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Texas Commission on Environmental Quality

CHECKLIST WORKSHEET

IHW UIC COMPLIANCE

Reg Ent Name:

Date:

Add ID:

Investigator Name:

Item No	Description	Answer	Citations	Notes
	Section A -- PRE-INJECTION FACILITIES			
1	Are facilities injecting solid wastes including hazardous and/or nonhazardous wastes?			
2	Are the facilities injecting only waste as described in the UIC permit?			
3	Are pre-injection facilities (tank units and surface impoundments) covered under the applicable UIC or RCRA Permit?			
4	If no, are pre-injection facilities (tank units and surface impoundments) covered under the solid waste registration and exempted from RCRA permitting requirements?		335.6(c)	
5	Describe pre-injection facilities:			
6	Is any evidence present of fires and explosions or other releases to the environment from solid waste units or other on-site sources?		335.4(1) 335.4(3) 26.121 335.4	
	Note: If yes, refer to Generator Checklist for reviewing followup actions.			
	Section B-- UIC FACILITIES			
1	Is a legible sign with company name, company well number and Commission permit number posted at the well site?		331.66(b)(1)	
2	Is an all weather road to the well installed and maintained?		331.66(b)(2)	
3	Is wellhead painted (if appropriate), and maintained in good working order without leaks?		331.66(b)(3)	
4	Make the following observations during the investigation for onsite gauges and recorders, then provide comments for noncompliance: (List gauge reading, recorder reading, and permit limit, or the last analytical data, in the comments section of each question)			
A	Are gauges and recorders compliant with current permit limits for surface injection pressure? (psig)			
B	Are gauges and recorders compliant with current permit limits for annulus pressure? (psig)			
C	Is the calculated differential pressure compliant with current permit limits? (psi)			
D	Is the flow rate of the injectate stream compliant with current permit limits? (gpm)			
E	Is the fluid temperature of the injectate compliant with current permit limits?			
F	Is the pH of the injectate compliant with current permit limits? (Standard Units)			
G	Is the fluid density of the injectate compliant with current permit limits? (grams/cubic cm)			
	Operating, monitoring and testing requirements			
5	Are injection fluids sampled and analyzed sufficiently to yield representative data about characteristics?		331.64(b)(2) 331.64(b) 331.64(b)(4) 331.64(b)(1)(C)	

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			331.64(b)(1) 146.68(a) 331.64(b)(1)(B) 331.64(b)(3) 331.64(b)(1)(A)	
6	Are continuous recording devices used to monitor and record injection tubing pressures, injection flow rates, injection volumes, tubing-long string casing annulus pressure and volume, and any other data (differential pressure, pH, specific gravity, or other) specified by the permit?		331.64(d) 146.67(f)	
7	Is annulus pressure maintained at least 100 psi greater than the injection tubing pressure to prevent leaks from the well into unauthorized zones and to detect well malfunctions?		331.63(e) 146.67(c)	
8	Are annulus fluid volume changes regularly observed by the facility operator and records maintained?		331.64(d) 146.67(f)	
9	Are pressure gauges installed and maintained in proper working order at all times?		331.64(c)	
10	Are recorders installed and maintained in proper working order?		331.64(d)	
11	Are recorders and other required instruments housed in weatherproof enclosures?		331.64(d)	
12	Are automatic alarms and shutoff devices installed and operational?		331.64(d)(1) 146.67(f)(1)	
13	If no, has owner/operator certified that a trained operator will be on location and able to respond to alarms when an operating parameter is exceeded?		146.67(f)(2) 331.64(d)(2)	
14	Has an automatic alarm or shutoff system triggered since the last state investigation?			
A	If question 14 is YES, investigate the corrective actions taken by the facility and comment:			
15	Are corrosion monitoring tests, if required by permit, performed and recorded?		146.68(c)(2) 146.68(c)(3)(ii) 331.64(g)(1) 146.68(c)(3) 146.68(c)(2)(iii) 146.68(c)(2)(ii) 146.68(c)(2)(i) 146.68(c)(3)(i) 146.68(c) 331.64(g)(1)(C) 331.64(g)(1)(B) 331.64(g)(1)(A)	
16	Are all gauges, pressure sensing and recording devices tested and calibrated quarterly?		331.63(g)	
	Section C -- RECORDS REVIEW			
1	Are monthly and quarterly injection data submitted using the Commission self-reporting form as required by permit and rules? 331.65(c)(1) - Noncommercial facilities. or 331.65(c)(2) / 146.69(a) (b) - Commercial facilities		146.69(b) 146.69(a) 331.65(c)(1) 331.65(c)(2)	
2	Are complete and accurate records maintained as required by permit and rules?		331.67(a)	
3	Are records available for review by Commission representatives?		331.67(b)	
4	Are all records retained throughout the active life of the well and three years following the abandonment?		331.67(c)	
5	Has an injection zone annual report been submitted with December self reported data?		331.65(c)(3)(D) 331.65(c)(3)(E)	

