

Key Code*	CT UST Regulation Reference 22a-449(d)-	Trust Fund Application Section Reference	Specific Requirement in Regulation or Trust Fund Application Form	Questions to Determine Facility Compliance Status versus Specific Requirement
AD-1	1(d)(1) - (3)	III.A	Submit notification form (i.e., tank registration form EPHM-6) to DEP, plus local Fire Marshal.	<ul style="list-style-type: none"> • Was an EPHM-6 form filled out and sent to DEP? • Was a copy sent to the local Fire Marshal? • Was the form refiled when the tanks were tested for tightness or modifications made?.
AD-2	1(d)(1) - (3)	III.A	Keep copy of form on file at facility.	<ul style="list-style-type: none"> • Is there a copy of EPHM-6 available onsite?
AD-3	1(d)(2)	III.A; IV.A	File new form within 30 days after new tank installed (after 5/86).	<ul style="list-style-type: none"> • Was the EPHM-6 form refiled when the tanks were replaced? • Is there a copy of EPHM-6 available onsite?
AD-4	1(d)(1) - (3)		Make life expectancy determination; send to DEP.	<ul style="list-style-type: none"> • Was the manufacturer's warranty period used on the EPHM-6 form? • If old steel tanks and no warranty, was a 15-yr life expectancy cited on the EPHM-6 form? • If so, is a 15-yr life expectancy + 5-yr grace period used for planning and scheduling of tank removals/replacements?
AD-5	1(e)(1)(C)		Send tank installation certification to DEP (if tank installed after 5/86 effective date of first CT UST regs).	<ul style="list-style-type: none"> • Are tank installation certificates (e.g., sti-P3) available onsite? • Were they sent to DEP?
AD-6	1(d)(4)	IV.A	Submit tank registration form to DEP for removed/abandoned tank.	<ul style="list-style-type: none"> • Any tanks removed or abandoned? • Was the EPHM-6 form refiled to show these?
AD-7	---	III.B	List USTs onsite not subject to registration requirement.	<ul style="list-style-type: none"> • Any USTs onsite not subject to regulations (e.g., heating oil tanks for buildings, less than 2100 gal capacity)?
AD-8	---	III.C	List USTs onsite that were not registered, even though subject to registration requirement.	<ul style="list-style-type: none"> • Any tanks abandoned or replaced prior to regulations (5/86)? • Any small tanks (e.g., waste oil) not included on EPHM-6 form?

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AD-9	---	III.C	List tank identifier, date installed, last usage.	<ul style="list-style-type: none"> • Is all information on EPHM-6 form accurate?
AD-10	---	III.E	List tank emptying procedures after leak discovery.	<ul style="list-style-type: none"> • If a leak was detected and confirmed, was the tank pumped out?
AD-11	1(d)(5)		Report the results of tank tightness tests done prior to end of life tank expectancy to DEP and local Fire Marshal within 30 days.	<ul style="list-style-type: none"> • Was a copy of each tightness test result forwarded to DEP? • Was a second copy sent to the local Fire Marshal?
IC-1	1(g)(2)(A), (B)	IV.E.1	Keep daily inventory records for product dispensed and received, and assure records are accurate.	<ul style="list-style-type: none"> • Is there a log sheet that has entries for daily stick readings (open and close), daily meter readings, and delivered volumes? • Is there an automated inventory control system printout or log (e.g., VR TLS or equivalent)?
IC-2	1(g)(2)(A), (B)	IV.E.1	Keep accurate inventory records (valid tank volume calibration charts in use).	<ul style="list-style-type: none"> • Are tank calibration charts in use? • Are they provided in resolution of 1/8-inch?
IC-3	1(g)(2)(A), (B)	IV.E.2	Keep accurate inventory records (pump meters calibrated periodically).	<ul style="list-style-type: none"> • Are records kept of pump calibrations?
IC-4	1(g)(2)(A), (B)	IV.E.2	Keep accurate inventory records (inventory control system calibrated or checked periodically).	<ul style="list-style-type: none"> • Are records kept of checks or verifications of automated inventory control system?
IC-5	1(g)(2)(A), (B)	---	Keep accurate inventory records (tank stick in good condition, gradations in 1/8-inch intervals, liquid level data recorded to nearest 1/8-inch).	<ul style="list-style-type: none"> • Is the tank stick in good condition and does it have gradations in 1/8-inch intervals? • When the tanks are stuck, are liquid level data recorded to nearest 1/8-inch?
IC-6	1(g)(2)(A), (B)	IV.E.1; IV.E.2	Make weekly reconciliation of pumped amounts versus tank level readings (manual or automated).	<ul style="list-style-type: none"> • Are reconciliations done weekly? • Are they done monthly? • Are the reconciliation sheets available for the past 5 years?
IC-7	1(g)(2)(A), (B)	IV.E.1	Keep inventory records legible, complete and signed weekly with accuracy attestation.	<ul style="list-style-type: none"> • Are the reconciliation sheets reviewed and the numbers checked by station manager or other knowledgeable person? • Are they signed off as being accurate?

