



Michigan Department of Environment, Great Lakes, and Energy
TSDf TANK SYSTEM INSPECTION FORM

Facility's Name _____ Part 6 Rules

Date _____ ID# _____ 1994 PA 451

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

NOTE: Rule 615 refers to 40 CFR 264, Subpart J, 264.190-264.231

GENERAL OPERATING REQUIREMENTS (Rule 615(1): 40 CFR 264)

(NI = Not Inspected, N/A = Not Applicable)

		YES	NO
1. Can wastes placed in tank system cause ruptures, leaks, corrosion or other failure? (264.194 (a))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
2. Controls & practices to prevent spills & overflows must include: (264.194(b))			
a) spill prevention controls. (264.194(b)(1))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
b) overfill prevention controls. (264.194(b)(2)).	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
c) freeboard in uncovered tanks to stop overtopping by wave or wind action or precipitation. (264.194 (b)(3)).	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A

NOTE: Response to leaks, spills and disposition of leaking or unfit-for-use tank systems is in 40 CFR 264.196.

3. A tank system or secondary containment system from which there has been a leak, spill or which is unfit for use, is it:			
a) removed from service immediately? (264.196)	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
b) completed requirements in 264.196(a-f)	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A

INSPECTIONS (Rule 615(1) : 40 CFR 264.195)

4. Where present, does the facility inspect at least once each operating day: (264.195(a))			
a) discharge, overflow/spill control equipment (daily)? (264.195(a)(1))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
b) monitoring equipment data (daily)? (264.195(a)(3))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
c) above ground portion of tank system (daily)? (264.195(a)(2))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
d) materials and area around tank (daily)? (265.194(a)(4))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
e) Are the inspections documented? (264.195 (c))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
5. Must inspect cathodic protection system, if present, for in-ground tanks:			
a) Cathodic protection within six months after initial installation (annually thereafter). (264.195 (b) (1))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
b) Impressed current inspected and/or tested at least bimonthly. (264.195 (b) (2))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
c) Are the inspections documented? (264.195(c))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A

SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE (Rule 615(1)(4)(5): 40 CFR 264.198)

6. Ignitable or reactive waste must not be placed in tanks unless:			
a) treated/mixed before or immediately after placed in the tank system, so: (264.198(a)(1))			
i) resulting mixture is no longer ignitable/reactive. (264.198(a)(1)(i))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
ii) does not cause environmental or structural damage to tank systems. (264.198(a)(1)(ii))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A

OR

b) waste stored/treated so it is protected from igniting or reacting. (264.198(a)(2))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
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OR

c) tank system is used solely for emergency. (264.198(1)(3))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
7. Observes National Fire Protection Association's buffer zone for tanks w/ ignitable or reactive wastes? (264.198(b)) (See tables 2-1 through 2-6 of NFPA's Flammable & Combustible Liquids Code - 1977" to determine compliance)	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A
8. Is the tank system designed, constructed, operated and maintained in conformance with requirements of Act 207, Michigan flammable liquid regulations. (Rule 615(4))	DTR	<input type="checkbox"/>	CO. SAID <input type="checkbox"/> NI N/A
9. Is the tank labeled in accordance with NFPA standard # 704? (Rule 615(5))	DTR	<input type="checkbox"/>	<input type="checkbox"/> NI N/A

INCOMPATIBLE WASTE (Rule 615(1) : 40 CFR 264.199)

YES NO

10. Are incompatible wastes stored in separate tanks? (264.199(a)) (If not, the provisions of 264.17(b) apply).	DTR	<input type="checkbox"/> __ NI N/A
11. Tank decontaminated before hazardous waste placed in it that held incompatible waste, unless 264.17(b). (264.199(b)).	DTR	<input type="checkbox"/> __ NI N/A

CLOSURE AND POST-CLOSURE (264.197)**NOTE:** At tank system closure refer to 264.197 for closure/post closure care, except 264.197(c).

