CASE STUDY 2

Texas Department of Transportation (TxDOT)
Internal Environmental Management Systems Supporting Project Development, Construction Operations, and Facility Operations

This page is intentionally left blank.

CASE STUDY 2

Texas Department of Transportation (TxDOT)
Internal Environmental Management Systems Supporting Project Development, Construction Operations, and Facility Operations

STATUS

Implemented (at least in part) – with an On-Going Process of Continuous Improvement.

FOCUS

TxDOT's overall focus is on regulatory compliance in the following major program areas:

Project Planning and Development – On-going development of a comprehensive project tracking system designed to track NEPA commitments, environmental permits and agency coordination during project planning. Primary Components: Environmental Tracking System (ETS) and Comprehensive Training.

Construction Operations – On-going development of multiple management practices designed to ensure NEPA commitments and permit conditions are met during project construction. Primary Components: District Environmental Quality Coordinator (DECQ) and Storm Water Advisory Team (SWAT).

Facility Operations – On-going development of multiple management practices designed to ensure compliance with environmental regulations affecting facility operations. Primary Component: Pollution Prevention and Abatement (PPA) Surveys.

DOT's BASIS FOR SELECTION OF FOCUS

TxDOT's vision statement includes the need to provide an environmentally sensitive transportation system that works together with the need to provide a comfortable, safe, durable, cost-effective, and aesthetically appealing state transportation system. In support of the environmental aspect of this vision statement, TxDOT has focused on the three broad operational areas listed above.

Focusing on the project planning and development process ensures that TxDOT will continuously improve its environmental planning procedures resulting in more timely, more accurate and overall more environmentally sensitive planning.

Focusing on construction and facility operations prevents non-compliance with environmental requirements and commitments that would result in regulatory fines and penalties and costly construction delays.

RELEVANCE TO THE EMS PROCESS ROADMAP

The process TxDOT uses to identify its needs and prioritize its efforts generally corresponds with the "Plan-Do-Check-Act" framework discussed in AASHTO's EMS guidance. However, the development of TxDOT's multiple environmental management systems has not been a simultaneous linear planning process. Rather it has been an on-going process of continuous improvement and modification that began with processes and programs already in place at TxDOT.

CASE STUDY 2

Texas Department of Transportation (TxDOT)
Internal Environmental Management Systems Supporting Project Development, Construction Operations, and Facility Operations

ACCOMPLISHMENTS AND BENEFITS

Project Planning and Development Highlights :

- TxDOT has developed a comprehensive Environmental Tracking System (ETS) that tracks projects throughout the planning stages to ensure the NEPA issues are addressed and environmental permits are coordinated before the project is released for construction.
- TxDOT design personnel can determine if all Environmental Permits, Issues and Commitments (EPIC) are addressed in the project plans by accessing ETS.
- By accessing ETS, TxDOT construction and maintenance personnel have realized the implications and importance of adhering to project environmental requirements and other environmental rules and laws and are able to take actions that prevent, or, at the least, minimize the environmental impacts and costs associated with nonconformance / noncompliance during the project construction stages.
- TxDOT's ETS also has created a near-paperless environment that allows many project papers to be saved, edited and circulated electronically, thereby reducing storage expenses and minimizing the time needed to retrieve files.
- ETS also calculates estimated process time for environmental clearance, ROW, and PS&E.
- The ETS has enabled TxDOT to involve the entire organization and account for all critical paths, some of which are not always obvious with the result that actions and plans are both efficient and effective.

Construction and Maintenance Project Highlights:

- TxDOT's 25 districts have been directed to name a District Environmental Quality Coordinator (DEQC) to perform environmental performance reviews for construction and maintenance projects using an established checklist to ensure all that all EPICs identified for a project and tracked in ETS are addressed properly during construction and maintenance projects.
- DEQCs are required to perform at least one review a year for projects with permits, formal consultation, or other mitigation requirements. DEQCs report findings to the district Area or Project Engineer and send a copy to the District Engineer.
- DEQCs are required to perform at least one inspection every six months on a randomly selected project for each area office for *other* construction projects. This review is primarily to address compliance with storm water permit requirements, ensure compliance with other environmental regulations and to increase uniformity in the required documentation used to demonstrate compliance with environmental regulations and requirements. Findings are reported to the Area or Project Engineer and copies to the District Director of Construction.

