2014	12:28:00AM	PLLD	3 gal / hr
4/19/2014	12:40:00AM	PLLD	3 gal / hr
4/25/2014	7:04:00PM	PLLD	3 gal / hr
4/26/2014	12:19:00AM	PLLD	3 gal / hr
5/3/2014	12:38:00AM	PLLD	3 gal / hr
5/17/2014	12:39:00AM	PLLD	3 gal / hr
5/24/2014	12:27:00AM	PLLD	3 gal / hr
5/25/2014	7:05:00PM	PLLD	3 gal / hr
5/31/2014	12:40:00AM	PLLD	3 gal / hr
6/7/2014	12:39:00AM	PLLD	3 gal / hr

LINE LEAK DETECTOR

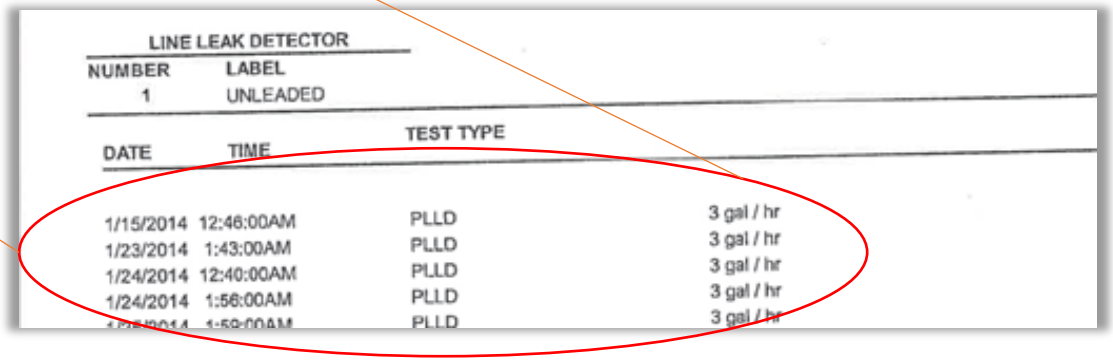
NUMBER	LABEL
2	PREMIUM

DATE	TIME	TEST TYPE	
1/15/2014	12:53:00AM	PLLD	3 gal / hr
1/23/2014	12:45:00AM	PLLD	3 gal / hr
1/23/2014	11:28:00PM	PLLD	3 gal / hr
1/24/2014	9:55:00PM	PLLD	3 gal / hr
1/25/2014	7:09:00PM	PLLD	3 gal / hr
1/30/2014	12:20:00AM	PLLD	3 gal / hr
1/31/2014	12:16:00AM	PLLD	3 gal / hr
1/31/2014	2:37:00AM	PLLD	3 gal / hr
2/1/2014	12:43:00AM	PLLD	3 gal / hr
2/2/2014	12:15:00AM	PLLD	3 gal / hr
2/3/2014	12:45:00AM	PLLD	3 gal / hr
2/3/2014	11:46:00PM	PLLD	3 gal / hr

[redacted]

page 1

Sample

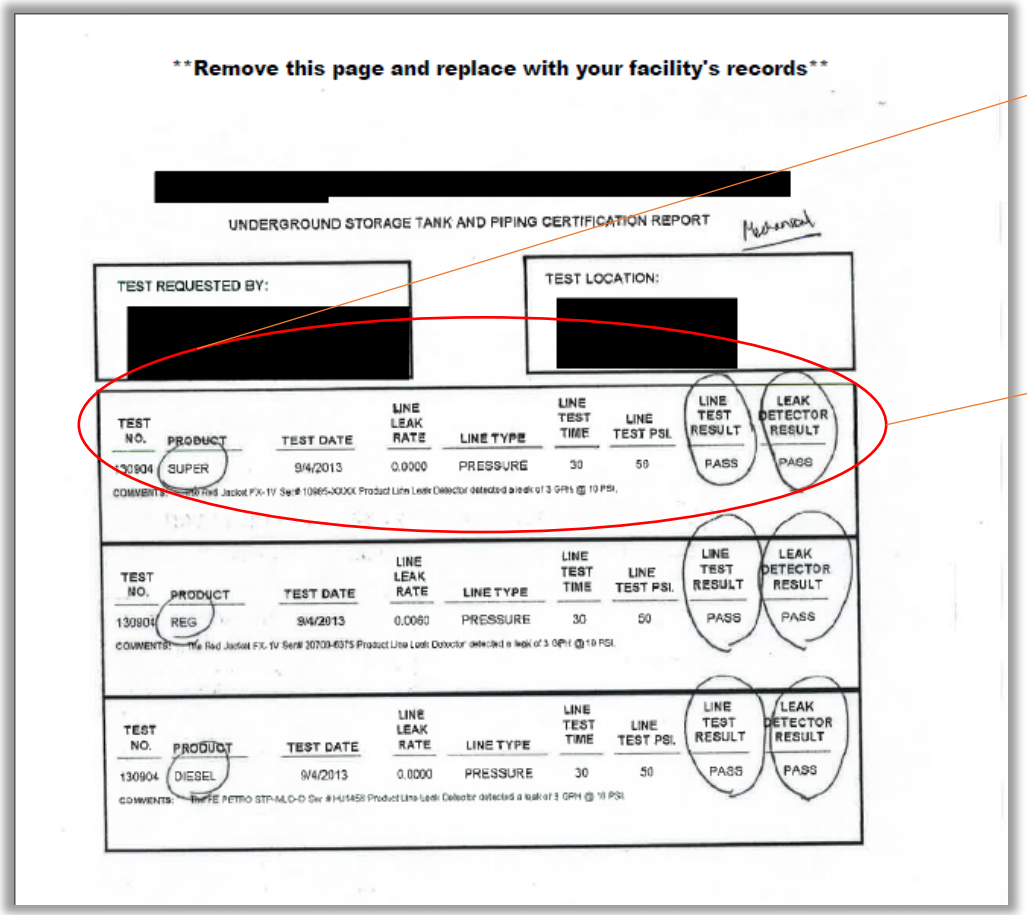


LINE LEAK DETECTOR

NUMBER	LABEL
1	UNLEADED

DATE	TIME	TEST TYPE	
1/15/2014	12:46:00AM	PLLD	3 gal / hr
1/23/2014	1:43:00AM	PLLD	3 gal / hr
1/24/2014	12:40:00AM	PLLD	3 gal / hr
1/24/2014	1:56:00AM	PLLD	3 gal / hr

Piping Tightness Test



Remove this page and replace with your facility's records

[redacted]

UNDERGROUND STORAGE TANK AND PIPING CERTIFICATION REPORT

TEST REQUESTED BY: [redacted]

TEST LOCATION: [redacted]

TEST NO.	PRODUCT	TEST DATE	LINE LEAK RATE	LINE TYPE	LINE TEST TIME	LINE TEST PSI	LINE TEST RESULT	LEAK DETECTOR RESULT
130904	SUPER	9/4/2013	0.0000	PRESSURE	30	50	PASS	PASS

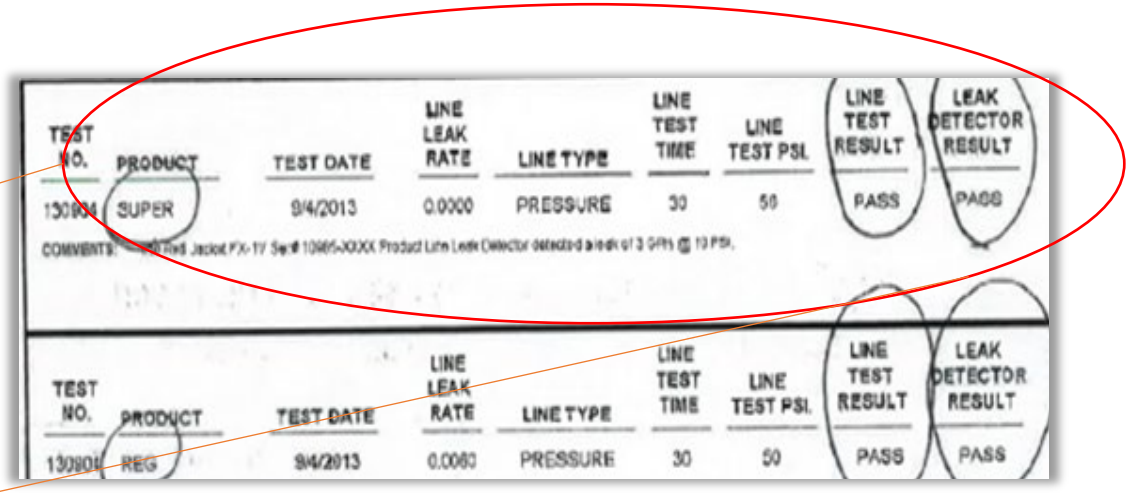
COMMENTS: [redacted] Red Jacket FX-1V Ser# 10665-XXXX Product Line Leak Detector detected a leak of 3 GPH @ 10 PSI.

TEST NO.	PRODUCT	TEST DATE	LINE LEAK RATE	LINE TYPE	LINE TEST TIME	LINE TEST PSI	LINE TEST RESULT	LEAK DETECTOR RESULT
130904	REG	9/4/2013	0.0000	PRESSURE	30	50	PASS	PASS

COMMENTS: [redacted] Red Jacket FX-1V Ser# 20709-6375 Product Line Leak Detector detected a leak of 3 GPH @ 10 PSI.

TEST NO.	PRODUCT	TEST DATE	LINE LEAK RATE	LINE TYPE	LINE TEST TIME	LINE TEST PSI	LINE TEST RESULT	LEAK DETECTOR RESULT
130904	DIESEL	9/4/2013	0.0000	PRESSURE	30	50	PASS	PASS

