Texas Commission on Environmental Quality

CHECKLIST WORKSHEET

IHW NEW TANKS

Reg Ent Name : **Date :**

Add ID: **Investigator Name:**

Item No	Description	Answer	Citations	Notes
	SECTION A: Accumulation Time Exemption			
1	Is each tank clearly labeled or marked "Hazardous Waste"?		262.34(a)(3) 335.69(a)(3)	
2	Did generator exceed the accumulation time limitations?		262.34(b) 335.69(a)(1)(B)	
3	For regulated entities which accumulate hazardous waste in tanks for the purpose of facilitating proper recovery, treatment or disposal, is the tank clearly marked as required, or is the applicable information recorded and maintained in an operating record? (ref. 40 CFR 268.50(a)(2)(ii))		335.431(c) 268.50(a)(2)(ii)	
4	Have ignitable or reactive wastes been placed in tank systems? (If Yes, complete Section D)			
5	Are incompatible wastes placed in the same tank system? (If Yes, complete Section E)			
6	Does the regulated entity have Exempt 90-day tanks which have been closed? (If Yes, complete Section G)			
	SECTION B: New Systems			
1	Has a proper tank assessment been conducted? (ref 40 CFR 265.192(a))		335.112(a)(9) 335.69(a)(1)(B) 262.34(a)(1)(ii) 265.192(a) 335.152(a)(8) 264.192(a)	
2	Were any components of the tank placed underground?			
3	If YES:			
A	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?		264.19(c) 262.34(a)(1)(ii) 335.112(a)(9) 335.69(a)(1)(B) 265.192(c) 335.152(a)(8)	
B	Does the assessment contain an analysis to determine that the underground tank system components will be protected from vehicular traffic?		262.34(a)(1)(i) 335.112(a)(9) 265.192(a)(4) 335.69(a)(1)(B) 335.152(a)(8) 264.192(a)(4)	
4	Prior to covering, enclosing, or placing a new tank system or component into use, did an independent, qualified inspector or registered Professional Engineer (P.E.) inspect the system for the presence of weld breaks, punctures, scrapes of protective coatings, cracks, corrosion, or other structural damage or inadequate construction or installation?		335.152(a)(8) 264.192(b) 335.112(a)(9) 265.192(b) 335.69(a)(1)(B) 262.34(a)(1)(i)	
5	Was the tank and ancillary equipment tested for tightness prior to being covered, enclosed or placed in use?		335.152(a)(8) 335.112(a)(9) 262.34(a)(1)(i)	

CHECKLIST WORKSHEET

IHW NEW TANKS (Cont)