Texas Department of Transportation (TxDOT)
Internal Environmental Management Systems Supporting Project Development, Construction Operations, and Facility Operations

ACCOMPLISHMENTS AND BENEFITS (cont'd)

Construction and Maintenance Project Highlights (cont'd):

- DEQCs are required to perform at least one inspection every six months for maintenance section projects in each district area office. This review is primarily to address compliance with storm water permit requirements, ensure compliance with other environmental regulations and to increase uniformity in the required documentation used to demonstrate compliance with environmental regulations and requirements. The DEQC reports all findings to the Maintenance Supervisor, Area Engineer and the District Director of Maintenance.
- TxDOT's executive management also directed each district to conduct reviews for every ongoing construction project that involves formal resource agency consultations or US Army Corps of Engineers permits to ensure that avoidance, mitigation, or permit conditions are being met.

Storm Water Management Highlights:

- TxDOT has organized a Storm Water Advisory Team (SWAT) for the purpose of: 1) Ensuring that TxDOT is in full compliance with state and federal storm water regulations; 2) Providing guidance to the district offices regarding storm water management issues; 3) Assisting in the development of a model Storm Water Pollution Prevention Plan (SWP3) packet for TxDOT that could be utilized by all Districts, and 4) Assisting in the development of a coordinated and efficient Statewide Storm Water Management Program (SWMP).
- The SWAT uses a multi-pronged approach to achieve its goal, such as: conveying information through internal bulletins, providing training information for district staff, providing SW3P inspection assistance, gathering information about the effectiveness of BMPs, and generate ideas for overall improvements to storm water management.

  The SWAT is a multi-disciplinary team comprised of representatives from TxDOT's Design, Construction, Maintenance and Environmental Affairs Divisions who share their expertise and develop practical cost-effective solutions to meet the storm water management regulatory requirements.

Facility Operations Highlights:

- Pollution Prevention and Abatement (PPA) facility compliance surveys are conducted internally by TxDOT staff. The PPA survey process, which has evolved over the last few years, helps identify TxDOT district facilities that need improvement in PPA practices and thus prevents regulatory noncompliance and its associated costs and environmental impacts. District facility surveys are currently repeated on a two-year rotating schedule.
- The PPA surveys also identify good PPA practices that can be incorporated at other TxDOT facilities thus encouraging new ways to continuously improve PPA practices.
- The PPA survey process incorporates district "response forms" that provide a feedback mechanism regarding PPA improvements and corrective action being implemented following the survey. Implementing improved management practices result in higher compliance rates.

© 2003 – AASHTO Center for Environmental Excellence

CASE STUDY 2

Texas Department of Transportation (TxDOT)
Internal Environmental Management Systems Supporting Project Development, Construction Operations, and Facility Operations

ACCOMPLISHMENTS AND BENEFITS (cont'd)

Facility Operations Highlights (cont'd):

- Survey results are recorded on a Microsoft® Excel-based checklist form. Macros automatically transfer the survey results to a summary scoring table and generate a deficiencies table with corrective action steps and a response form for the district.
- Survey results also have highlighted areas where additional PPA resources and training programs are needed.

Environmental Training Highlights:

- To support its environmental efforts, TxDOT has developed a comprehensive series of introductory level and advanced environmental training courses for TxDOT staff. TxDOT's 17 environmental training courses provide staff with the necessary knowledge and skills to ensure compliance with TxDOT's Environmental Policy, the NEPA, and other state and federal regulations.
- The courses provide information to attendees so that they can effectively incorporate sound decision-making during project development and construction and facility operations.

IMPLEMENTATION NEEDS

TxDOT envisions adding functionality that would fully integrate and automate the current collection of environmental management systems. This includes a central repository for PPA surveys with the ability to make compliance updates online; a central repository for internal environmental policies, guidance and training as well as internet links to resource agencies' policies; and a central repository for job descriptions outlining environmental-related job duties and responsibilities. Additional staff time with the help of internal and/or external information technology resources are needed to begin this next step.

