A BASIC CHECKLIST FOR USTs

The information and checklist that follow can help you evaluate your underground storage tank systems (USTs). You can use the checklist to see how closely you meet the Federal regulations for USTs (40 CFR Part 280). The checklist can also help you prepare for official inspections of USTs.

You can find the most current checklist and UST information at EPA's Web site dedicated to USTs at **http://www.epa.gov/OUST/**.

Please note that this checklist covers only Federal regulations for operating USTs properly. The checklist does not cover requirements for corrective action in response to UST leaks. **Be sure you check with your State and local agencies to see if they have additional or different requirements for your USTs.** States and industry organizations may provide you with their own checklists. You can use the Web site address above or call EPA's Hotline at 800-424-9346 to identify appropriate State contacts or to ask questions about the UST requirements.

Please note that using this checklist does not guarantee that you are in fact in compliance with UST requirements. Only an official site inspection can confirm your compliance status and reveal potential violations and penalty fees.

Filling Out The Checklist
The checklist provides columns for up to four USTs. Make as many additional copies of the checklist as you need to cover all your USTs as you periodically evaluate their compliance status.

Use The Checklist Periodically
Many of the following items need to be reevaluated periodically to ensure your USTs that may be in compliance at one point in time **STAY in compliance over time. Do not fill out the checklist once and then forget about it.** At a minimum, you should update your checklist response at least once a year or whenever your make changes to USTs, repair equipment, or respond to any operational problems. You need to make sure you follow all operation and maintenance procedures that can keep your USTs in compliance, protect your investment, and protect human health and the environment from costly leaks. **Avoid violations and penalty fees by constantly keeping USTs in compliance.**

Need More Information To Answer Questions?
You may find you need more information as you fill out the checklist. You may need to know more about release detection choices and their restrictions, for example. Each section of the checklist refers you to a corresponding section in EPA's ***Musts For USTs: A Summary Of Federal Regulations*** *(July 1995)*. You may also want to refer to other EPA publications on release detection requirements, such as ***Straight Talk On Tanks, Doing Inventory Control Right, Manual Tank Gauging***, and ***Introduction To Statistical Inventory Reconciliation***. All EPA publications on USTs are easily retrieved without cost from EPA's Web site on USTs, EPA's Hotline at 800-424-9346, or EPA's publications distributor at 800-490-9198. **Some basic information follows below.**

Release Detection
- *Long-term "Monthly Monitoring" methods:* These methods include interstitial monitoring, automatic tank gauging systems, groundwater monitoring, vapor monitoring, and other methods approved by an implementing agency to work equally well, such as statistical inventory reconciliation (SIR). Be sure you check pages 8-11 in ***Musts For USTs*** (or the other publications noted above on release detection) to make sure you understand the various restrictions and limitations of each method when used at your UST.
- *Temporary release detection methods*: For 10 years following installation of a new UST or the upgrading of an old UST, you can often use a combination of periodic tank tightness testing with either inventory control or manual tank gauging. Be sure you check pages 8-11 in ***Musts For USTs*** (or the other publications noted above on release detection) to make sure you understand the various restrictions and limitations of each method when used at your UST.
- *Don't forget about the additional requirements for your UST's piping.* Pressurized piping and suction piping have different requirements (page 11 in ***Musts For USTs***).

Corrosion Protection
All tanks and piping must be protected from corrosion, but USTs installed before December 22, 1988 can use some retrofit approaches not allowed for USTs installed on or after December 22, 1988. Be sure you know the corrosion protection requirements for each of your USTs.

Spill Protection
All USTs must be protected from spills by having devices such as "spill buckets" or catchment basins that can contain spilled product.

Overfill Protection
All USTs must be protected from overfills by using such devices as automatic shutoff devices, overfill alarms, or ball float valves.

Recordkeeping
As a rule of thumb, keep records of reports, tests, repairs, and other actions or know where these records are kept at an off-site location. In some cases, such as closure site assessments, records may be kept by implementing agencies.

Notification
You should have filed a notification form with your implementing agency for all USTs at your facility. Notification forms for USTs installed after December 22, 1988 must include a certification of correct installation.

Closing USTs
You can temporarily close an UST by meeting the requirements for temporary closure (page 25 in ***Musts For USTs***), which at a minimum can involve continuing operation of release detection and corrosion protection methods. Permanent closure of an UST requires several steps intended to ensure the safety of those closing or removing tanks and to determine if contamination from your UST is present in the surrounding environment (page 25 in ***Musts For USTs***).

Financial Responsibility
You must demonstrate your financial responsibility for the cost of cleaning up a leak and compensating other people for bodily injury and property damage. Financial responsibility levels depend in part on the number of USTs you have and if you are a marketer or nonmarketer. Please refer to EPA's ***Dollars And Sense*** for a full explanation. All EPA publications on USTs are easily retrieved without cost from EPA's Web site, EPA's Hotline at 800-424-9346, or EPA's publications distributor at 800-490-9198.

Implementing Agency
Some items above refer to "the implementing agency." The "implementing agency" is simply the agency that has jurisdiction over your USTs. The state environmental agency is usually the implementing agency. If your USTs are in Indian Country, contact your Regional U.S. EPA. Contact information for State and EPA Regional implementing agencies is available from EPA's Web site on USTs or EPA's Hotline at 800-424-9346.