		.	335.69(a)(1)(B)	
		.	265.192(d)	
			264.192(d)	
6	Was the new tank provided with secondary containment prior to being put into service?	.	264.193(a)(1)	
		.	262.34(a)(1)(i)	
		.	335.69(a)(1)(B)	
		.	335.112(a)(9)	
		.	335.152(a)(8)	
		.	265.193(a)(1)	
7	Are installation statements maintained from those persons who supervised the tank system installation?	.	335.69(a)(1)(B)	
		.	262.34(a)(1)(i)	
		.	335.112(a)(9)	
		.	335.152(a)(8)	
		.	265.192(g)	
	SECTION C: Existing Systems (See Existing Systems Checklist)			
	SECTION D: Ignitable and Reactive Wastes			
1	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?	.	265.198(a)(1)(i)	
		.	264.198(a)(1)(i)	
		.	335.69(a)(1)(B)	
		.	262.34(a)(1)(i)	
		.	335.112(a)(9)	
		.	335.152(a)(8)	
	AND			
2	Did the regulated entity take precautions to prevent accidental ignition or reaction of waste?	.	335.112(a)(9)	
		.	335.152(a)(8)	
		.	265.198(a)(1)(ii)	
		.	264.198(a)(1)(ii)	
		.	262.34(a)(1)(i)	
		.	335.69(a)(1)(B)	
	OR			
3	Was the waste stored or treated such that it is protected from any material or condition that might cause it to ingite or react?	.	335.112(a)(9)	
		.	262.34(a)(1)(ii)	
		.	335.152(a)(8)	
		.	335.69(a)(1)(B)	
		.	265.198(a)(2)	
		.	264.198(a)(2)	
	OR			
4	Is the tank used solely for emergencies?	.	264.198(a)(3)	
		.	335.112(a)(9)	
		.	262.34(a)(1)(ii)	
		.	265.198(a)(3)	
		.	335.152(a)(8)	
		.	335.69(a)(1)(B)	
5	Does the tank meet the distance requirements from public ways (streets, alleys, adjoinoing property line) according to the chart in Table 2-1 through 2-6 of the National Fire Protection Association (NFPA)?	.	264.198(b)	
		.	265.198(b)	
		.	335.112(a)(9)	
		.	335.152(a)(8)	
		.	335.69(a)(1)(B)	
		.	262.34(a)(1)(ii)	
	SECTION E: Incompatible Wastes			
1	Did the regulated entity take precautions to prevent accidental ignition or reaction of wastes?	.	265.199(a)	
		.	264.199(a)	
		.	335.69(a)(1)(B)	
		.	335.112(a)(9)	
		.	335.152(a)(8)	
		.	262.34(a)(1)(ii)	

CHECKLIST WORKSHEET

IHW NEW TANKS (Cont)

2	If NO for question #1, was the tank decontaminated prior to placing an incompatible waste in it?		335.69(a)(1)(B) 264.199(b) 262.34(a)(1)(ii) 335.152(a)(8) 335.112(a)(9) 265.199(b)	
	SECTION F: Inspections			
1	Where present, does the owner/operator inspect the following each operating day:			
A	Overfill/spill control equipment and freeboard?		264.195(a) 335.69(a)(1)(B) 265.195(b)(1) 262.34(a)(1)(ii) 335.152(a)(8) 335.112(a)(9)	
B	Aboveground portions of tank system to detect corrosion or release of waste?		335.152(a)(8) 335.112(a)(9) 262.34(a)(1)(ii) 335.69(a)(1)(B) 265.195(b)(2) 264.195(c)(1)	
C	Data gathered from monitoring and leak detection equipment to ensure that the tank is being operated according to design?		335.112(a)(9) 335.69(a)(1)(B) 264.195(b) 265.195(a) 262.34(a)(1)(ii) 335.152(a)(8)	
D	Construction materials and the area immediately surrounding the external accessible portions of tank system, including secondary containment, to detect signs of releases of waste?		335.112(a)(9) 265.195(a)(4) 335.69(a)(1)(B) 265.195(b)(3) 264.195(c)(2) 262.34(a)(1)(ii) 335.152(a)(8)	
2	If present, have cathodic protection systems been inspected and confirmed to be working properly within 6 months after initial installation an annually thereafter?		264.195(g)(1) 265.195(f)(1) 335.152(a)(8) 335.69(a)(1)(B) 262.34(a)(1)(ii) 335.112(a)(9)	
3	If present, are all sources of impressed current inspected and tested at least bimonthly?		264.195(g)(2) 335.152(a)(9) 335.69(a)(1)(B) 265.195(f)(2) 335.152(a)(8) 262.34(a)(1)(ii)	
4	Is the inspection information documented in the operating record?		262.34(a)(1)(ii) 335.152(a)(8) 335.69(a)(1)(B) 335.112(a)(9) 265.195(g) 264.195(h)	
	SECTION G: Closure			
1	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?		264.197(a) 265.197(a) 335.69(a)(1)(B) 335.112(a)(9)	

CHECKLIST WORKSHEET

IHW NEW TANKS (Cont)