KEYS TO SUCCESS

- Visible commitment from senior management and committed technical level staff.
- Build environmental management systems a little at a time to balance the management system needs with other demands.
- Build on existing successful efforts already in place.
- Involve the whole organization, from top to bottom, on any issue involving environmental documentation, processes or compliance. Tracking NEPA processing is not enough; assuring compliance draws in personnel who learn how critical they are in meeting various rules and laws.
- In a large organization, environmental management systems have to account for all relevant critical paths associated with environmental documentation, processes or compliance that may exist within a large organization. Sometimes the paths are obvious, sometimes they aren't.

BACKGROUND, ADDITIONAL INFO

TxDOT's ETS was implemented several years ago and is being developed and enhanced a little at a time as a work in progress to balance the need for it against other demands. Implementation of the ETS has resulted in the development of tracking software and an interactive web-based manual that is available at http://manuals.dot.state.tx.us/dynaweb/coltrsys/env or portable document format at http://manuals.dot.state.tx.us/docs/coltrsys/forms/env.pdf .

CASE STUDY 2

Texas Department of Transportation (TxDOT)
Internal Environmental Management Systems Supporting Project Development, Construction Operations, and Facility Operations

BACKGROUND, ADDITIONAL INFO (cont'd)

As a work in progress, the ETS is continuously upgraded. Current efforts to improve the effectiveness of the ETS include the integration of compliance tracking and EPICs into project plan sheets.

TxDOT's DEQC program is relatively new and was developed to emphasize the environmental compliance side of the environmental process particularly during construction and maintenance projects. DEQC actions, duties and responsibilities for this position are under development by each of TxDOT's twenty-five district offices.

TxDOT's SWAT program initially began several years ago when the NPDES storm water construction general permit was first issued. The SWAT was reformed a few years ago when it became apparent that storm water management issues were becoming increasing complex and a permanent technical advisory team was needed. The SWAT currently is exploring the possibility of providing a "Storm Water" e-mail address that could link TxDOT districts to members of the SWAT. District staff could utilize this e-mail as a platform to post questions related to the NPDES permit, disseminate lessons learned, share good ideas, insights and experiences, and discuss common challenges.

The PPA surveys began several years ago in conjunction with TxDOT's health and safety inspection program. Current plans are to enhance TxDOT's on-line environmental facility guidance information into a more user friendly format that has a direct link with the PPA survey checklist. TxDOT also is exploring the development of comprehensive training program for TxDOT staff involved in environmental compliance for facility operations.

CONTACT(S)

Duncan Stewart, P.E., Section Director, Environmental Affairs Division, 512/416-3014, dstewart@dot.state.tx.us

