



## Small Business & Local Government Assistance Underground Petroleum Storage Tank (PST) Compliance Checklist

This checklist is for guidance purposes only. It is not a substitute for the rules and regulations. The Small Business & Local Government Assistance (SBLGA) Program is an independent section, separate from enforcement of the Texas Commission on Environmental Quality (TCEQ). Contact SBLGA on its toll-free hotline 800-447-2827 or on the SBLGA Web site <[www.texasenvirohelp.org](http://www.texasenvirohelp.org)>.

**Company Information** \_\_\_\_ 1<sup>st</sup> visit Site Visit Date: \_\_\_\_\_

Company Name		Facility Contact	
Mailing Address		Physical Address	
		County	
Owner's Name		Business Phone	
Date of Construction		Primary SIC	
Start of Operation		Secondary SIC	
Latitude		Longitude	

**IMPORTANT NOTES:**

- Compliance-related questions are denoted with an asterisk (\*). Answering “no” to a question with an asterisk may mean the facility is out of compliance with state or federal environmental rules.

Spill and Overfill Protection		Yes	No	N/A
1 *	Is the fill pipe to the underground storage tank (UST) equipped with a device that provides a liquid-tight seal during the transfer of liquid product (such as gasoline) into the tanks?			
2 *	Is the fill pipe equipped with spill-containment equipment sufficient to prevent the release of liquid product into the environment?			
3 *	Does the UST system have an overfill protection device, such as an audible alarm or ball float, that automatically shuts off the flow of liquid product from the tanker truck when the USTs are approximately 90% full?			
4 *	At least once every 60 days, have all spill containers been inspected to ensure their sides, bottoms, and any penetration points are liquid-tight?			
5 *	Have all liquids or debris found during the inspection been removed and properly disposed of within 72 hours of discovery?			

<b>Corrosion Protection</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
6 *	Does the UST system have corrosion protection? Corrosion protection is not required for tank systems that are completely non-corrodible, such as fiberglass tanks. All underground metal components should be protected.			
7 *	If the tank system requires corrosion protection, has the corrosion protection system been inspected by a qualified corrosion specialist or corrosion technician within 6 months after it was installed and at least once every three years thereafter?			
8*	Are metallic components in sumps and manways protected against immersion in water by a corrosion protection system?			
9 *	At least once every 60 days, has the facility ensured that the rectifier and other system components are working properly? (For impressed current systems only)			
<b>Financial Assurance</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
10 *	Can the owner/operator demonstrate financial assurance for taking corrective action and for compensating third parties for bodily injury and property damage caused by accidental releases arising from the operation of the PSTs? (TAC Chapter 37.815)			
<b>Release Detection for Piping</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
11 *	Has all piping been monitored for releases as required? (Chapter 334.50)			
12 *	Has all pressurized piping been equipped with an automatic or electronic line leak detector?			
13*	Has an annual function test been performed on each mechanical automatic line leak detector?			
<b>Release Detection for Underground Storage Tanks</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
14*	Does the facility monitor the UST for releases at least once per month?			
15*	Does the facility conduct inventory control for all USTs involved in the retail sale of fuel? (Not required for fleet fueling facilities unless inventory control is part of the release detection method)			
16*	Does the facility use Automatic Tank Gauging (ATG) and Inventory Control as a release detection method? (Please note that ATG must be used in combination with Inventory Control if this is the release detection method used at the facility.)			