Corrective Action
This checklist does not address requirements for reporting and responding to an UST leak. The steps you need to take in responding to an UST leak are usually dictated by site-specific conditions and the procedures established by the implementing agency. Be sure you check with your State or U.S. EPA Regional contact on steps to take. Contact information for State and EPA Regional implementing agencies is available from EPA's Web site on USTs or EPA's Hotline at 800-424-9346.

If you cannot answer any of the following questions or find that you are missing something, you must take action quickly to remedy the situation. If not, you may be cited for violations and subject to penalty fees during official UST inspections. All page references in the checklist are to EPA's *Musts For USTs: A Summary Of Federal Regulations (July 1995)*. **Note: This checklist covers most Federal regulations, but be sure to check with State/local agencies that may have additional/different requirements or their own checklists.**

Answer by entering: ✔ for Yes *or* NA for Not Applicable

Please note that filling out this checklist does not guarantee that you are in fact in compliance with UST requirements. Only an official site inspection can confirm your compliance status.

Facility name or ID#: **Date of today's evaluation:**

Your USTs have **RELEASE DETECTION**? (See pages 8-11 for allowable methods and their restrictions):	Need at least one check in each column			
	UST #1	**UST #2**	**UST #3**	**UST #4**
UST uses Interstitial Monitoring at least monthly?				
UST uses Automatic Tank Gauging at least monthly?				
UST uses Vapor Monitoring at least monthly?				
UST uses Groundwater Monitoring at least monthly?				
UST uses Manual Tank Gauging alone (only for tanks <1001 gallons)?				
UST uses Manual Tank Gauging & Tank Tightness Testing (only for tanks <2001 gallons and 10-year maximum use)?				
UST uses Inventory Control and Tank Tightness Testing (10-year maximum use)?				
Specify any other release detection method, such as SIR:				
If UST has **PRESSURIZED PIPING**:	Need at least one check in each column			
Piping has automatic flow restrictor (see page 11)?				
Piping has automatic shutoff device (see page 11)?				
Piping uses continuous alarm system (see page 11)?				
If UST has **PRESSURIZED PIPING**:	Need at least one check in each column			
Piping uses annual line tightness testing (see page 11) ?				
Piping uses monthly monitoring (see page 11)?				
If UST has **SUCTION PIPING**:	Need at least one check in each column			
Piping uses monthly monitoring (see page 11)?				
Piping uses line tightness testing every 3 years (see page 11)?				
Piping has no release detection requirements (see page 11)?				
You keep **RECORDS OF RELEASE DETECTION**? (See page 27):	Respond in all columns & rows			
You keep records at least 1 year showing the results of repairs and of monthly sampling, testing, and monitoring of release detection (except for tank tightness testing records, which you keep until the next test)?				
You keep records at least 5 years of calibration and maintenance of release detection equipment? Put **NA** in the box if you use manual tank gauging, inventory control, or tank tightness testing.				
You keep vendor's performance claims and results of third-party evaluations for 5 years for interstitial monitoring, automatic tank gauging, vapor monitoring, groundwater monitoring, tank tightness testing, or other applicable approved methods?				

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Your USTs have **CORROSION PROTECTION?** (See pages 16-17 and 20-21 on corrosion protection for TANKS):	Need at least one check in each column			
	UST #1	UST #2	UST #3	UST #4
Tank is fiberglass?				
Tank is coated & cathodically protected steel?				
Tank is steel clad (or jacketed) with noncorrodible material?				
Tank retrofitted with cathodic protection?				
Tank retrofitted with interior lining?				
Specify any other method used to achieve tank's corrosion protection:				
(See pages 16 and 21 on corrosion protection for PIPING):	**Need at least one check in each column**			
Piping is fiberglass?				
Piping is coated & cathodically protected steel?				
Piping retrofitted with cathodic protection?				
Specify any other method used to achieve piping's corrosion protection:				
You have RECORDS FOR CATHODIC PROTECTION? (See pages 20-21):	**Respond all columns & rows**			
If you have impressed current systems or sacrificial anodes, you have the documentation of the last 2 inspection results conducted by a qualified cathodic protection tester within 6 months of installation, at least every 3 years thereafter, and within 6 months of a repair?				
If you have an impressed current system, you have documentation of the last three rectifier readings that need to be taken every 60 days to show that the rectifier is working properly? (Most USTs will share one rectifier.)				
Your UST has SPILL PROTECTION? (See pages 12-13):	**Respond all columns**			
UST has spill protection equipment, such as catchment basin?				
Your UST has OVERFILL PROTECTION? (See pages 14-15):	**Need at least one check in each column**			
UST has automatic shutoff device?				
UST has overfill alarm?				
UST has ball float valve?				

OTHER REQUIREMENTS for entire facility:	**Respond in each row for entire facility**
You have filed notification forms with the appropriate authority (see pages 7 and 26)?	
You keep records of all UST system repairs for the operating life of the UST system (see page 27)?	
If you have permanently closed any USTs, you satisfy the requirements for permanent closure (see pages 25 and 27) and keep site assessment results for 3 years?	
If you have temporarily closed any USTs, you satisfy the requirements for temporary closure (see page 25)?	
You have evidence of "Financial Responsibility" (see pages 2 and 5)?	

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