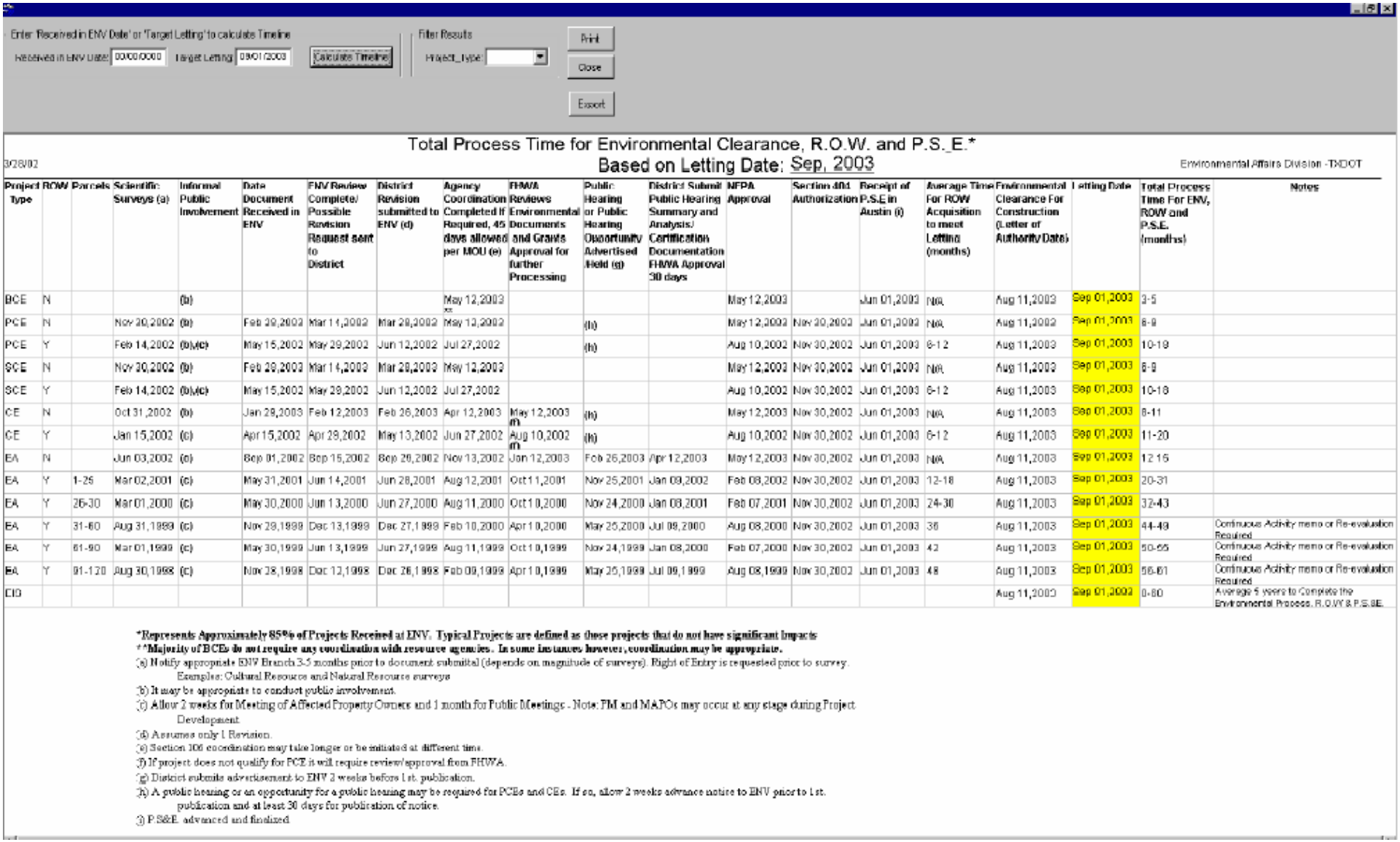
EXAMPLE TOOLS, PROCEDURES

Exhibit 1 provides an excerpt screen from TxDOT's Environmental Tracking System. In particular this screen shows how environmental reviews and clearances are tracked so that times can be shortened and events can be planned concurrently.

Exhibit 2 presents TxDOT's District Environmental Quality Coordinators Checklist.

Exhibit 3 presents the TxDOT's Pollution Prevention and Abatement Facility Compliance Checklist.

CASE STUDY 2 – Exhibit 1 – PAGE FROM TxDOT's ENVIRONMENTAL TRACKING SYSTEM



Enter 'Received in ENV Date' or 'Target Letting' to calculate Timeline

Received in ENV Date: 00/00/0000 Target Letting: 09/01/2003 Calculate Timeline

Filter Results: Project_Type:

Print | Close | Export

Total Process Time for Environmental Clearance, R.O.W. and P.S._E.*

Based on Letting Date: Sep, 2003

3/28/02 — Environmental Affairs Division -TXDOT

Project Type	ROW	Parcels	Scientific Surveys (a)	Informal Public Involvement	Date Document Received in ENV	ENV Review Complete/ Possible Revision Request sent to District	District Revision submitted to ENV (d)	Agency Coordination Completed If Required, 45 days allowed per MOU (e)	FHWA Reviews Environmental Documents and Grants Approval for further Processing	Public Hearing or Public Hearing Opportunity Advertised Held (g)	District Submit Public Hearing Summary and Analysis/ Certification Documentation FHWA Approval 30 days	NEPA Approval	Section 404 Authorization	Receipt of P.S.E in Austin (i)	Average Time For ROW Acquisition to meet Letting (months)	Environmental Clearance For Construction (Letter of Authority Date)	Letting Date	Total Process Time For ENV, ROW and P.S.E. (months)	Notes
BCE	N			(b)				May 12,2003 **				May 12,2003		Jun 01,2003	N/A	Aug 11,2003	Sep 01,2003	3-5	
PCE	N		Nov 30,2002	(b)	Feb 28,2003	Mar 14,2003	Mar 28,2003	May 12,2003		(h)		May 12,2003	Nov 30,2002	Jun 01,2003	N/A	Aug 11,2003	Sep 01,2003	6-9	
PCE	Y		Feb 14,2002	(b),(c)	May 15,2002	May 29,2002	Jun 12,2002	Jul 27,2002		(h)		Aug 10,2002	Nov 30,2002	Jun 01,2003	6-12	Aug 11,2003	Sep 01,2003	10-18	
SCE	N		Nov 30,2002	(b)	Feb 28,2003	Mar 14,2003	Mar 28,2003	May 12,2003				May 12,2003	Nov 30,2002	Jun 01,2003	N/A	Aug 11,2003	Sep 01,2003	6-9	
SCE	Y		Feb 14,2002	(b),(c)	May 15,2002	May 29,2002	Jun 12,2002	Jul 27,2002				Aug 10,2002	Nov 30,2002	Jun 01,2003	6-12	Aug 11,2003	Sep 01,2003	10-18	
CE	N		Oct 31,2002	(b)	Jan 28,2003	Feb 12,2003	Feb 26,2003	Apr 12,2003	May 12,2003 (f)	(h)		May 12,2003	Nov 30,2002	Jun 01,2003	N/A	Aug 11,2003	Sep 01,2003	8-11	
CE	Y		Jan 15,2002	(c)	Apr 15,2002	Apr 29,2002	May 13,2002	Jun 27,2002	Aug 10,2002 (f)	(h)		Aug 10,2002	Nov 30,2002	Jun 01,2003	6-12	Aug 11,2003	Sep 01,2003	11-20	
EA	N		Jun 03,2002	(c)	Sep 01,2002	Sep 15,2002	Sep 29,2002	Nov 13,2002	Jan 12,2003	Feb 26,2003	Apr 12,2003	May 12,2003	Nov 30,2002	Jun 01,2003	N/A	Aug 11,2003	Sep 01,2003	12-15	
EA	Y	1-25	Mar 02,2001	(c)	May 31,2001	Jun 14,2001	Jun 28,2001	Aug 12,2001	Oct 11,2001	Nov 25,2001	Jan 09,2002	Feb 08,2002	Nov 30,2002	Jun 01,2003	12-18	Aug 11,2003	Sep 01,2003	20-31	
EA	Y	26-30	Mar 01,2000	(c)	May 30,2000	Jun 13,2000	Jun 27,2000	Aug 11,2000	Oct 10,2000	Nov 24,2000	Jan 08,2001	Feb 07,2001	Nov 30,2002	Jun 01,2003	24-30	Aug 11,2003	Sep 01,2003	32-43	
EA	Y	31-60	Aug 31,1999	(c)	Nov 29,1999	Dec 13,1999	Dec 27,1999	Feb 10,2000	Apr 10,2000	May 25,2000	Jul 09,2000	Aug 08,2000	Nov 30,2002	Jun 01,2003	36	Aug 11,2003	Sep 01,2003	44-48	Continuous Activity memo or Re-evaluation Required
EA	Y	61-90	Mar 01,1999	(c)	May 30,1999	Jun 13,1999	Jun 27,1999	Aug 11,1999	Oct 10,1999	Nov 24,1999	Jan 08,2000	Feb 07,2000	Nov 30,2002	Jun 01,2003	42	Aug 11,2003	Sep 01,2003	50-55	Continuous Activity memo or Re-evaluation Required
EA	Y	91-120	Aug 30,1998	(c)	Nov 28,1998	Dec 12,1998	Dec 26,1998	Feb 09,1999	Apr 10,1999	May 25,1999	Jul 09,1999	Aug 08,1999	Nov 30,2002	Jun 01,2003	48	Aug 11,2003	Sep 01,2003	56-61	Continuous Activity memo or Re-evaluation Required
CID																Aug 11,2003	Sep 01,2002	0-60	Average 5 years to Complete the Environmental Process. R.O.W.& P.S.&E.