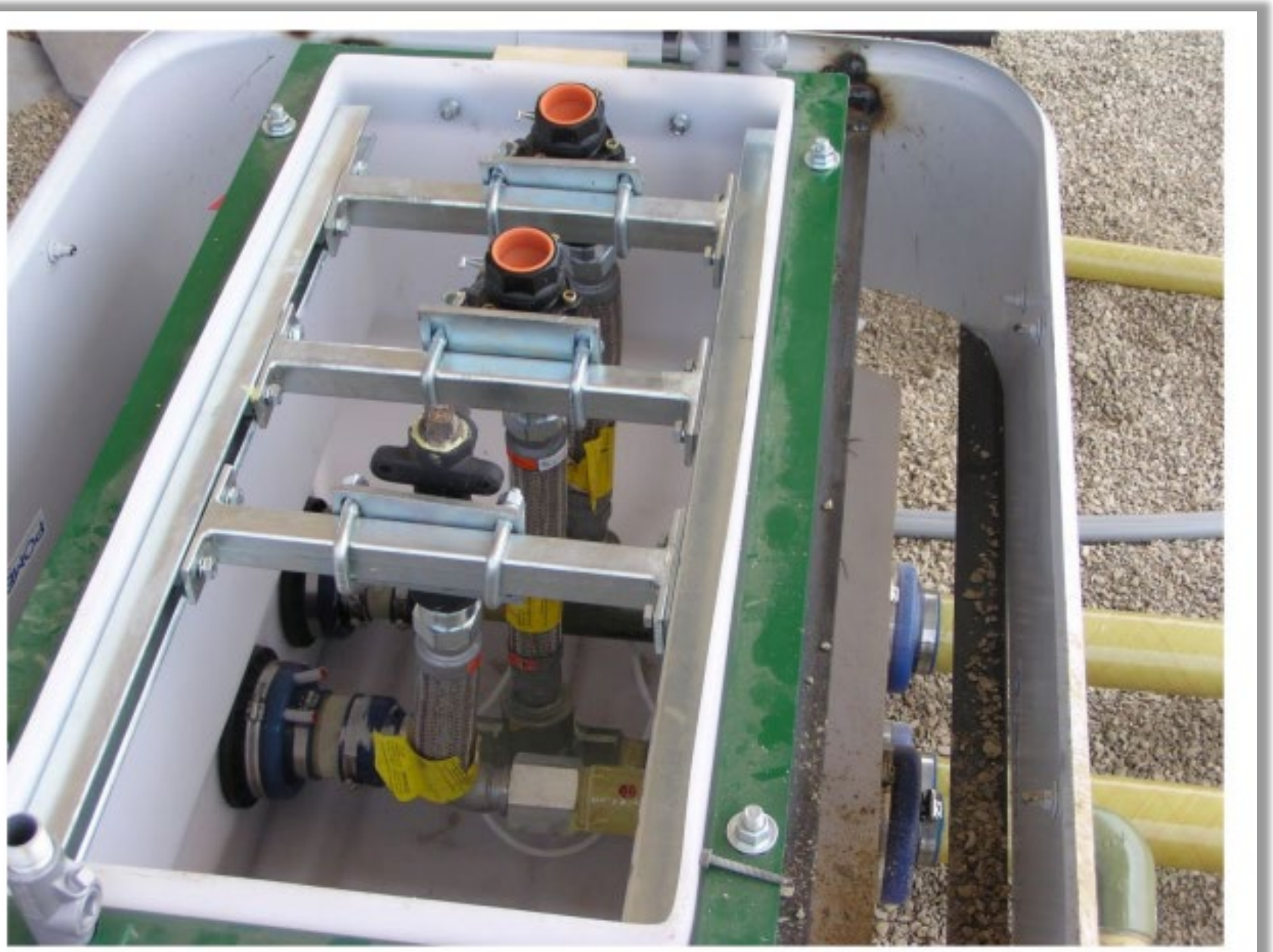
COMMENTS: [redacted] PETRO STP-MLG-D Ser # HU1458 Product Line Leak Detector detected a leak of 3 GPH @ 10 PSI.



TEST NO.	PRODUCT	TEST DATE	LINE LEAK RATE	LINE TYPE	LINE TEST TIME	LINE TEST PSI	LINE TEST RESULT	LEAK DETECTOR RESULT
130904	SUPER	9/4/2013	0.0000	PRESSURE	30	50	PASS	PASS

COMMENTS: [redacted] Red Jacket FX-1V Ser# 10665-XXXX Product Line Leak Detector detected a leak of 3 GPH @ 10 PSI.

TEST NO.	PRODUCT	TEST DATE	LINE LEAK RATE	LINE TYPE	LINE TEST TIME	LINE TEST PSI	LINE TEST RESULT	LEAK DETECTOR RESULT
130904	REG	9/4/2013	0.0000	PRESSURE	30	50	PASS	PASS



Overfill Device and Spill Prevention Equipment

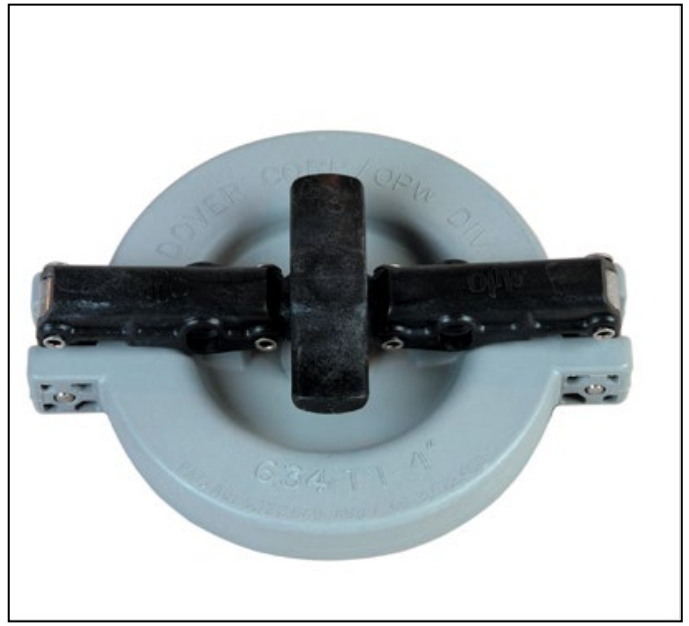


Table 6. Spill and Overfill Equipment Record Requirements

Type of Equipment	Required Records	Frequency
Spill bucket	Inspection logs and either proof of double-walled construction or tightness test results.	Every 30 days for inspections. Every 3 years for tightness testing.
Containment sumps and manways used for secondary containment	Inspection logs and proof of double-walled construction or tightness test results.	Every 30 days for inspections. Every 3 years for tightness testing.
All containment sumps	Walkthrough inspection logs.	Every year
All spill prevention equipment	Repair records and their test results. Records showing you removed any debris, contaminated water, and fuel within 96 hours of discovery and showing its proper disposal.	Within 30 days of repairs. As needed for cleaning and disposal.
Automatic shutoff device[k]	Installation records, repair records and their test results, and test results showing the device is set to activate at the appropriate level.	Within 30 days of repairs. Every 3 years for activation tests.
Flow restrictor[l]	Test results showing the device is set to activate at the appropriate level and records showing change in service from flow restrictor to automatic shutoff device[m] if replaced.	Every 3 years for activation tests.

k. Find automatic shutoff devices in the fill port.
l. Find flow restrictors in the vent line.
m. Flow restrictors cannot be used if you install or replace overfill equipment on or after September 1, 2018.

Spill Prevention Equipment Requirements

- Tight fill fitting
- Liquid tight spill bucket
  - Walkthrough inspections every 30 days
    - Visually inspect
    - Remove debris and liquid within 96 hours
  - Tightness tested every 3 years

  OR
  - *Double-walled and inspect every 30 days

Spill Prevention Equipment Requirements

- All containment sumps:
  - Walkthrough inspections conducted every year
- All spill prevention equipment must be tested within 30 days of repairs

- Containment Sumps with Interstitial Monitoring as primary release detection method
  - *Test for liquid tightness every 3 years

  OR
  - *Double-walled and inspect every 30 days

Spill Prevention Equipment Records

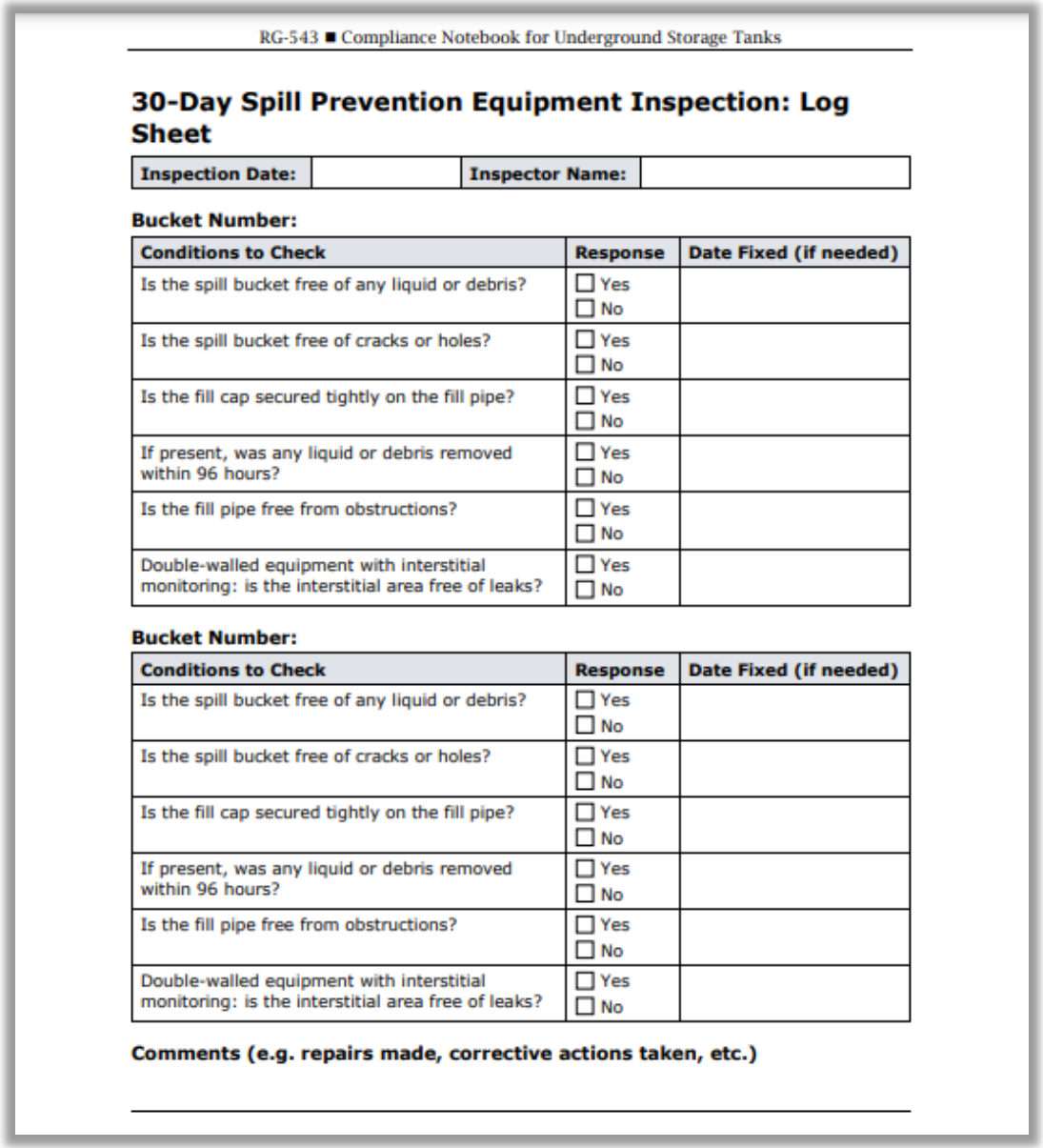
- Spill prevention equipment:
  - Spill equipment inspection
  - Records/ waste documentation for spill
  - Testing records if not double walled
- Sumps
  - Annual walkthrough inspection log
  - Waste disposal records/manifests
  - Testing records if not double walled

Additional Spill Prevention Equipment Requirements

- Wastewater disposal options from triennial testing
  - Pump and Haul
  - Hydrostatic Test Water General Permit (GP)
  - Petroleum Fuel or Petroleum Substances GP

- See TCEQ's webpage: *Available Water Quality General Permits:* *https://www.tceq.texas.gov/permitting/wastewater/general*

30-Day Spill Bucket Inspection Log



30-Day Spill Prevention Equipment Inspection: Log Sheet

Inspection Date:		Inspector Name:	

Bucket Number:

Conditions to Check	Response	Date Fixed (if needed)
Is the spill bucket free of any liquid or debris?	☐ Yes ☐ No	
Is the spill bucket free of cracks or holes?	☐ Yes ☐ No	
Is the fill cap secured tightly on the fill pipe?	☐ Yes ☐ No	
If present, was any liquid or debris removed within 96 hours?	☐ Yes ☐ No	
Is the fill pipe free from obstructions?	☐ Yes ☐ No	
Double-walled equipment with interstitial monitoring: is the interstitial area free of leaks?	☐ Yes ☐ No	

Bucket Number:

Conditions to Check	Response	Date Fixed (if needed)
Is the spill bucket free of any liquid or debris?	☐ Yes ☐ No	
Is the spill bucket free of cracks or holes?	☐ Yes ☐ No	
Is the fill cap secured tightly on the fill pipe?	☐ Yes ☐ No	
If present, was any liquid or debris removed within 96 hours?	☐ Yes ☐ No	
Is the fill pipe free from obstructions?	☐ Yes ☐ No	
Double-walled equipment with interstitial monitoring: is the interstitial area free of leaks?	☐ Yes ☐ No	

Comments (e.g. repairs made, corrective actions taken, etc.)