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IC-8	1(g)(2)(A), (B)	IV.E.1	Check water levels in tank daily.	<ul style="list-style-type: none"> • Is water-finding paste used daily? • Is it used weekly or monthly? • Is water level recorded on the inventory forms?
IC-9	1(g)(3)	IV.E.1	Maintain tank inventory control records (automated system or sticking) in facility files for past 5 years.	<ul style="list-style-type: none"> • Are records kept for 5 years?
PS-1	1(e)(1)(A), (B)	IV.B.1	Install only new tanks (after 11/1/85) that meet new tank performance standards.	<ul style="list-style-type: none"> • Any new tanks recently installed? • Do they meet the sti-P3 specification or other applicable specification?
PS-2	1(e)(1)(C)	IV.B.1	Install tanks per requirements of NFPA 30 or manufacturer's specifications.	<ul style="list-style-type: none"> • Are any tank installation certificates available onsite? • Available from the installer?
PS-3	1(e)(1)(D)	IV.B.1	Use cathodic protection system for tank and piping that meet manufacturer's specifications.	<ul style="list-style-type: none"> • If tanks are steel, is there a cathodic protection system on the tanks (sacrificial anode or rectifier)? • Is there a test point installed at ground level or other accessible location?
PS-4	1(e)(1)(E)	---	Test annually to verify tank-to-soil EMF of at least -0.85 vdc.	<ul style="list-style-type: none"> • Is there a logsheet or other documentation that a sacrificial anode system remains functional?
PS-5	1(e)(1)(E)	---	Keep monthly records of applied voltage and current for impressed current systems.	<ul style="list-style-type: none"> • Is there a logsheet or other documentation that a rectifier system remains functional?
PS-6	---	IV.B.2	Specify time periods during which new tank performance standards were not met.	<ul style="list-style-type: none"> • Are there periods when the cathodic protection system was not functional? • Are there periods when the cathodic protection system was not functional?
UM-1	1(e)(2)	IV.C.1; IV.C.3	Do not use tank if more than 5 years past life expectancy (unless modified to meet new tank performance standards).	<ul style="list-style-type: none"> • Are any tanks onsite more than 20 years old? • Are any tanks not meeting the new tank performance standards more than 5 years past their warranty period?