***Represents Approximately 85% of Projects Received at ENV. Typical Projects are defined as those projects that do not have significant impacts**

****Majority of BCEs do not require any coordination with resource agencies. In some instances however, coordination may be appropriate.**

(a) Notify appropriate ENV Branch 3-5 months prior to document submittal (depends on magnitude of surveys). Right of Entry is requested prior to survey. Examples: Cultural Resource and Natural Resource surveys

(b) It may be appropriate to conduct public involvement.

(c) Allow 2 weeks for Meeting of Affected Property Owners and 1 month for Public Meetings - Note: PM and MAPOs may occur at any stage during Project Development

(d) Assumes only 1 Revision.

(e) Section 106 coordination may take longer or be initiated at different time.

(f) If project does not qualify for PCE it will require review/approval from FHWA.

(g) District submits advertisement to ENV 2 weeks before Ltr. publication.

(h) A public hearing or an opportunity for a public hearing may be required for PCEs and CEs. If so, allow 2 weeks advance notice to ENV prior to Ltr. publication and at least 30 days for publication of notice.

(i) P.S&E. advanced and finalized

Case Study 2 - Exhibit 2 – District Environmental Quality Coordinators (DECQ) Checklist

ENVIRONMENTAL COMMITMENT CHECKLIST
For Construction, Maintenance and Facilities Projects

PROJECT:		**DATE:**
CSJ:		**DEQC:**
HIGHWAY:		*Name*

I. Storm Water Pollution Prevention

A. Required Information and Documentation

1. Does the construction site have a Storm Water Permit? Yes ☐ No ☐* N/A ☐
2. Is a notice posted in a publicly accessible location near where construction is actively underway (and moved as necessary)? Yes ☐ No ☐* N/A ☐
3. Does the notice contain the following information:
   a. The permit number or a copy of the NOI? Yes ☐ No ☐* N/A ☐
   b. The name and telephone number of a local contact person? Yes ☐ No ☐* N/A ☐
   c. A brief description of the project? Yes ☐ No ☐* N/A ☐
   d Location of SW3P (Job site or other location). Yes ☐ No ☐*
4. Is there a copy of the Construction General Permit in the SW3P? (a copy of the Federal Register is sufficient) Yes ☐ No ☐* N/A ☐
5. Is there a copy of a Delegation of Authority Letter authorizing the inspector to sign inspection reports in the SW3P file? Yes ☐ No ☐* N/A ☐
6. Is the SW3P retained on-site at the facility that generates the storm water? (If no, where is it located _____)? Yes ☐ No ☐* N/A ☐
7. Is the SW3P updated and documented in the plans as necessary to remain consistent with any changes in design, construction, operation, or maintenance applicable to protecting surface water resources in sediment and erosion site plans or site permits, or storm water management site plans or site permits approved by State, Tribal or Local Officials for which the permittee receives notice? Yes ☐ No ☐* N/A ☐

8. Is the description of construction and waste materials expected to be stored on-site updated? Yes ☐ No ☐* N/A ☐
9. Are the following records maintained and available for inspection, or included in the SW3P?
   a. Dates when major grading activities occur? Yes ☐ No ☐* N/A ☐
   b. Dates when construction activities temporarily or permanently cease on a portion of the site? Yes ☐ No ☐* N/A ☐
   c. Dates when stabilization measures are initiated? Yes ☐ No ☐* N/A ☐
10. Did stabilization occur within 14 days at locations where soil disturbing activities have ceased or will cease for at least 21 days or were temporary measures installed? Yes ☐ No ☐* N/A ☐