Annual Sump Inspection

Annual Sump Inspection: Log Sheet

Inspection Date:		Inspector Name:	

Sump Number:

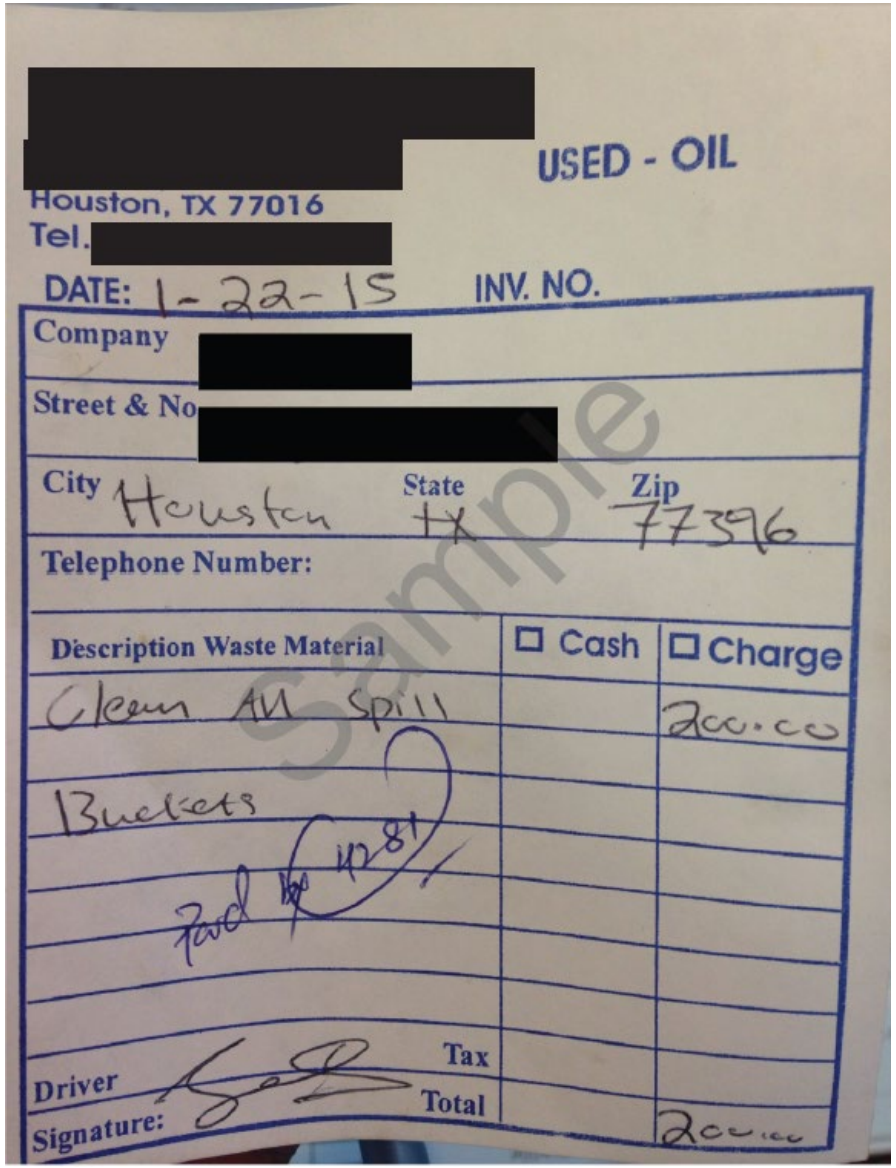
Conditions to Check	Response	Date Fixed (if needed)
Any damage to the sump or equipment?	☐ Yes ☐ No	
Any leaks in the containment area?	☐ Yes ☐ No	
Any releases to the environment?	☐ Yes ☐ No	
Any regulated substances in the sump?	☐ Yes ☐ No	
If present, was any liquid or debris removed within 96 hours?	☐ Yes ☐ No	
Cathodic protection present and working??	☐ Yes ☐ No	

Sump Number:

Conditions to Check	Response	Date Fixed (if needed)
Any damage to the sump or equipment?	☐ Yes ☐ No	
Any leaks in the containment area?	☐ Yes ☐ No	
Any releases to the environment?	☐ Yes ☐ No	
Any regulated substances in the sump?	☐ Yes ☐ No	
If present, was any liquid or debris removed within 96 hours?	☐ Yes ☐ No	
Cathodic protection present and working?	☐ Yes ☐ No	

Comments (e.g., repairs made, corrective actions taken, etc.)

Waste Manifest for Spill Bucket Waste



[redacted]
USED - OIL
Houston, TX 77016
Tel. [redacted]
DATE: 1-22-15 INV. NO.
Company [redacted]
Street & No [redacted]
City Houston State TX Zip 77396
Telephone Number:

Description Waste Material	☐ Cash	☐ Charge
Clean All Spill		200.00
Buckets		
Tax		
Total		200.00

Driver
Signature:

Sample

Overfill Device Requirements

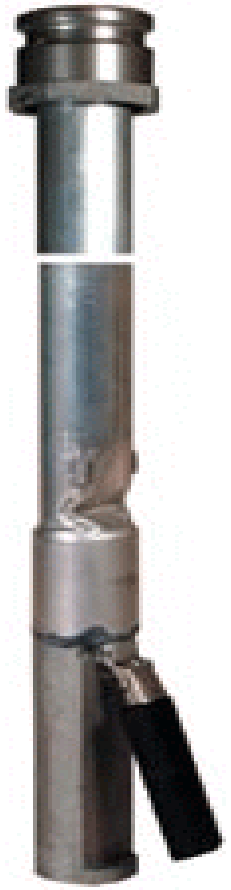
- Automatic shutoff

OR

- Flow restrictor (ball floats)
  - Ball floats not allowed to be repaired or replaced at existing UST systems after September 1, 2018

- Overfill device triennial test to ensure activation at the correct level (January 1, 2021)

Overfill Device Records



- Automatic shutoff device
  - Visually verifiable by investigator
  - Installation records
  - Repairs records
  - Triennial test results
- Flow restrictor
  - Installation records
  - Triennial test results
  - May not be installed or replaced after Sep 1, 2018

Release Reporting

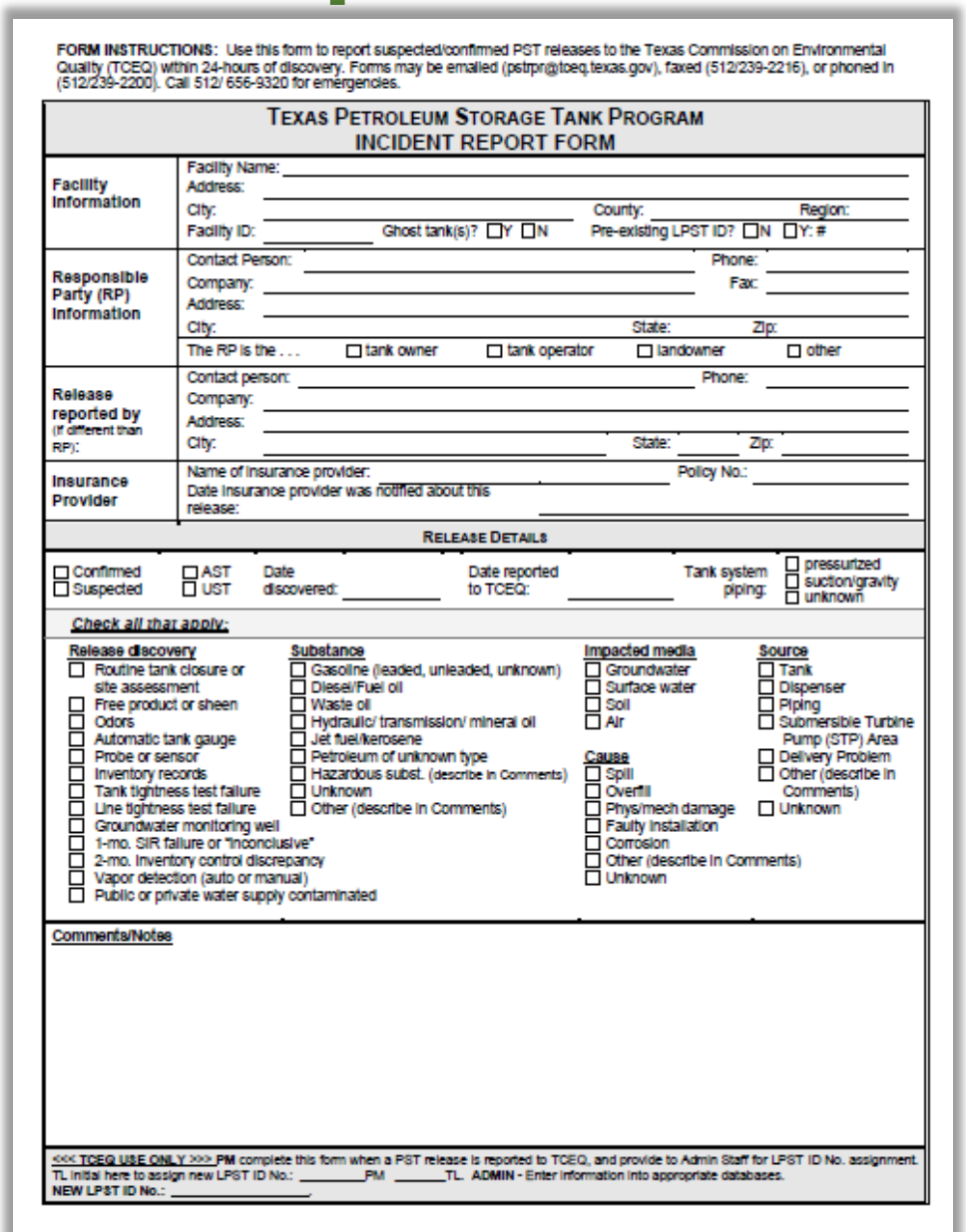
Release Reporting Requirements

- Suspected Releases:
  - Report within 24 hours to TCEQ's Remediation Division:
    - Date of suspected release
    - Date the owner/operator became aware of the suspected release
    - Date reported to TCEQ
    - Results of investigation
  - Investigate
    - Conduct a system tightness test or site check sampling within 30 days
  - Submit Release Determination Report within 45 days with results

Release Reporting Records

- Reported to TCEQ within 24 hours of discovery
  - Incident report form submit by fax or email
- Documentation of system tightness test or site check
  - Conducted within 30 days of discovery
- Submitted Release Determination Report within 45 days of discovery
- Keep records for at least 5 years

Incident Report Form - 20097



FORM INSTRUCTIONS: Use this form to report suspected/confirmed PST releases to the Texas Commission on Environmental Quality (TCEQ) within 24-hours of discovery. Forms may be emailed (pstrpr@tceq.texas.gov), faxed (512/239-2216), or phoned in (512/239-2200). Call 512/ 656-9320 for emergencies.