17*	If yes, is the ATG put into test mode at least once per month and is there documentation of at least one passing result?			
18*	Does the facility conduct and record inventory volume measurements for inputs, withdrawals, and amount of liquid product remaining in the tank each operating day (if required)?			
19*	Does the facility reconcile the inventory volume measurements at least once per month (if required)?			
20*	Is the reconciliation sufficient to detect a release as small as the sum of 1% of the total substance throughput for the month plus 130 gallons (if required)?			
21*	Does the facility use groundwater monitoring or vapor monitoring as a release detection method?			
22*	If yes,			
	a.* Does the facility monitor and record readings at least once per month?			
	b.* Does the facility have documentation of this? (Records should be kept for at least 5 years)			
23*	Has qualified personnel conducted a site assessment at the facility to ensure that groundwater monitoring or vapor monitoring is an adequate form of release detection? (Documentation of the site assessment should be maintained on site)			
24*	If the facility does not use Automatic Tank Gauging and Inventory Control, groundwater monitoring, or vapor monitoring as release detection methods, are at least one of the following methods used?			
	a.* Statistical Inventory Reconciliation (must be used in combination with inventory control).			
	b.* Interstitial Monitoring (used in jacketed or double-walled UST systems)			
	c.* Secondary Containment Monitoring			
	d.* Manual Tank Gauging (acceptable for tanks 1,000 gallons or smaller)			
25*	Does the facility have sumps and/or manways installed prior to January 1, 2009 and used for release detection?			
	a. If yes, does the facility inspect at least once every 60 days and keep records?			

26	Does the facility have sumps and/or manways installed after January 1, 2009 and used for release detection?			
	If yes:			
	a.* Is the sump or manway compatible with the stored substance(s)?			
	b.* Was the sump or manway tightness tested at installation and every three years thereafter?			
	c.* Is the sump or manway equipped with a liquid-sensing probe set to alert the owner or operator if more than 2 inches of liquid collects?			
	d.* Has all liquid or debris been disposed of properly within 72 hours of discovery?			
27	Does the facility have dispenser sumps installed after January 1, 2009?			
	If yes:			
	a.* Is the dispenser sump compatible with the stored substance(s)?			
	b.* Was the dispenser sump tightness tested at installation and every three years thereafter?			
	c.* Is the dispenser sump equipped with a liquid-sensing probe set to alert the owner or operator if more than 2 inches of liquid collects?			
	d.* Has all liquid or debris been disposed of properly within 72 hours of discovery?			
28*	Is a new dispenser, installed on or after January 1, 2009, equipped with a dispenser sump?			
29*	Is each new and replacement tank and new piping system installed after January 1, 2009 secondarily contained?			
30*	If the facility has had a reportable release or suspected release, has the release been reported to the TCEQ within 24 hours? (Chapter 334.72)			
<b>Registration</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
31*	Does the facility have a delivery certificate for all USTs containing motor fuel?			
32*	Is the delivery certificate up-to-date?			
33*	Is the delivery certificate posted where it can be seen at all times?			
34*	Has a TCEQ Registration and Self-certification form been submitted for all in-use USTs, including proof of financial assurance?			

35*	Has a TCEQ Registration and Self-certification form been submitted for all non-empty USTs not currently in-use, including proof of financial assurance?			
36*	Has a TCEQ Registration form been submitted for aboveground storage tanks (ASTs), if any? (Self-certification is not required for above-ground storage tanks and tanks that are exempt or excluded from the requirements of TAC Chapter 334)			
37*	Is the tank registration information correct and up-to-date?			
38*	Are the fill-pipes to the tanks properly labeled?			
<b>Recordkeeping</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
39*	Does the facility keep track of all records relating to the facility PST system's installation and upgrades? These records must be kept for the active life of the system.			
40*	Does the facility keep track of all leak detection records and other monitoring records? These records are to be kept for a minimum of five years.			
41	Are records readily available in case the facility is inspected?			
<b>Texas Department of Agriculture</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
42	Is the Texas Department of Agriculture Registration Form current and posted?			
43	Are the inspection approval seals current and posted?			
44	If the delivery tickets show that ethanol blended fuel is being delivered, is the dispenser clearly marked?			
<b>Air Regulations (Federal Requirements, 40 CFR 60, 61, 63)</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
45*	Is the facility subject to 40 CFR Part 63, Subpart CCCCCC—National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities?			
	<a href="http://epa.gov/ttn/atw/mactfnlalph.html">http://epa.gov/ttn/atw/mactfnlalph.html</a>			
46*	If yes:			
	a.* Does the facility have documentation of gasoline throughput to determine what requirement(s) are applicable?			
	b.* Has the owner or operator of the facility submitted an Initial Notification and Compliance Certification?			

c.* Has the owner or operator of the facility submitted a Notification of Compliance by the compliance date(s) specified in the rule?			
d.* Is the facility compliant with the applicable emission limitations and management practices based on throughput?			
e.* Has the facility conducted and documented compliance with the required testing and monitoring requirements for the previous 5 years?			