B. General Conditions

1. Are Best Management Practices (BMPs) being utilized? Yes ☐ No ☐* N/A ☐
2. Are silt fences, buffer strips, or equivalent sediment controls at a minimum used for all side-slope and down-slope boundaries of the construction area? Yes ☐ No ☐* N/A ☐

C. Controls & Measures

1. Have erosion and sediment controls been designed to retain sediment on-site to the extent practical during the construction phase? Yes ☐ No ☐* N/A ☐
2. Were control measures, in accordance with manufacturer specifications and good engineering practices:
   a. Properly selected? Yes ☐ No ☐* N/A ☐
   b. Properly installed? Yes ☐ No ☐* N/A ☐
   c. Properly maintained? Yes ☐ No ☐* N/A ☐
   d. In effective operating conditions? Yes ☐ No ☐* N/A ☐
3. Are controls in place to minimize:
   a. Dust generation? Yes ☐ No ☐* N/A ☐
   b. Off-site vehicle tracking of sediments? Yes ☐ No ☐* N/A ☐
4. Are off-site accumulations of sediment removed at a frequency sufficient to minimize off-site impacts? (sediment near off-site inlets, etc) Yes ☐ No ☐* N/A ☐
5. Is sediment removed from the sediment traps or sediment ponds when design capacity is reduced by 50%? Yes ☐ No ☐* N/A ☐

6. Are litter, construction debris, and construction chemicals exposed to storm water prevented from becoming a pollutant source from storm water discharges? (e.g., screening outfalls, picked up daily) Yes ☐ No ☐* N/A ☐

7. Are solid materials including building materials being discharged? (except those authorized by a permit issued under section 404 of the CWA) Yes ☐* No ☐ N/A ☐

8. Were velocity dissipation devices (i.e. rock filter dams, holding ponds, etc) placed at discharge locations and along the length of any outfall channel to provide a non-erosive flow velocity from the structure to the water course? Yes ☐ No ☐* N/A ☐

D. Inspections

1. Were the inspections performed at least once every 14 calendar days and within 24 hours of the end of a 0.5 inch or more rain event (or once every 30 days in areas with less than an average 20 inches of rainfall per year)? (*Note: some projects may require more frequent inspections, refer to the plans*). Yes ☐ No ☐* N/A ☐

2. Did the inspector check the following:
   a. Disturbed areas of the construction site that have not been stabilized? Yes ☐ No ☐* N/A ☐
   b. Areas used for storage of materials that are exposed to precipitation? Yes ☐ No ☐* N/A ☐
   c. Structural control measures? Yes ☐ No ☐* N/A ☐
   d. Locations where vehicles enter or exit the site? Yes ☐ No ☐* N/A ☐

3. Based on the inspection, are the SW3P Sheet and SW3P Layouts modified within 7 calendar days following the inspection? Yes ☐ No ☐* N/A ☐

   Is it documented and available for inspection? Yes ☐ No ☐* N/A ☐

4. Based on the inspection, are controls and measures modified or added before the next anticipated storm event (or as soon as practicable)? Yes ☐ No ☐* N/A ☐

5. Did the inspection Summary Report include:
   a. The name of the inspector? Yes ☐ No ☐* N/A ☐
   b. The date(s) of the inspection? Yes ☐ No ☐* N/A ☐
   c. Measures/area inspected? Yes ☐ No ☐* N/A ☐
   d. Actions needed/taken as a result of the inspection? Yes ☐ No ☐* N/A ☐
   e. Signature of inspector with certification statement? Yes ☐ No ☐* N/A ☐
   f. Inspector properly delegated in writing to EPA? Yes ☐ No ☐* N/A ☐