TEXAS PETROLEUM STORAGE TANK PROGRAM
INCIDENT REPORT FORM

Facility Information

Facility Name: _____
Address: _____
City: _____ County: _____ Region:
Facility ID: _____ Ghost tank(s)? ☐Y ☐N Pre-existing LPST ID? ☐N ☐Y: #

Responsible Party (RP) Information

Contact Person: _____ Phone: _____
Company: _____ Fax: _____
Address: _____
City: _____ State: Zip:
The RP is the . . . ☐ tank owner ☐ tank operator ☐ landowner ☐ other

Release reported by (if different than RP):

Contact person: _____ Phone: _____
Company: _____
Address: _____
City: _____ State: _____ Zip: _____

Insurance Provider

Name of insurance provider: _____ Policy No.: _____
Date insurance provider was notified about this release: _____

RELEASE DETAILS

☐ Confirmed ☐ Suspected ☐ AST ☐ UST Date discovered: _____ Date reported to TCEQ: _____ Tank system piping: ☐ pressurized ☐ suction/gravity ☐ unknown

Check all that apply:

Release discovery
- ☐ Routine tank closure or site assessment
- ☐ Free product or sheen
- ☐ Odors
- ☐ Automatic tank gauge
- ☐ Probe or sensor
- ☐ Inventory records
- ☐ Tank tightness test failure
- ☐ Line tightness test failure
- ☐ Groundwater monitoring well
- ☐ 1-mo. SIR failure or "inconclusive"
- ☐ 2-mo. inventory control discrepancy
- ☐ Vapor detection (auto or manual)
- ☐ Public or private water supply contaminated

Substance
- ☐ Gasoline (leaded, unleaded, unknown)
- ☐ Diesel/Fuel oil
- ☐ Waste oil
- ☐ Hydraulic/ transmission/ mineral oil
- ☐ Jet fuel/kerosene
- ☐ Petroleum of unknown type
- ☐ Hazardous subst. (describe in Comments)
- ☐ Unknown
- ☐ Other (describe in Comments)

Impacted media
- ☐ Groundwater
- ☐ Surface water
- ☐ Soil
- ☐ Air

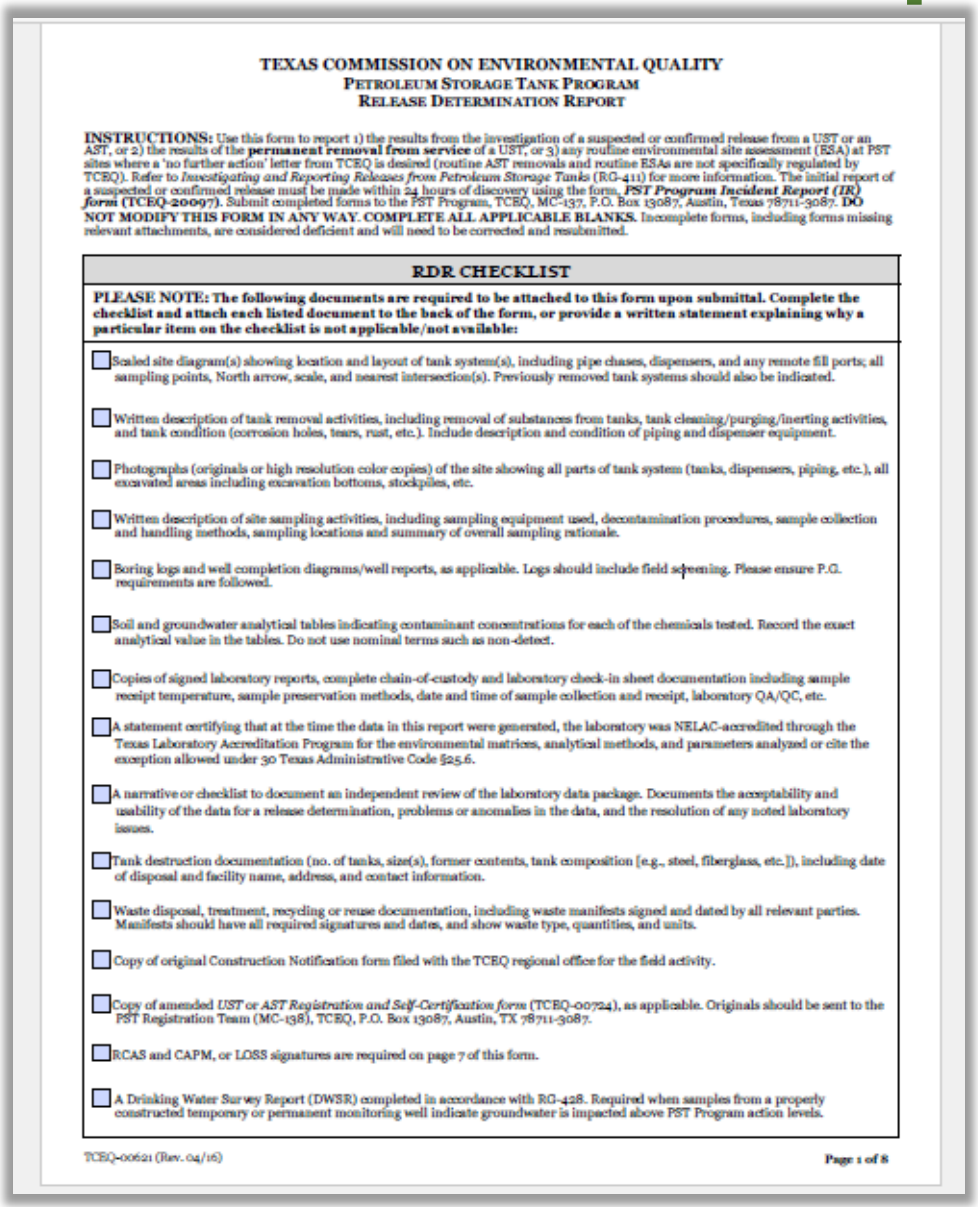
Cause
- ☐ Spill
- ☐ Overfill
- ☐ Phys/mech damage
- ☐ Faulty installation
- ☐ Corrosion
- ☐ Other (describe in Comments)
- ☐ Unknown

Source
- ☐ Tank
- ☐ Dispenser
- ☐ Piping
- ☐ Submersible Turbine Pump (STP) Area
- ☐ Delivery Problem
- ☐ Other (describe in Comments)
- ☐ Unknown

Comments/Notes

<<< TCEQ USE ONLY >>> PM complete this form when a PST release is reported to TCEQ, and provide to Admin Staff for LPST ID No. assignment. TL initial here to assign new LPST ID No.: _____PM _____TL. ADMIN - Enter information into appropriate databases.
NEW LPST ID No.: _____

Release Determination Report-0621



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
PETROLEUM STORAGE TANK PROGRAM
RELEASE DETERMINATION REPORT

INSTRUCTIONS: Use this form to report 1) the results from the investigation of a suspected or confirmed release from a UST or an AST, or 2) the results of the **permanent removal from service** of a UST, or 3) any routine environmental site assessment (RSA) at PST sites where a 'no further action' letter from TCEQ is desired (routine AST removals and routine RSAs are not specifically regulated by TCEQ). Refer to *Investigating and Reporting Releases from Petroleum Storage Tanks* (RG-411) for more information. The initial report of a suspected or confirmed release must be made within 24 hours of discovery using the form, ***PST Program Incident Report (IR) form*** **(TCEQ-20097).** Submit completed forms to the PST Program, TCEQ, MC-137, P.O. Box 13087, Austin, Texas 78711-3087. **DO NOT MODIFY THIS FORM IN ANY WAY. COMPLETE ALL APPLICABLE BLANKS.** Incomplete forms, including forms missing relevant attachments, are considered deficient and will need to be corrected and resubmitted.

RDR CHECKLIST

PLEASE NOTE: The following documents are required to be attached to this form upon submittal. Complete the checklist and attach each listed document to the back of the form, or provide a written statement explaining why a particular item on the checklist is not applicable/not available:

- ☐ Scaled site diagram(s) showing location and layout of tank system(s), including pipe chases, dispensers, and any remote fill ports; all sampling points, North arrow, scale, and nearest intersection(s). Previously removed tank systems should also be indicated.
- ☐ Written description of tank removal activities, including removal of substances from tanks, tank cleaning/purging/inerting activities, and tank condition (corrosion holes, tears, rust, etc.). Include description and condition of piping and dispenser equipment.
- ☐ Photographs (originals or high resolution color copies) of the site showing all parts of tank system (tanks, dispensers, piping, etc.), all excavated areas including excavation bottoms, stockpiles, etc.
- ☐ Written description of site sampling activities, including sampling equipment used, decontamination procedures, sample collection and handling methods, sampling locations and summary of overall sampling rationale.
- ☐ Boring logs and well completion diagrams/well reports, as applicable. Logs should include field screening. Please ensure P.G. requirements are followed.
- ☐ Soil and groundwater analytical tables indicating contaminant concentrations for each of the chemicals tested. Record the exact analytical value in the tables. Do not use nominal terms such as non-detect.
- ☐ Copies of signed laboratory reports, complete chain-of-custody and laboratory check-in sheet documentation including sample receipt temperature, sample preservation methods, date and time of sample collection and receipt, laboratory QA/QC, etc.
- ☐ A statement certifying that at the time the data in this report were generated, the laboratory was NELAC-accredited through the Texas Laboratory Accreditation Program for the environmental matrices, analytical methods, and parameters analyzed or cite the exception allowed under 30 Texas Administrative Code §25.6.
- ☐ A narrative or checklist to document an independent review of the laboratory data package. Documents the acceptability and usability of the data for a release determination, problems or anomalies in the data, and the resolution of any noted laboratory issues.
- ☐ Tank destruction documentation (no. of tanks, size(s), former contents, tank composition [e.g., steel, fiberglass, etc.]), including date of disposal and facility name, address, and contact information.
- ☐ Waste disposal, treatment, recycling or reuse documentation, including waste manifests signed and dated by all relevant parties. Manifests should have all required signatures and dates, and show waste type, quantities, and units.
- ☐ Copy of original Construction Notification form filed with the TCEQ regional office for the field activity.
- ☐ Copy of amended *UST or AST Registration and Self-Certification form* (TCEQ-00724), as applicable. Originals should be sent to the PST Registration Team (MC-138), TCEQ, P.O. Box 13087, Austin, TX 78711-3087.
- ☐ RCAS and CAPM, or LOSS signatures are required on page 7 of this form.
- ☐ A Drinking Water Survey Report (DWSR) completed in accordance with RG-428. Required when samples from a properly constructed temporary or permanent monitoring well indicate groundwater is impacted above PST Program action levels.

