



Small Business & Local Government Assistance 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](#).

Company Information		___ 1 st visit	___ 2 nd visit	___ C2 Renewal	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 a checkmark (✓). Answering “no” to a question with a checkmark may mean the facility is out of compliance with state or federal environmental rules.
- Have there been any process changes since the last site visit? Y* / N
*If yes, explain the changes and include the date of changes in the comments.

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?			
Corrosion Protection		Yes	No	N/A
4 ✓	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.)			
5 ✓	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?			

6 ✓	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)			
Financial Assurance		Yes	No	N/A
7 ✓	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)			
Release Detection for Piping		Yes	No	N/A
8 ✓	Has all piping been monitored for releases as required? (Chapter 334.50)			
9 ✓	Has all pressurized piping been equipped with an automatic or electronic line leak detector?			
10 ✓	Has an annual function test been performed on each line leak detector?			
Release Detection for Underground Storage Tanks		Yes	No	N/A
11 ✓	Does the facility monitor for releases at least once per month?			
12 ✓	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)			
13 ✓	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.)			
14 ✓	If yes, is the ATG put into test mode at least once per month and is there documentation of at least one passing result?			
15 ✓	If required, does the facility conduct and record inventory volume measurements for inputs, withdrawals, and amount of liquid product remaining in the tank each operating day?			
16 ✓	If required, does the facility reconcile the inventory volume measurements at least once per month?			
17 ✓	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?			
18 ✓	Does the facility use groundwater monitoring or vapor monitoring as a release detection method?			
19 ✓	If yes, a. Does the facility monitor and record readings at least once per month?	a.		
	b. Does the facility have documentation of this? (Records should be kept for at least 5 years)	b.		
20 ✓	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)			

21✓	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).	a.		
	b. Interstitial Monitoring (used in jacketed or double-walled UST systems)	b.		
	c. Secondary Containment Monitoring	c.		
	d. Manual Tank Gauging (acceptable for tanks 1,000 gallons or smaller)	d.		
22✓	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)			
Registration		Yes	No	N/A
23✓	Does the facility have a delivery certificate?			
24✓	Is the delivery certificate up-to-date?			
25✓	Is the delivery certificate posted where it can be seen at all times?			
26✓	Has a TCEQ Registration and Self-certification form been submitted for the USTs?			
27✓	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)			
28✓	Is the tank registration information correct and up-to-date?			
29✓	Have all facility fees been paid in full?			
30✓	Are the fill-pipes to the tanks properly labeled?			
Recordkeeping		Yes	No	N/A
31✓	Does the facility keep track of all records relating to their Petroleum Storage Tank system? Records relating to the facility PST system's installation and upgrades must be kept for the active life of the system. Leak detection records and other monitoring records are to be kept for a minimum of five years. It is very important that all records are readily available in case the facility is inspected.			
Texas Department of Agriculture		Yes	No	N/A
32	Is the Texas Department of Agriculture Registration Form current and posted?			
33	Are the inspection approval seals current and posted?			
Air Regulations (Federal Requirements, 40 CFR 60, 61, 63)		Yes	No	N/A
34✓	Is the facility subject to 40 CFR Part 63, Subpart CCCCCC— National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities? http://epa.gov/ttn/atw/mactfnlalph.html			

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

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

Stage I		Yes	No	N/A
40 ✓	If the facility is exempt from Stage I requirements, does the facility have documentation to support it?			
41 ✓	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)			
42 ✓	Have all required Stage I tests been performed?			
43 ✓	Is the UST equipped with a submerged fill pipe?			
Stage II		Yes	No	N/A
44 ✓	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)			
45 ✓	a. Is the Stage II system inspected daily or monthly as required?			
	b. Are inspection records kept?			
46 ✓	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)			
47 ✓	Is there a designated employee trained in the correct operation of the Stage II system?			
48 ✓	Are the shut-off valves working properly?			
49 ✓	Are the dispenser operating instructions clearly posted on all dispensers?			
50 ✓	Is the vacuum unit operating properly?			
51 ✓	Is the vapor processing unit working properly?			
52 ✓	Is the face plate in good condition?			
53 ✓	Are the vapor hoses clear of all blockages? (flattened hoses or hoses with kinks or tears should be replaced)			
54 ✓	a. Are the appropriate nozzles used?			
	b. Are the nozzles in good condition?			
55 ✓	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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