**Stage I and II Requirements for Gasoline Dispensing Facilities**

**NOTE: Applicable to non-attainment counties, covered attainment counties, and early action compact counties only.**

**Stage I Covered Attainment Counties**

If throughput is greater than 125,000 gallons of gasoline per month in any one month.

Anderson	Calhoun	Franklin	Houston	Matagorda	Red River	Trinity
Angelina	Camp	Freestone	Hunt	McLennan	Robertson	Tyler
Aransas	Cass	Goliad	Jackson	Milam	Rusk	Upshur
Atascosa	Cherokee	Gonzales	Jasper	Morris	Sabine	Van Zandt
Austin	Colorado	Grayson	Karnes	Nacogdoches	San Augustine	Victoria
Bee	Cooke	Gregg	Lamar	Navarro	San Jacinto	Walker
Bell	Coryell	Grimes	Lee	Newton	San Patricio	Washington
Bosque	De Witt	Harrison	Leon	Nueces	Shelby	Wharton
Bowie	Delta	Henderson	Limestone	Panola	Smith	Wise
Brazos	Lavaca	Hill	Live Oak	Polk	Somervell	Wood
Falls	Fannin	Hood	Madison	Rains	Titus	
Burleson	Fayette	Hopkins	Marion			

**Stage I Early Action Compact Counties – Austin and San Antonio Area**

If throughput is greater than 25,000 gallons of gasoline in any calendar month after December 31, 2004.

The deadline for installing Stage I equipment was no later than December 31, 2005.

Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, Wilson

**Stage I Counties – DFW Area**

If throughput is greater than 10,000 gallons of gasoline in any calendar month after April 30, 2005.

The deadline for installing Stage I equipment is as soon as practicable, but no later than June 15, 2007.

Ellis, Johnson, Kaufman, Parker, Rockwall

**Stage I and II Counties**

Brazoria, Chambers, Collin, Dallas, Denton, El Paso, Galveston, Fort Bend, Hardin, Harris, Jefferson, Liberty, Montgomery, Orange, Tarrant, Waller

Stage I		Yes	No	N/A
47*	If the facility is exempt from Stage I requirements, does the facility have documentation to support it?			

48*	a.* Does the facility have Stage I vapor recovery installed?			
	b.* Is the Stage I vapor recovery system kept in good working condition? (Chapter 115.240)			
49*	Have all required Stage I tests been performed?			
50*	Is the UST equipped with a submerged fill pipe?			
<b>Stage II</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
51*	a.* Does the facility have Stage II vapor recovery installed?			
	b.* Is the Stage II vapor recovery system kept in good working condition? (Chapter 115.240)			
52*	a.* Is the Stage II system inspected daily or monthly as required?			
	b.* Are inspection records kept?			
53*	a.* Does the facility have the correct California Air Resources Board (CARB) order for the Stage II system?			
	b.* Is the system operating in accordance with the CARB order? (contact the facility supplier for more information)			
54*	Is there a designated employee trained in the correct operation of the Stage II system?			
55*	Are the shut-off valves working properly?			
56*	Are the dispenser operating instructions clearly posted on all dispensers?			
57*	Is the vacuum unit operating properly?			
58*	Is the vapor processing unit working properly?			
59*	Is the face plate in good condition?			
60*	Are the vapor hoses clear of all blockages? (flattened hoses or hoses with kinks or tears should be replaced)			
61*	a.* Are the appropriate nozzles used?			
	b.* Are the nozzles in good condition?			
62*	If the facility is exempt from Stage II requirements...			
	a.* Has the facility filed annual exemption paperwork with the TCEQ?			
	b.* Does the facility have documentation to support the claim?			

## **Edwards Aquifer**

Tanks located on the Edwards Aquifer Recharge, Transition or Contributing Zone may have additional requirements. Please refer to the Small Business & Local Government Assistance Edwards Aquifer Checklist for further information.

### **Comments:**

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