TCEQ-00621 (Rev. 04/16) **Page 1 of 8**

Construction and Maintenance

Construction and Maintenance Requirements

Construction notification form TCEQ-0495

- Installing tanks or piping
- Removing USTs or returning to service
- Repairing, upgrading, or improving UST
- Integrity assessment
- Entering a UST

Construction and Maintenance Records

- Copies of Construction notifications
- Receipts and invoices for repairs and maintenance
- Installation records
- Keep records for 5 years

Construction Notification Acknowledgement Letter

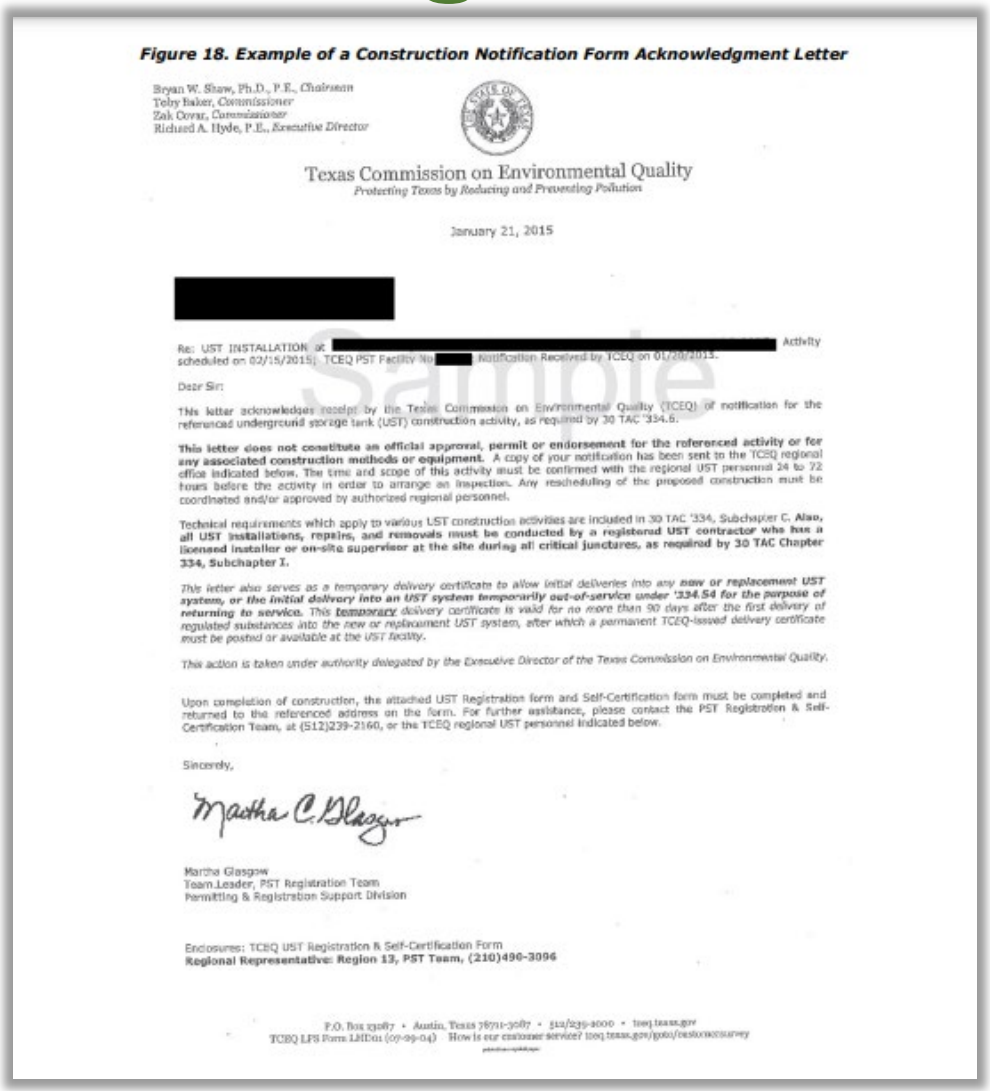


Figure 18. Example of a Construction Notification Form Acknowledgment Letter

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Zak Covar, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*

Texas Commission on Environmental Quality
Protecting Texas by Reducing and Preventing Pollution

January 21, 2015

[redacted]

Re: UST INSTALLATION at [redacted] Activity scheduled on 02/15/2015; TCEQ PST Facility No. [redacted] Notification Received by TCEQ on 01/20/2015.

Dear Sir:

This letter acknowledges receipt by the Texas Commission on Environmental Quality (TCEQ) of notification for the referenced underground storage tank (UST) construction activity, as required by 30 TAC 334.6.

This letter does not constitute an official approval, permit or endorsement for the referenced activity or for any associated construction methods or equipment. A copy of your notification has been sent to the TCEQ regional office indicated below. The time and scope of this activity must be confirmed with the regional UST personnel 24 to 72 hours before the activity in order to arrange an inspection. Any rescheduling of the proposed construction must be coordinated and/or approved by authorized regional personnel.

Technical requirements which apply to various UST construction activities are included in 30 TAC 334, Subchapter C. **Also, all UST installations, repairs, and removals must be conducted by a registered UST contractor who has a licensed installer or on-site supervisor at the site during all critical junctures, as required by 30 TAC Chapter 334, Subchapter I.**

This letter also serves as a temporary delivery certificate to allow initial deliveries into any ***new or replacement UST system, or the initial delivery into an UST system temporarily out-of-service under §334.54 for the purpose of returning to service.*** *This* ***temporary*** *delivery certificate is valid for no more than 90 days after the first delivery of regulated substances into the new or replacement UST system, after which a permanent TCEQ-issued delivery certificate must be posted or available at the UST facility.*

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Upon completion of construction, the attached UST Registration form and Self-Certification form must be completed and returned to the referenced address on the form. For further assistance, please contact the PST Registration & Self-Certification Team, at (512)239-2160, or the TCEQ regional UST personnel indicated below.

Sincerely,

Martha C. Glasgow

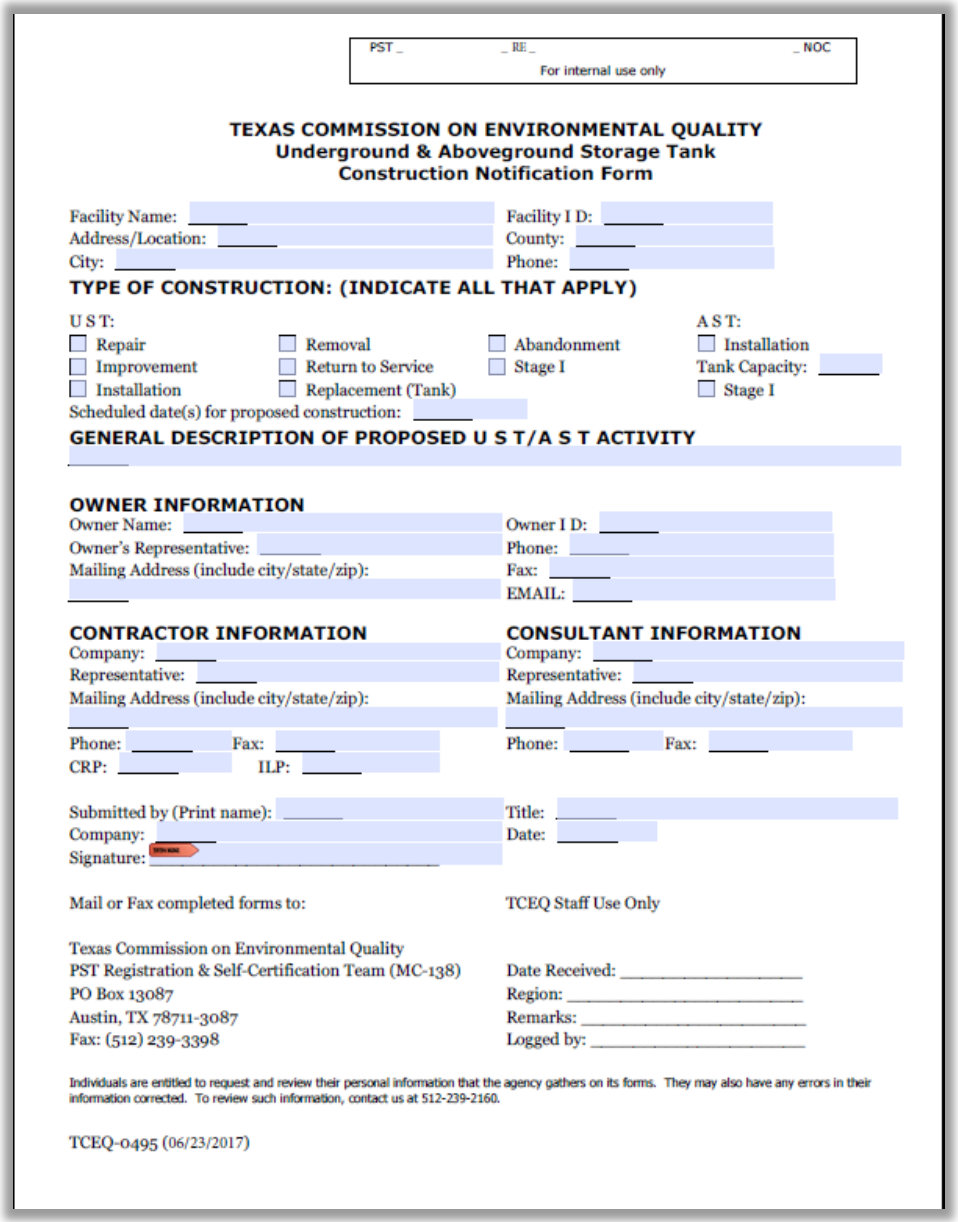
Martha Glasgow
Team Leader, PST Registration Team
Permitting & Registration Support Division

Enclosures: TCEQ UST Registration & Self-Certification Form
Regional Representative: Region 13, PST Team, (210)490-3096

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-4000 • tceq.texas.gov
TCEQ LPS Form LBIDoc (09-09-04) How is our customer service? tceq.texas.gov/goto/customersurvey

Sample

Construction Notification Form- 0495



PST _ _ RE _ _ NOC
For internal use only

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Underground & Aboveground Storage Tank
Construction Notification Form

Facility Name: _____ Facility I D: _____
Address/Location: _____ County: _____
City: _____ Phone: _____

TYPE OF CONSTRUCTION: (INDICATE ALL THAT APPLY)

U S T:
☐ Repair ☐ Removal ☐ Abandonment
☐ Improvement ☐ Return to Service ☐ Stage I
☐ Installation ☐ Replacement (Tank)

A S T:
☐ Installation
Tank Capacity: _____
☐ Stage I

Scheduled date(s) for proposed construction: _____

GENERAL DESCRIPTION OF PROPOSED U S T/A S T ACTIVITY

_____

OWNER INFORMATION

Owner Name: _____ Owner I D: _____
Owner's Representative: _____ Phone: _____
Mailing Address (include city/state/zip): Fax: _____
_____ EMAIL: _____

CONTRACTOR INFORMATION

Company: _____
Representative: _____
Mailing Address (include city/state/zip):
_____
Phone: _____ Fax: _____
CRP: _____ ILP: _____

CONSULTANT INFORMATION

Company: _____
Representative: _____
Mailing Address (include city/state/zip):
_____
Phone: _____ Fax: _____

Submitted by (Print name): _____ Title: _____
Company: _____ Date: _____
Signature: _____

Mail or Fax completed forms to:

Texas Commission on Environmental Quality
PST Registration & Self-Certification Team (MC-138)
PO Box 13087
Austin, TX 78711-3087
Fax: (512) 239-3398

TCEQ Staff Use Only

Date Received: _____
Region: _____
Remarks: _____
Logged by: _____

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-2160.

TCEQ-0495 (06/23/2017)

Operator Training

Operator Training Records

Applicable Regulations: 30 TAC 334.10 and 30 TAC 334 Subchapter N

Train Your Operators

You must have at least one trained A, B, and C operator for each UST facility, and one certified operator must be present during hours of operation.

Unmanned UST systems, such as card access fueling stations or emergency generators, must keep weather-resistant signs visible from any dispenser that includes:

- Procedures for addressing a surface spill
- Location of an emergency shutoff button
- A 24-hour contact phone number for the A/B operator
- When to call "911"

Find information in our guide to training for UST operators[33] (RG-475o) and approved UST training courses[34] on our website.