		.	262.34(a)(1)(ii) 335.152(a)(8)	
2	Did the regulated entity demonstrate that all contaminated soils could be removed or decontaminated?	. . . . .	335.112(a)(9) 335.152(a)(8) 335.69(a)(1)(B) 262.34(a)(1)(ii) 265.197(b) 264.197(b)	
3	If NO, did the regulated entity close the tank system and perform post-closure care as a landfill?	. . . . .	335.69(a)(1)(B) 264.197(c) 335.112(a)(9) 265.197(c) 262.34(a)(1)(ii) 335.152(a)(8)	
	SECTION H: Containment of Releases			
	Complete this section ONLY for LQGs which have tank system for which secondary containment is already a requirement.			
1	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?	. . . . .	264.193(d) 265.193(d) 262.34(a)(1)(ii) 335.69(a)(1)(B) 335.152(a)(8) 335.112(a)(9)	
2	Does secondary containment system meet the following requirements:			
A	For a liner external to the tank, is it:			
I	Designed or operated to contain 100% of the capacity of the largest tank within its boundar?	. . . . .	262.34(a)(1)(ii) 265.193(e)(1)(i) 335.69(a)(1)(B) 335.112(a)(9) 335.152(a)(8) 264.193(e)(1)(i)	
II	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?	. . . . .	262.34(a)(1)(ii) 265.193(e)(1)(i) 335.69(a)(1)(B) 335.112(a)(9) 335.152(a)(8) 264.193(e)(1)(i)	
III	Free of cracks or gaps?	. . . . .	262.34(a)(1)(ii) 265.193(e)(1)(iii) 335.69(a)(1)(B) 335.112(a)(9) 335.152(a)(8) 264.193(e)(1)(iii)	
IV	Designed and installed to completely surround the tank and to cover all surrounding earth likely to come into contact with the waste, if released?	. . . . .	265.193(e)(1)(iv) 262.34(a)(1)(ii) 335.69(a)(1)(B) 335.112(a)(9) 335.152(a)(8) 264.193(e)(1)(iv)	
	OR			
B	For a vault, is it:			
I	Designed or operated to contain 100% of the capacity of the largest tank within its boundary?	. . .	265.193(e)(2)(i) 262.34(a)(1)(ii) 335.69(a)(1)(B) 335.112(a)(9)	

CHECKLIST WORKSHEET

IHW NEW TANKS (Cont)

		.	335.152(a)(8) 264.193(e)(2)(i)	
II	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?	. . . . .	265.193(e)(2)(ii) 262.34(a)(1)(ii) 335.69(a)(1)(B) 335.112(a)(9) 335.152(a)(8) 264.193(e)(2)(ii)	
III	Constructed with chemical-resistant water stops in place at all joints, if any?	. . . . .	265.193(e)(2)(iii) 262.34(a)(1)(ii) 335.69(a)(1)(B) 335.112(a)(9) 335.152(a)(8) 264.193(e)(2)(iii)	
IV	Provided with an impermeable interior coating or lining that is compatible with the stored waste?	. . . . .	265.193(e)(2)(iv) 262.34(a)(1)(ii) 335.69(a)(1)(B) 335.112(a)(9) 335.152(a)(8) 264.193(e)(2)(iv)	
V	Provided with a means to protect against the formation and/or ignition of vapors within the vault?	. . . . .	265.193(e)(2)(v) 262.34(a)(1)(ii) 335.69(a)(1)(B) 335.112(a)(9) 335.152(a)(8) 264.193(e)(2)(v)	
VI	Provided with an exterior moisture barrier or other design to prevent migration of moisture?	. . . . .	265.193(e)(2)(vi) 262.34(a)(1)(ii) 335.69(a)(1)(B) 335.112(a)(9) 335.152(a)(8) 264.193(e)(2)(vi)	
	OR			
C	For a double-walled tank, is it:			
I	Designed as an integral structure so that any release from the inner tank is contained by the outer shell?	. . . . .	262.34(a)(1)(ii) 264.193(e)(3)(i) 335.69(a)(1)(B) 335.112(a)(9) 335.152(a)(8) 265.193(e)(3)(i)	
II	If constructed with metal, is it protected from both corrosion of the primary tank interior and the external surface of the outer shell?	. . . . .	262.34(a)(1)(ii) 264.193(e)(3)(ii) 335.69(a)(1)(B) 335.112(a)(9) 335.152(a)(8) 265.193(e)(3)(ii)	
111	Provided with a built-in leak detection system capable of detecting a release within 24 hours or earliest practical time?	. . . . .	262.34(a)(1)(ii) 264.193(e)(3)(iii) 335.112(a)(9) 335.152(a)(8) 335.69(a)(1)(B) 265.193(e)(3)(iii)	
3	Is ancillary equipment (note certain exclusions) provided with full secondary containment?	. . . .	262.34(a)(1)(ii) 264.193(f) 335.112(a)(9) 335.152(a)(8) 335.69(a)(1)(B)	