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			331.65(c)(3)(B) 331.65(c)(3)(F) 331.65(c)(3)(C) 331.65(c)(3) 331.65(c)(3)(A)	
A	Did the facility receive an approval letter from the Commission?			
6	Did permittee notify Commission and get approval before beginning any well work-overs that require taking well out of service?		331.63(i)	
7	Has annual mechanical integrity been demonstrated by annulus pressure test and radio active tracer survey?		331.64(e)(1) 146.68(d)(1)	
8	Has an annual pressure falloff test been performed?		146.68(e)(1) 331.64(h)(2)	
A	Did the facility receive an approval letter from the Commission? If yes, please include date of the letter.			
9	Does permittee currently have sufficient financial assurance to meet permit requirements?		331.142 331.142(c) 331.142(a) 331.142(b)	
10	Note: Check the amount of financial security required by permit and note the assurance amount as adjusted for the current year:			
	Section D -- ABANDONED WELLS			
1	Is a permanent marker with permit number, date abandoned, and company name placed at the abandoned well? [331.46(l)]		331.46(l)	
2	Are all required monitoring parameters concerning post closure care for abandoned wells performed and reported? [331.46, 331.68 / 146.72 (b) (c)]		331.46 331.68 146.72	
	Section E -- SELF REPORTED DATA-RECORDS REVIEW			
	Review of Self Reported Data for (month, year). (List month and year, reported value, observed value, and permit limit, in the comments section of each question)			
1	Maximum Surface Injection Pressure (psig)		331.63(c) 331.67(a)(1)(A) 331.64(c) 331.64(d) 146.69(a)(2) 331.65(c)	
2	Minimum Annulus Pressure (psig)		331.64(d) 331.63(e) 331.65(c) 331.67(a)(1)(B) 146.69(a)(2) 331.64(c)	
3	Minimum Differential Pressure (psig)		331.63(e) 331.65(c)	
4	Maximum Injection Rate (gpm)		331.64(d) 331.63(f) 331.67(a)(1)(C) 331.65(c)	
5	Monthly Average Injection Rate (gpm)		331.63(f) 331.65(c)	
6	Total Injection Volume (mgals/month)		146.69(a)(4)	

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		-	331.65(c) 331.67(a)(1)(D)	
7	Minimum pH (standard units)	- - - -	331.65(c) 331.66(c)(1) 331.63(h) 146.69(a) 146.69(b)	
8	Maximum Fluid Density (g/cc)	- -	146.69(a)(6) 331.65(c) 331.63(h)	
9	Injection Fluid Temperature (degree F)	- - -	331.66(c)(1) 331.64(d) 146.69(a) 331.65(c)	
10	Other Permit Parameters		331.63(h)	
	Pen Colors and Conversion Factors (optional)			
1	List pen colors for strip charts / recorder wheels.			
2	List conversion factors for strip charts / recorder wheels.			