Keep Records

Include copies of:

- Current A/B operator certificate issued by a TCEQ-approved training provider.
- Current list of C operators trained for your facility and the date of their latest training.
- If your facility was determined to be in significant noncompliance, keep documentation of re-training.
- If applicable, documentation that a third-party designated class B operator holds a current A or A/B license and is employed by a registered UST contractor.
  - Include a signed agreement between the A/B operator and facility owner or operator.

Keep all records for **at least 5 years**.

Attachments

1. *Figure 19. Example of Current A/B Operator Training Certificate*
2. *"C" Operator Training Log Sheet*

Operator Training Requirements

- Train and designate A/B and C operators for each facility
  - List of approved A/B operator training courses: https://www.tceq.texas.gov/remediation/pst_rp/ust_training
  - Training certificate expires after 3 years
- All operators must know:
  - Procedures for addressing a spill
  - Location of emergency shut off
  - Contact information for the A/B operator
  - When to call “911”

Operator Training Records

- A/B Operator certificate
- Current list of C operators
- Ensure at least one certified operator on site during hours of operation

- Unmanned facilities must keep weather-resistant signs:
  - Procedures for addressing a spill
  - Location of emergency shutoff button
  - When to call “911”
  - Contact information for the A/B Operator

Additional Operator Training Records

- Documentation of re-training
  - If applicable and if facility was previously determined to be in significant noncompliance

- If a licensed UST contractor is serving as your facility's A/B Operator, you need a signed agreement

A/B Operator Training Certification


PASS
Training & Compliance

CERTIFICATE
OF TRAINING

[redacted]

Has successfully completed

Texas UST Class A/B Operator Training

Issued on:
02-08-2022

Expires 02-08-2025

[redacted]

Trainer

[redacted]

P.O. Box 2353, Muncie, IN 47307 • passtesting.com • 765-281-5588

passtesting.com/verify • Certificate # 604637

“C” Operator Training Log Sheet

Class C Operator Training Log Sheet

By signing this document, I acknowledge that I received Class C Operator training by a qualified Class A/B Operator[35] and understand my function as a Class C Operator.[36] I also understand that Class C Operators must be retrained within 3 years of the training date below[37] and this training only applies to the specific facility the training was provided for.

Date	Trainee Name	Trainee Signature	Trainer Name	Trainer Signature

Temporarily Out of Service (TOOS)

Requirements for all TOOS

- Update PST registration within 30 days
- Keep vent lines open and functioning
- Ensure tank system is locked/secured
- Maintain corrosion protection
- Operator Training
- Financial assurance unless:
  - Tank is empty – documentation **and**
  - A site check and necessary corrective actions have been performed according to release investigation and confirmation steps

Requirements for Not Empty TOOS

- Not Empty, Temporarily Out of Service Tanks also need:
  - Annual Self-Certification and Registration
  - Release Detection records
  - Report Suspected Releases

TOOS Records

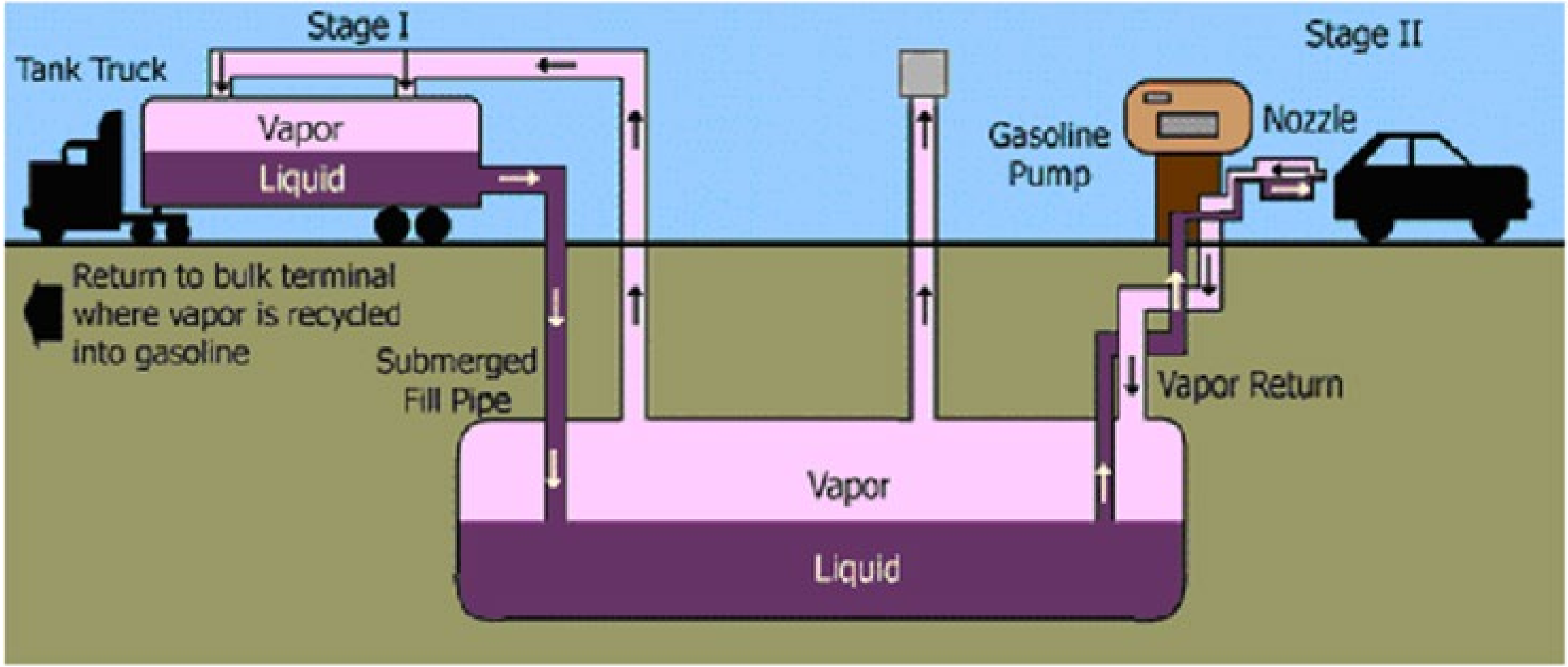
Empty

- Corrosion Protection
- Operator Training
- Empty Documentation
- *Financial Assurance
  - No financial assurance if site check was completed
  - Documentation of Site Check

Not Empty

- Corrosion Protection
- Operator Training
- Financial Assurance
- Annual Self Certification
- Release detection records
- Report Suspected Releases

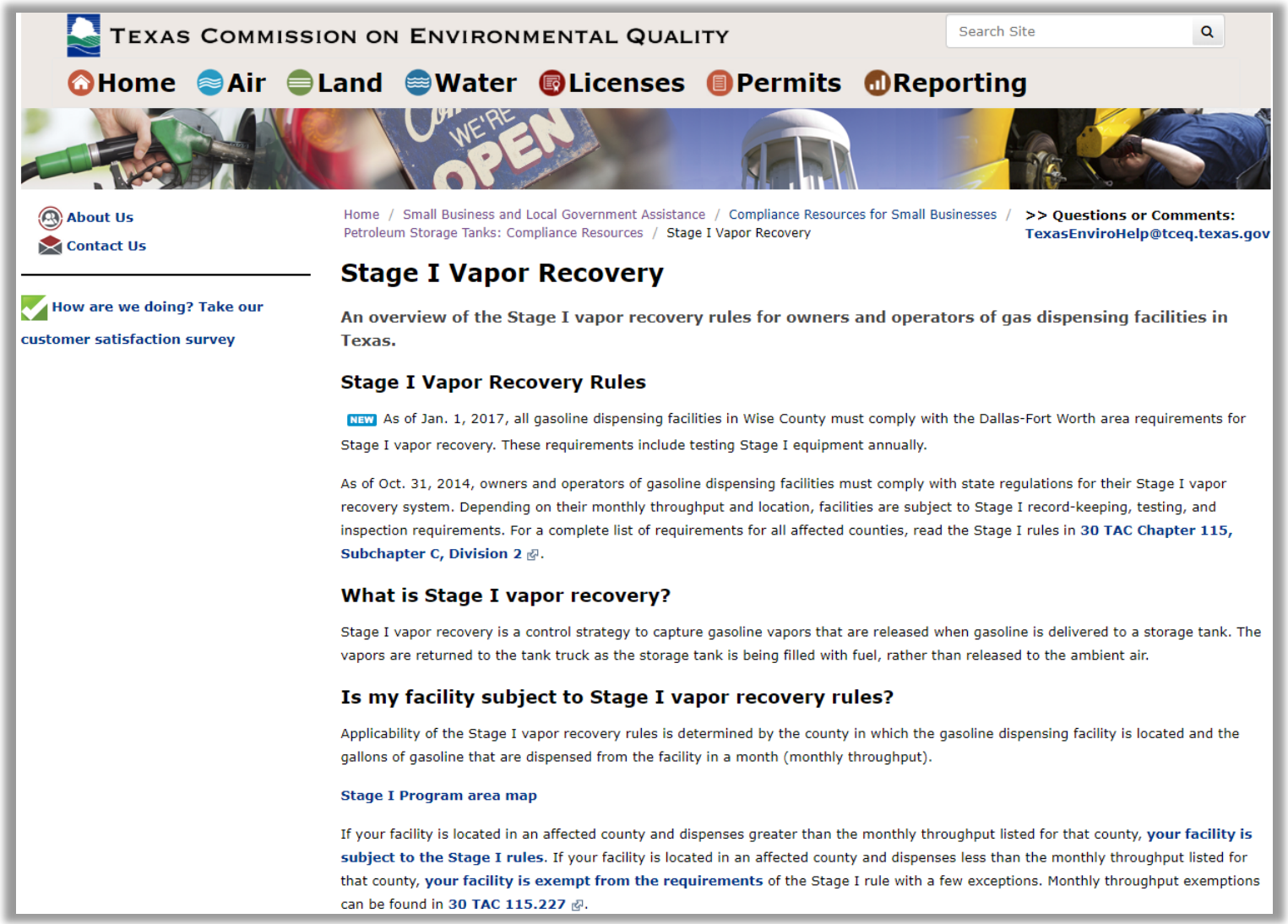
Stage I and Stage II Vapor Recovery



Stage I and Stage II Requirements

- Gasoline Dispensing Facilities
- Applicability determined by facility's location and monthly throughput
- Inspections during deliveries
- Submerged fill tube
- Annual testing
- 6C certification

Stage I Vapor Recovery Webpage



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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Home / Small Business and Local Government Assistance / Compliance Resources for Small Businesses / Petroleum Storage Tanks: Compliance Resources / Stage I Vapor Recovery

>> Questions or Comments: TexasEnviroHelp@tceq.texas.gov

Stage I Vapor Recovery

An overview of the Stage I vapor recovery rules for owners and operators of gas dispensing facilities in Texas.

Stage I Vapor Recovery Rules

NEW As of Jan. 1, 2017, all gasoline dispensing facilities in Wise County must comply with the Dallas-Fort Worth area requirements for Stage I vapor recovery. These requirements include testing Stage I equipment annually.

As of Oct. 31, 2014, owners and operators of gasoline dispensing facilities must comply with state regulations for their Stage I vapor recovery system. Depending on their monthly throughput and location, facilities are subject to Stage I record-keeping, testing, and inspection requirements. For a complete list of requirements for all affected counties, read the Stage I rules in **30 TAC Chapter 115, Subchapter C, Division 2**.

What is Stage I vapor recovery?

Stage I vapor recovery is a control strategy to capture gasoline vapors that are released when gasoline is delivered to a storage tank. The vapors are returned to the tank truck as the storage tank is being filled with fuel, rather than released to the ambient air.

