



Greater Houston Retailers Cooperative Association, Inc.

How to Avoid Enforcement Action from the TCEQ

It is the responsibility of the store owner/operator to ensure environmentally safe operation of fuel dispensers and storage tanks. The Federal Energy Policy Act requires that the Texas Commission on Environmental Quality (TCEQ) perform an environmental evaluation of each gas station at least once every three years. Approximately 1/3 of gas stations will be inspected this year in the Greater Houston region. To avoid penalties and enforcement action, the following guidelines should be followed:

1. Fuel delivery, Registration, and Employee training certificates should be current.
2. Certificate of insurance should be current.
3. Release detection method should be able to detect leaks from both tanks and product supply lines. One of the following release detection methods will cover both the tank and product piping:
 - 3A: Annual tightness test on product lines equipped with automatic line leak detector (ALLD) and monthly Statistical Inventory Reconciliation (SIR) by a certified SIR vendor. Mechanical ALLD should be tested annually (by certified vendor), and electronic ALLD enables self test once a month.
 - 3B: Tank test report from Automatic tank monitor (at least once a month) including inventory control, monthly Leak Check, and annual piping test.
 - 3C: Interstitial monitoring of double wall tanks and product lines once/month.
 - 3D: Release detection by groundwater monitoring or vapor monitoring.
4. Ensure that annual and 3-year compliance tests are not expired.
5. Spill/overfill prevention equipment - Ball floats or overfill prevention drop tubes.
6. Clear all accessible manways of any debris, water, or product.
7. Ensure corrosion protection on steel tanks, 60-days rectifier sheet, and 3-year test.
8. Ensure color coat on spill buckets and product type and number tags on fill risers.
9. Maintain daily and monthly inspection and maintenance logs of Stage-II vapor recovery equipment and CARB executive order.
10. Check tanks for the presence of water at least once a month.

All testing and monitoring documents should be maintained on the site for at least 5 years and be readily available for inspection. Please call your fuel dispensers and storage tanks environmental consultant for any questions or additional information.