CHECKLIST WORKSHEET

IHW NEW TANKS (Cont)

			265.193(f)	
4	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?		262.34(a)(1)(ii) 265.193(c)(1) 335.112(a)(9) 335.152(a)(8) 335.69(a)(1)(B) 264.193(c)(1)	
5	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))		262.34(a)(1)(ii) 335.69(a)(1)(B) 264.193(c)(2) 265.193(c)(2)	
6	Does the secondary containment system have a leak detection system?		262.34(a)(1)(ii) 265.193(c)(2) 335.112(a)(9) 335.152(a)(8) 335.69(a)(1)(B) 264.193(c)(2)	
7	Is the secondary containment system sloped and designed to drain and remove liquids resulting from leaks, spills or precipitation?		262.34(a)(1)(ii) 265.193(c)(4) 264.193(c)(4) 335.152(a)(8) 335.69(a)(1)(B) 335.112(a)(9)	
8	For any tank system or secondary containment system that has had a leak, spill or been determined to be unfit for use:			
A	Was the unit immediately removed from service?		335.152(a)(8) 262.34(a)(1)(ii) 335.112(a)(9) 265.196 264.196 335.69(a)(1)(B)	
B	Was the flow restricted from entering the affected tank system or secondary containment system?		265.196(a) 335.152(a)(8) 335.69(a)(1)(B) 262.34(a)(1)(ii) 264.196(a) 335.112(a)(9)	
C	Was waste removed from the affected tank system or secondary containment system within 24 hours?		335.152(a)(8) 264.196(b) 262.34(a)(1)(ii) 265.196(b) 335.112(a)(9) 335.69(a)(1)(B)	
D	Was a release to the environment reported to the TCEQ within 24 hours?		262.34(a)(1)(ii) 335.69(a)(1)(B) 264.196(d) 265.196(d) 335.112(a)(9) 335.152(a)(8)	
E	If implementation of the Contingency Plan was required to remedy the leak or spill, was a report placed in the operating record?		335.152(a)(8) 335.69(a)(1)(B) 335.112(a)(9) 262.34(a)(1)(ii) 265.56(i) 264.56(j)	
F	If extensive repairs were made to the tank system prior to returning the system to service:			

CHECKLIST WORKSHEET

IHW NEW TANKS (Cont)

I	Was certification by an independent P.E. obtained prior to the unit's return to service?	. . . . .	262.34(a)(1)(ii) 264.196(f) 335.69(a)(1)(B) 335.152(a)(8) 265.196(f) 335.112(a)(9)	
II	Was the certification submitted to the TCEQ within 7 days after returning the tank system to use?	. . . . .	335.112(a)(9) 335.69(a)(1)(B) 335.152(a)(8) 265.196(f) 262.34(a)(1)(ii)	
G	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?	. . . . .	265.196(e)(4) 335.69(a)(1)(B) 335.152(a)(8) 262.34(a)(1)(ii) 264.196(e)(4) 335.112(a)(9)	