Is my facility subject to Stage I vapor recovery rules?

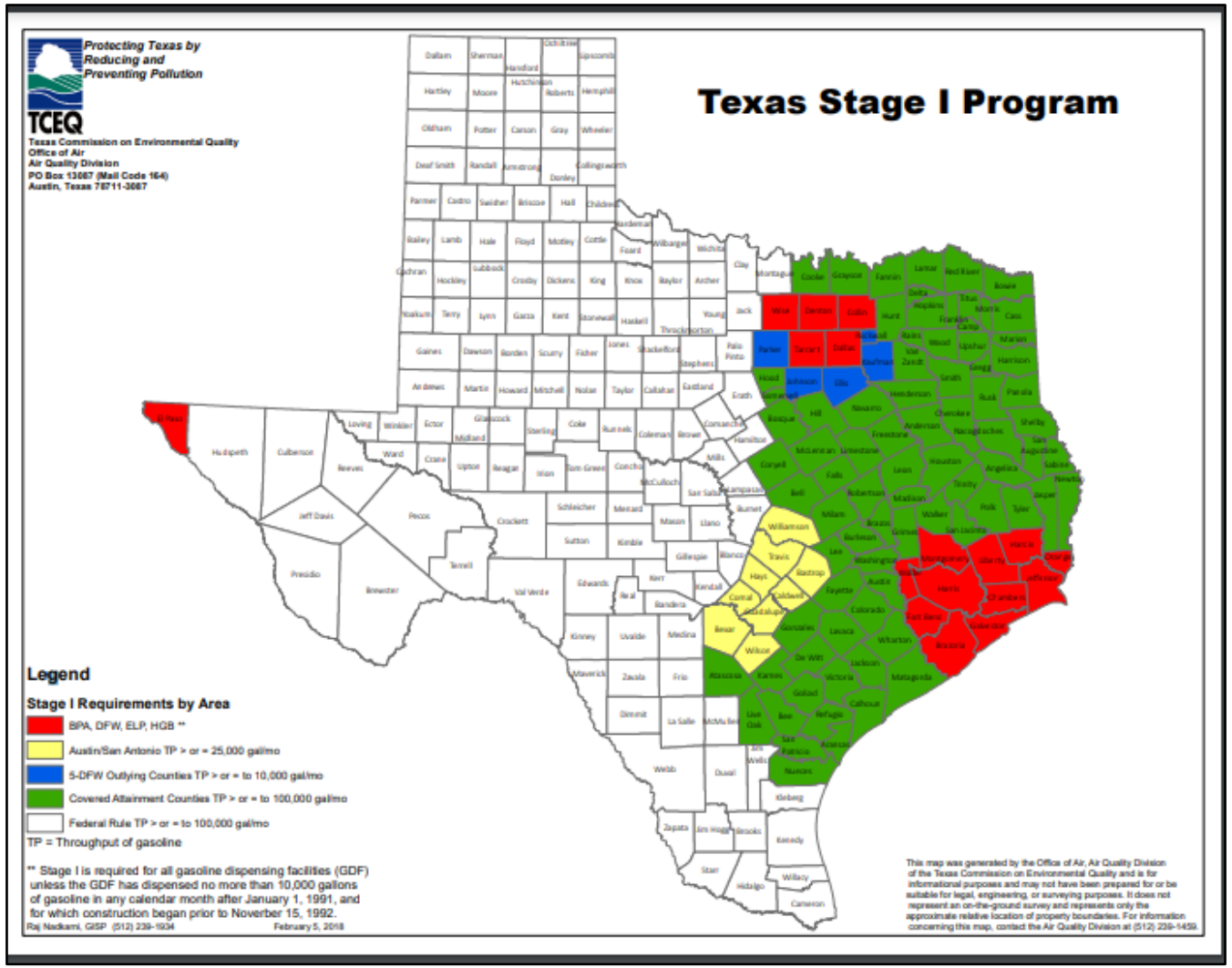
Applicability of the Stage I vapor recovery rules is determined by the county in which the gasoline dispensing facility is located and the gallons of gasoline that are dispensed from the facility in a month (monthly throughput).

Stage I Program area map

If your facility is located in an affected county and dispenses greater than the monthly throughput listed for that county, **your facility is subject to the Stage I rules**. If your facility is located in an affected county and dispenses less than the monthly throughput listed for that county, **your facility is exempt from the requirements** of the Stage I rule with a few exceptions. Monthly throughput exemptions can be found in **30 TAC 115.227**.

https://www.tceq.texas.gov/airquality/mobilesource/vapor_recovery.html#testing1

Stage I Applicability Map

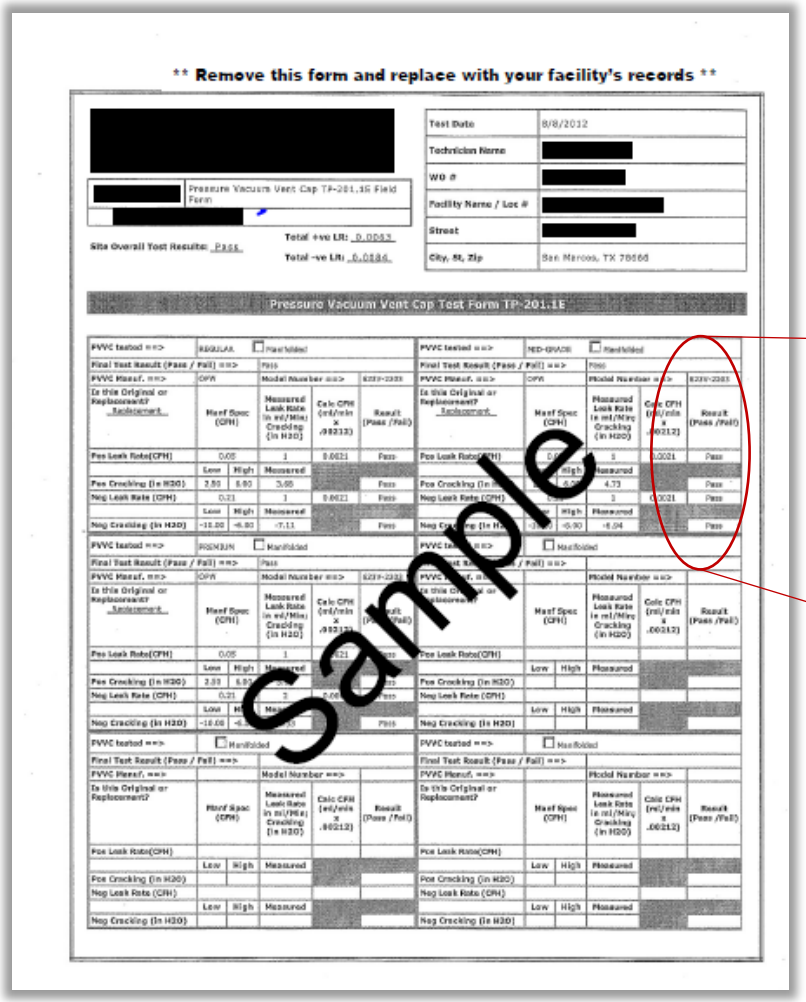


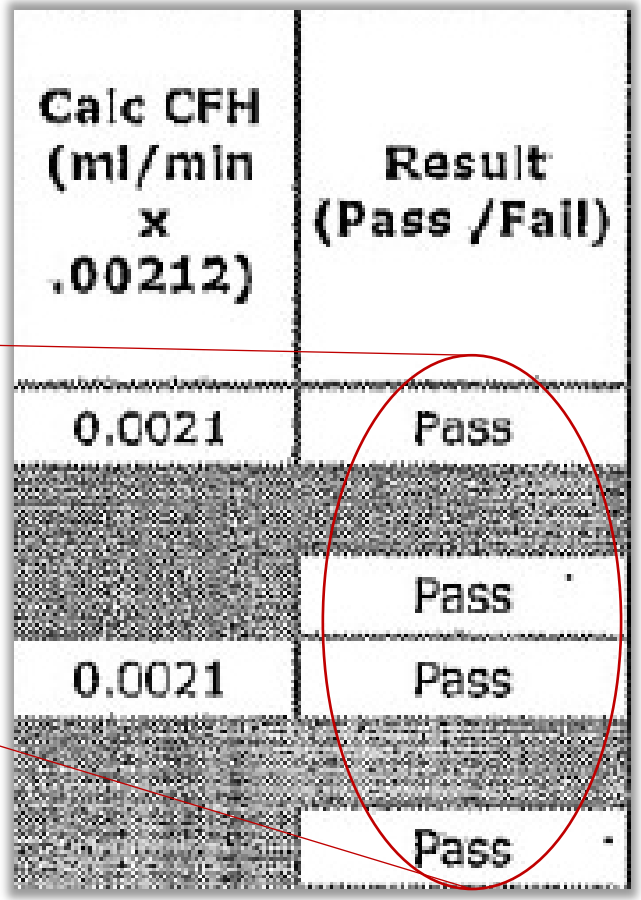
https://wayback.archive-it.org/414/20210527111654/https://www.tceq.texas.gov/assets/public/implementation/air/vr/TexasStageIProgramMap.pdf

Stage I and Stage II Records

- Stage I documentation:
  - Monthly gasoline throughput (inventory control records)
  - If applicable based on location and throughput:
    - Verification of a submerged fill tube
    - Annual test results for the past two years
    - 6C Certification documentation

Stage I Passing Test Results: Pressure Vacuum Vent Cap





Stage I Passing Test Results: Decay Test

Remove this form and replace with your facility's records

Form 102-1:

Pressure Decay Test Data

Test Date: 5/16/2014

Page 1 of 1

Facility Name: [redacted] Facility ID Number: [redacted]

Test Company Name: [redacted]

Type of Stage II System Installed: BALANCE Executive Order: [redacted]

Describe Manifolding of System (if any): NONE

Date and Time of Last Bulk Delivery / Removal: 4/7/2014 @ 07:30:00

Time of Last Vehicle Refueling Prior to Test: 11:00:00 Time Test Began: 12:00:00

	Parameter (Indicate Manifolding by Circling Tank Numbers →)	Tank Number 2				Total
1	Product Grade	REGULAR				[redacted]
2	Type of Storage Tank (AST or UST)	UST				
3	Actual Tank Capacity (gallons)	12016 12016				12016
4	Gasoline Volume (gallons)	7895				7895
5	Ullage (gallons) (Item 3 - Item 4)	4105				4121
6	Number of Nozzles w/ Vapor Return to Tank					0
7	P/V Manufacturers Rated Cracking Pressure					1.00
8	P/V Pressure When Cracking Began					2.50
9	Time Required to Pressurize System (seconds)					4
10	Nitrogen Flowrate Circle: SCFM or SCFH				Flowrate:	3.00
11	Initial Pressure (Inches WC)					2.00
12	Pressure After 1 Minute (Inches WC)					2.00
13	Pressure After 2 Minutes (Inches WC)					1.99
14	Pressure After 3 Minutes (Inches WC)					1.98
15	Pressure After 4 Minutes (Inches WC)					1.97
16	Pressure After 5 Minutes (Inches WC)					1.96
17	Allowable Final Pressure (from table or equation)*					1.93
18	Healy Nozzle to Multi / Mini-Jet: Pass or Fail	ΔV= Piping Length= ft. ΔΔV=				
19	Test Result: Pass or Fail					Pass