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UM-2	1(e)(3)	IV.C.1; IV.C.2	Do not move tank without DEP approval.	<ul style="list-style-type: none"> • Any tanks relocated? • Was the relocation reflected on a EPHM-6 form filed with DEP?
UM-3	1(g)(3)	IV.C.1; IV.C.2	Keep maintenance records on file of all work done on any tank system component for past five years.	<ul style="list-style-type: none"> • Are records of pump, valve or equipment repairs available?
TF-1	1(f)	IV.D.1	Disclose tank existence to buyer 15 days or more before sale (after 11/1/85).	<ul style="list-style-type: none"> • Has there been a sale or other transfer of the property after 11/85? • Was an appropriate disclosure made? • Is a copy available?
TT-1	1(i)(1)	IV.F.1	Use only a tightness test that can account for temperature expansion and provide accuracy within 0.05 gal/hr.	<ul style="list-style-type: none"> • Do testing certificates indicate that the test method complies with the NFPA 329 criterion of 0.05 gal/hr loss rate detection?
TT-2	1(i)(2)(A)	IV.F.1	Perform tank tightness test on FRP tank within 3 to 6 months after installation; and within 24 to 21 months and 12 to 9 months prior to end of life expectancy, and annually thereafter until removed.	<ul style="list-style-type: none"> • Any fiberglass or composite tanks installed after 5/86? • Were they tested after installation? • Is any tank within 2 years of expiration of its warranty? • Were they tested annually for 2 years prior to end of manufacturer's warranty period?
TT-3	1(i)(2)(B)	IV.F.1	Perform tank tightness test on cathodically-protected steel tank within 24 to 21 months and 12 to 9 months prior to end of life expectancy and annually thereafter until removed.	<ul style="list-style-type: none"> • Is any tank within 2 years of expiration of its warranty? • Were cathodically protected steel tanks tested annually for 2 years prior to end of manufacturer's warranty period?
TT-4	1(i)(2)(C)	IV.F.1	Perform tank tightness test on unprotected steel tank within 36 to 33 months, 24 to 21 months and 12 to 9 months prior to end of life expectancy and annually thereafter until removed.	<ul style="list-style-type: none"> • Is any unprotected steel tank within 3 years of the end of its life expectancy (15 years after installation)? • Were cathodically protected steel tanks tightness tested annually for 3 years prior to end of its life expectancy (i.e., beginning at year 12, and running to year 19 (if the 5-year grace period was used))?

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IR-1	1(g)(2)(E)	IV.E.1	Investigate apparent abnormal loss or gain.	<ul style="list-style-type: none"> Any indication in inventory records of unreconciled abnormal loss or gain? Any documentation or notes on how this was investigated and resolved?
IR-2	1(g)(2)(F) 1(j)(1)	IV.E.1; IV.G.1; IV.G.2	Report confirmed loss to DEP, per CGS 22a-450 (or subsequent spill reporting regulations).	<ul style="list-style-type: none"> Any spill reports made to DEP? Any followup actions taken as a result? Any documentation or chronology of events available?
IR-3	1(j)(2)	IV.H.1; V(1)	Empty tank and discontinue use, or properly remove, abandon, repair or replace.	<ul style="list-style-type: none"> If a loss to the soil was confirmed, was the tank pumped out and subsequently repaired or replaced? Any records or notes about what was done?
IR-4	1(j)(3)	IV.H.1; V(1); V(2); V(3); V(4); V(5); V(6); V(7)	Recover, reclaim and dispose of free product, contaminated soil and ground water.	<ul style="list-style-type: none"> Any consultant or contractor reports on the cleanup undertaken? Any documentation of expenses for cleanup?
IR-5	1(j)(4)	---	Evaluate other components for possible similar failure conditions.	<ul style="list-style-type: none"> Other tanks examined, especially if same age or in same excavation, or with similar piping/valving? Any documentation of this evaluation?
IR-6	---	IV.I	Take corrective actions per DEP or EPA administrative order, or per court order.	<ul style="list-style-type: none"> Any order from any regulatory agency? Is a copy available?
AF-1	1(k)(1)	IV.C.2; IV.H.1	Submit revised notification form (i.e., tank registration) to DEP, local Fire Marshal within 30 days of tank removal or abandonment.	<ul style="list-style-type: none"> Was EPHM-6 revised and sent to DEP to shown changes? Was a copy of revised EPHM-6 sent to local Fire Marshal?
AF-2	1(k)(2)	IV.H.1; IV.H.2	Abandon tanks only in accordance with NFPA 30.	<ul style="list-style-type: none"> Were tanks either removed or (if left in place) cleaned and then filled with sand?

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AF-3	---	IV.1	Keep closure records as required under 40 CFR 280.74.	<ul style="list-style-type: none"> • For tanks removed or abandoned in place, is there a closure report? • Does the report provide confirmatory sampling results per the DEP guideline? • Does the report meet the requirements for soil testing and confirmation of cleanup?

* The Key Code identifies the relevant type of compliance requirement in the regulations; this is simply for convenience and has no regulatory significance.

AD = administrative

IC = inventory control

PS = performance standards (for new tanks)

UM = use and maintenance

TF = transfer of property

TT = tank tightness testing

IR = investigation and remediation

AF = abandonment of facilities