12. If the tank system is closed, does the facility follow the requirements in 264.197? (264.197).	DTR	<input type="checkbox"/> __ NI N/A
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**EXISTING TANK SYSTEMS
REQUIREMENTS FOR EXISTING TANK(S) CONTAINING LIQUID WASTE
THAT DO NOT MEET THE REQUIREMENTS OF 264.193** (Rule 615)(2)

13. Are above ground tanks:		
a) paved, diked or cubed or otherwise enclosed to contain not less than 100% of the largest tank? (Rule 615(2)(a))	DTR	<input type="checkbox"/> __ NI N/A
b) Do incompatible wastes or interconnected tanks have 100% containment for each tank? (Rule 615(2)(a))	DTR	<input type="checkbox"/> __ NI N/A
14. For underground tanks:		
a) is there secondary containment and a leachate withdrawal system? (Rule 615(2)(b)(i))	DTR	<input type="checkbox"/> __ NI N/A
b) does facility complete an inventory of wastes not less than twice a month? (Rule 615 (2)(b)(ii))	DTR	<input type="checkbox"/> __ NI N/A
c) is leachate sampling analysis done at least once per year (if b shows loss, sample within 24 hours)? (Rule 615(2)(b)(iii))	DTR	<input type="checkbox"/> __ NI N/A

Note: If existing tanks do not have secondary containment meeting RCRA, the facility must assess the existing tank system's integrity, 265.191.**Note:** The determination that secondary containment does or does not meet the standards in 265.193 can be made by the company. It does not require a certification by an independent engineer.**Note:** Tanks w/out free liquids in a building w/ impermeable floor & tanks part of secondary containment system are exempt (265.190(a)&(b)).**ASSESSMENT OF EXISTING TANK SYSTEM'S INTEGRITY** (Rule 615(1) : 40 CFR 264.191)

15. If existing tank system (before 7/14/86) does not meet the secondary containment requirements in 265.193, was an assessment made and certified by an independent engineer? (264.191)	DTR	<input type="checkbox"/> __ NI N/A
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CONTAINMENT AND DETECTION OF RELEASES (Rule 615):40 CFR 264.193)

16. Until an existing tank is upgraded to meet the secondary containment requirements in 265.193 has the facility: (264.193(i))		
a) performed leak test meeting requirement of 264.191(b)(5) annually for non-enterable underground tank? (264.193(i)(1))	DTR	<input type="checkbox"/> __ NI N/A
b) For other than non-enterable underground tanks and ancillary equipment, the facility must:		
i) conduct an annual leak test that meets the requirements of 264.191(b)(5). (264.193(i)(2))	DTR	<input type="checkbox"/> __ NI N/A

OR

ii) do an internal inspection or other tank integrity exam by independent, qualified, reg. prof. engineer. (264.193(i)(2))	DTR	<input type="checkbox"/> __ NI N/A
17. Secondary containment & detection that meets the requirements, must be provided for: (264.193(a))		
a) new tank systems prior to being put into service (any tank installed after 7-14-86). (264.193(a)(1))	DTR	<input type="checkbox"/> __ NI N/A
b) existing tanks used for F020, F021, F022, F023, F026, F027 prior to 1/12/90. (264.193(a)(1))	DTR	<input type="checkbox"/> __ NI N/A
c) existing tanks w/ documented age before 1/12/90 or tanks 15 years of age, which is later. (264.293(a)(3)).	DTR	<input type="checkbox"/> __ NI N/A
d) existing tank system, w/out documented age, upgrades done by 1/12/96 unless facility is greater than 7 years in 1988, then ontainment provided before facility reaches 15 years or by 1/12/90 which is later. (264.193(a)(4))	DTR	<input type="checkbox"/> __ NI N/A
e) wastes which became hazardous waste after 1/12/87. (264.193(a)(5))	DTR	<input type="checkbox"/> __ NI N/A

**NEW TANK SYSTEMS AND UPGRADED EXISTING TANK SYSTEMS
(Rule 615(1) :40 CFR 264.193(c))**

18. Secondary containment and detection systems must have the following: (264.193(c))		
a) tank system constructed of compatible material with sufficient strength. (264.193(c)(1))	DTR	<input type="checkbox"/> __ NI N/A
b) adequate foundation / base. (264.193(c)(2))	DTR	<input type="checkbox"/> __ NI N/A
c) leak detection system designed/operated to detect leaks w/in 24 hours of earliest practical time. (264.193(c)(3)).	DTR	<input type="checkbox"/> __ NI N/A
d) sloped/drained & all liquid (leaks, precipitation) removed w/in 24 hours or in a timely manner. (264.193 (c)(4)).	DTR	<input type="checkbox"/> __ NI N/A
e) must include one or more of the following:		
i) a liner (external to tanks) which satisfies the following requirements. (264.193(d)(1))		
A) 100% capacity of largest tank within its boundary. (264.193(1)(i))	DTR	<input type="checkbox"/> __ NI N/A
B) prevent run-on or infiltration of precipitation unless excess of capacity. (264.193(e)(1)(ii))	DTR	<input type="checkbox"/> __ NI N/A
C) free of cracks or gaps. (264.193(e)(1)(iii))	DTR	<input type="checkbox"/> __ NI N/A

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