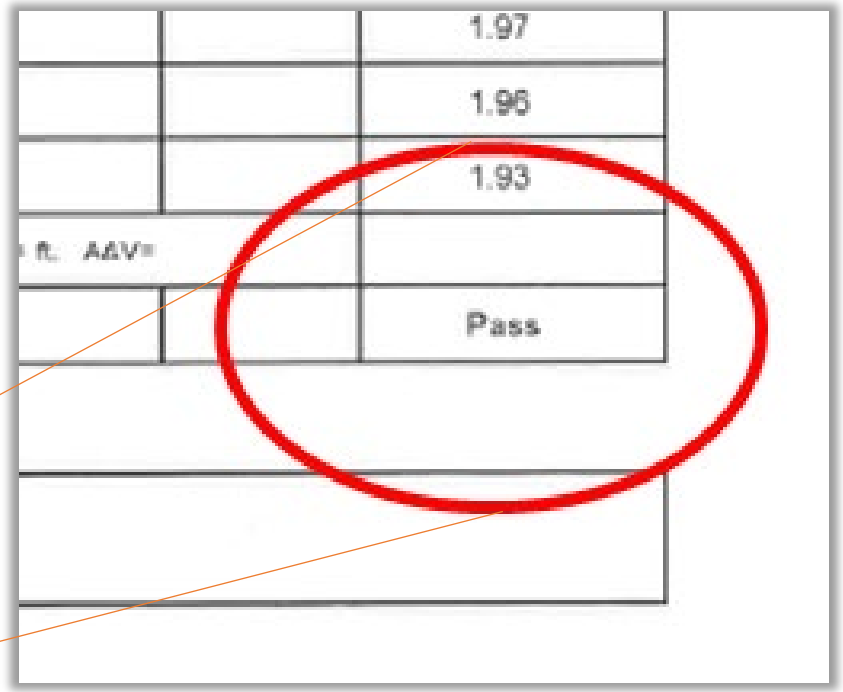
SAMPLE

Comments (Include any equipment replaced and / or repairs made prior to or during the test):

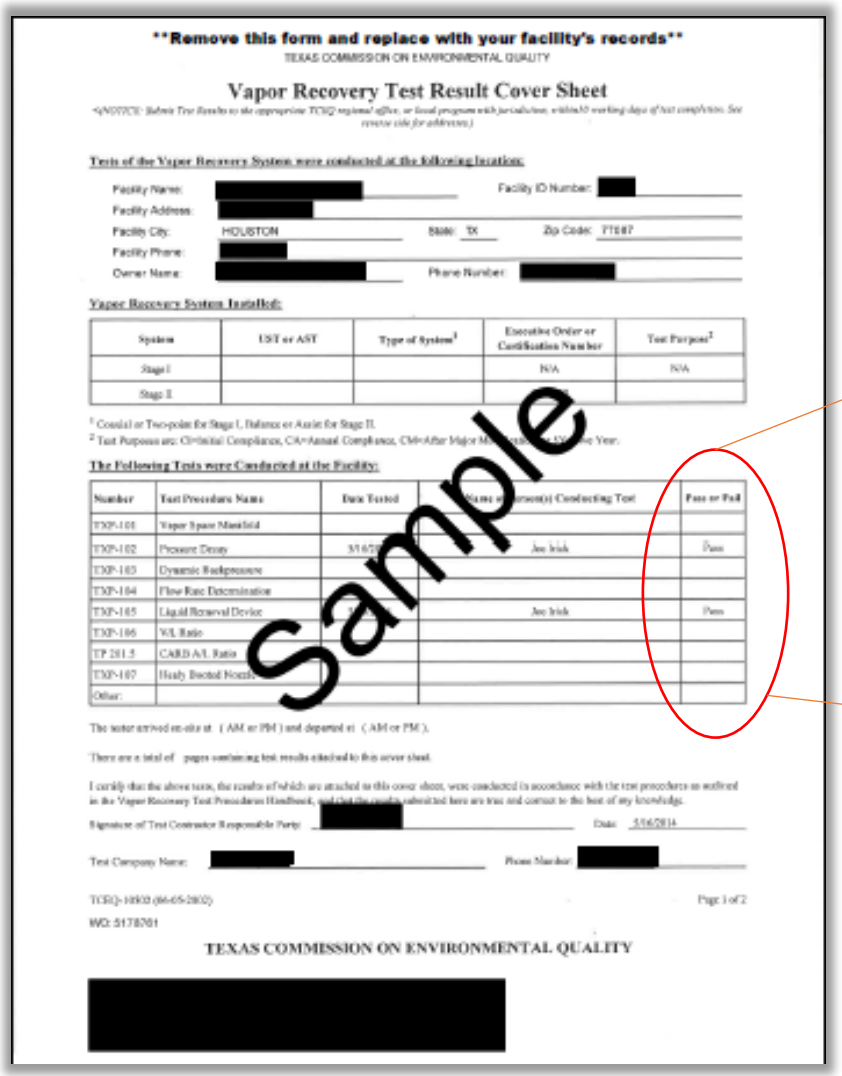
* Final regulatory compliance must be determined by using the appropriate equation in Section 9.2.

TCEQ-10504 (06-05-2002)

WO: 5176761 [redacted]



Stage I Passing Test Results



Remove this form and replace with your facility's records

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Vapor Recovery Test Result Cover Sheet

<NOTICE: Submit Test Results to the appropriate TCEQ regional office, or local program with jurisdiction, within10 working days of test completion. See reverse side for addresses.>

Tests of the Vapor Recovery System were conducted at the following location:

Facility Name: [redacted] Facility ID Number: [redacted]

Facility Address: [redacted]

Facility City: HOUSTON State: TX Zip Code: 77087

Facility Phone: [redacted]

Owner Name: [redacted] Phone Number: [redacted]

Vapor Recovery System Installed:

System	UST or AST	Type of System[1]	Executive Order or Certification Number	Test Purpose[2]
Stage I			N/A	N/A
Stage II				

[1] Coaxial or Two-point for Stage I, Balance or Assist for Stage II.

[2] Test Purposes are: CI=Initial Compliance, CA=Annual Compliance, CM=After Major M... ...ce Year.

The Following Tests were Conducted at the Facility:

Number	Test Procedure Name	Date Tested	Name(s) of Person(s) Conducting Test	Pass or Fail
TXP-101	Vapor Space Manifold			
TXP-102	Pressure Decay	5/16/2...	Joe Irish	Pass
TXP-103	Dynamic Backpressure			
TXP-104	Flow Rate Determination			
TXP-105	Liquid Removal Device		Joe Irish	Pass
TXP-106	V/L Ratio			
TP 201.5	CARB A/L Ratio			
TXP-107	Healy Booted Nozzle			
Other:				

Sample

The tester arrived on-site at (AM or PM) and departed at (AM or PM).

There are a total of pages containing test results attached to this cover sheet.

I certify that the above tests, the results of which are attached to this cover sheet, were conducted in accordance with the test procedures as outlined in the Vapor Recovery Test Procedures Handbook, and that the results submitted here are true and correct to the best of my knowledge.

Signature of Test Contractor Responsible Party: [redacted] Date: 5/16/2014

Test Company Name: [redacted] Phone Number: [redacted]

TCEQ-10800 (06-05-2002) Page 1 of 2

WO: 5178701

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

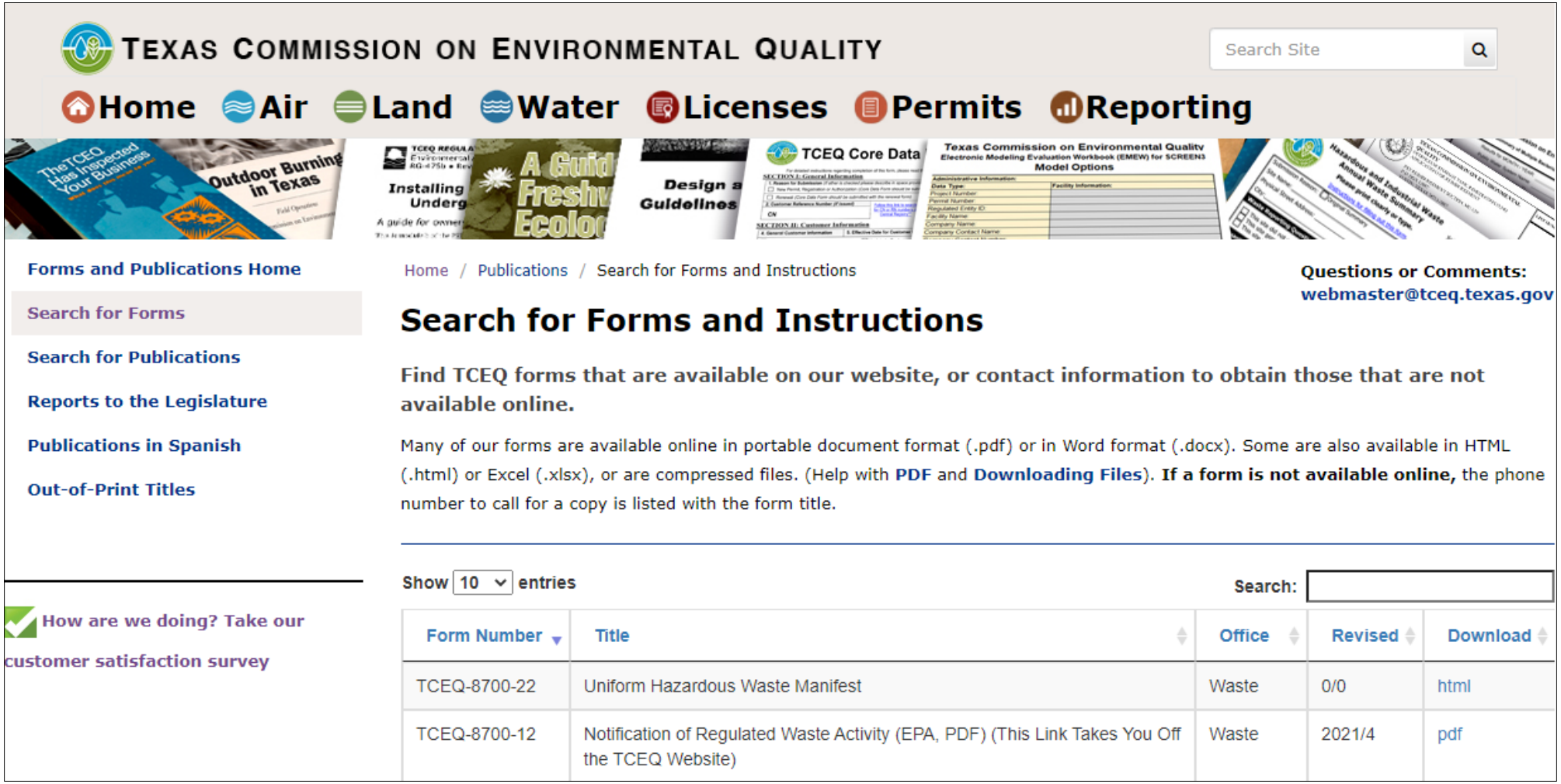
[redacted]

	Pass or Fail
	Pass
	Pass

What if I am missing information?

- Search TCEQ's Central Registry
  - Information about known PSTs and LPSTs
  - http://www15.tceq.texas.gov/crpub/
- Contact TCEQ regional office
- Request records from our Central File Room
  - File reviews
  - Request copies of records

TCEQ Forms Webpage



For More Information…

- Contact regional SBLGA staff
- www.texasenvirohelp.org
- Hotline: 1-800-447-2827
- Email: PSTHelp@tceq.texas.gov

Submit Questions to the Q&A