

#	Physical Location(s)	Aspect Reviewed	Regulatory Requirement	Key Questions
1	Facility.	Underground storage tanks (USTs); registration form.	Register underground fuel USTs >2100 gal, or CERCLA hazardous chemical USTs >110 gal with DEP and local Fire Marshal. 40 CFR 280.22; RCSA 22a-449d-1(d)(1) and (7).	No underground oil or fuel USTs? No underground chemical UST for NaOH? If USTs onsite, registration form submitted? Are all onsite small or non-registered UST's known?
2	Facility.	Underground storage tanks (USTs); life expectancy.	Calculate UST life expectancy. RCSA 22a-449d-1(h)(2)(C)	Design/installation specs available? Life expectancy known, put on registration form? If unknown, 15 years entered on form?
3	Facility.	Underground storage tanks (USTs); cathodic protection.	Check and record cathodic protection system operability. 40 CFR 280.31, RCSA 22a-449d-1(i)(2)(C)	Cathodic protection test point accessible? Annual sacrificial anode readings taken? Monthly rectifier readings taken (if applicable)? Cathodic protection records on file at site? No gaps or problems noted in records?
4	Facility.	Underground storage tanks (USTs); tightness testing.	Test UST tightness annually, beginning 3 years before end of life expectancy. RCSA 22a-449d-1(i)(2)(C)	Testing requirement obviated by design of tanks? Annual testing accomplished on defined schedule? All tightness test records kept at the site (5 years)?
5	Facility.	Underground storage tanks (USTs); old tank removals.	Remove bare steel unprotected USTs more than 20 years old. RCSA 22a-449d-1(d)	Removal requirement obviated by design of tanks? Tanks removed if more than 20 years old? Replacement tanks meet new design standards?
6	Facility.	Underground storage tanks (USTs); soil checks at removal.	Close tank properly and check UST grave for contamination when tank is pulled. 40 CFR 280.71(a)	DEP sampling protocol followed (4 sides, 2 bottom)? All soil sample results okay? Depth of water table established? If contaminated, site investigated and cleaned up?
7	Facility, administration.	Underground storage tanks (USTs); operations.	Keep operations and maintenance records for USTs. 40 CFR 280.30, 280.50, 280.60; RCSA 22a-449d-(1)(c)(3) and (g)(1)	Procedure in place/followed for offloading fuels? Inventory control system or leak detection in place? Spills/overfills reported and cleaned up? Suspected releases reported and investigated? Maintenance / tank inventory records kept at site?
8	Facility.	Underground storage tanks (USTs); new tanks or upgrades.	Meet new tank performance standards (if installed after 1988), or be upgraded to meet new standards (before 1999). 40 CFR 280.20 and 280.41	Is there cathodic protection on tank and lines? Does each tank have spill and overflow protection? Was each tank installed properly, certificate on file? Does each tank have release detection capability? Do pump lines have leak detection capability?