II. Water Resources Compliance

A. USAC Permits

1. US Army Corps of Engineers (USACE) Permits: Does the project have a USACE (Section 10 or Section 404) permit?	Yes ☐	No ☐	N/A ☐
a. If yes, is a copy of the permit kept onsite (in the form of Nationwide Permit text and/or a letter or other documents from the USACE)?	Yes ☐	No ☐*	N/A ☐
b. Are any Project Specific Locations, on or off Right-of-Way, that are *directly related to the USACE permit* addressed in the permit or Corps letters to the contractor (for off ROW PSLs)?	Yes ☐	No ☐*	N/A ☐
c. Has clearance been obtained for any changes in design or construction methods in the areas covered by the permit?	Yes ☐	No ☐*	N/A ☐
d. Does the project meet all conditions listed in the permit?	Yes ☐	No ☐	N/A ☐
2. Is a copy of the completed Section 401 Water Quality Certification Tier I checklist (or other specific Section 401 requirements) attached to the permit?	Yes ☐	No ☐*	N/A ☐
a. Does the project have the BMPs installed as designated in the Tier I checklist or as otherwise specified?	Yes ☐	No ☐*	N/A ☐
b. Are the BMPs working effectively? (If not, immediately bring the problem to the attention of the project engineer)	Yes ☐	No ☐*	N/A ☐
c. Are there wetlands on the project site?	Yes ☐	No ☐	N/A ☐
d. Are wetlands that are required to be preserved by the USACE permit being effectively protected?	Yes ☐	No ☐*	N/A ☐

B. Other Water Requirements

1. Does the project require an Edwards Aquifer Protection Plan (for central Texas counties Kinney, Uvalde, Medina, Bexar, Comal, Hays, Travis, & Williamson only)	Yes ☐	No ☐	N/A ☐
a. If yes, is a copy of the Water Abatement Plan kept on-site?	Yes ☐	No ☐*	N/A ☐
b. Are all appropriate conditions affecting construction being met?	Yes ☐	No ☐*	N/A ☐
2. Does the project have a US Coast Guard Section 9 permit?	Yes ☐	No ☐	N/A ☐
a. If yes, is a copy of the permit kept onsite?	Yes ☐	No ☐*	N/A ☐
b. Are all appropriate conditions affecting construction being met?	Yes ☐	No ☐*	N/A ☐
3. Does the Project fall under the requirement of the Texas Coastal Management Plan?	Yes ☐	No ☐*	N/A ☐
If yes, are all appropriate conditions affecting construction being met?	Yes ☐	No ☐*	N/A ☐

III. Other Environmental Requirements

A. Vegetation Management

1.	Are there any mitigation issues involving vegetation impacts?	Yes ☐	No ☐	N/A ☐
2.	Is the ROW to be used for mitigation?	Yes ☐	No ☐	N/A ☐
3.	Is there any vegetation that requires fencing, or other protection, to preserve it from damage or removal?	Yes ☐	No ☐	N/A ☐
4.	Are there any vegetative management issues within the project?	Yes ☐	No ☐	N/A ☐
5.	Has project been coordinated with district environmental staff before removal of trees/shrubs within proposed ROW?	Yes ☐	No ☐*	N/A ☐
6.	Has project been coordinated with district environmental staff to salvage native plants in project area?	Yes ☐	No ☐*	N/A ☐
7.	Invasive species addressed as required?	Yes ☐	No ☐*	N/A ☐
8.	Is revegetation/landscaping with native grasses and shrubs in accordance with project plans?	Yes ☐	No ☐*	N/A ☐
9.	Are recycled plant trimmings to be used as mulch and to reduce runoff?	Yes ☐	No ☐*	N/A ☐
10.	Is any stockpiled organic layer of soil from existing wetlands to be used on mitigation site?	Yes ☐	No ☐*	N/A ☐
11.	Are the wetlands to be preserved already delineated?	Yes ☐	No ☐*	N/A ☐

B. Noise

1.	Are there any noise level concerns within the project?	Yes ☐	No ☐	N/A ☐
2.	Minimized construction noise:			
	a. In residential areas	Yes ☐	No ☐*	N/A ☐
	b. In sensitive receptors in area.	Yes ☐	No ☐*	N/A ☐

C. Historical And Archeological

1.	Are there any historical or archeological issues in the PS&E?	Yes ☐	No ☐	N/A ☐
2.	Archeological survey to be conducted during/after ROW purchase. Parcel #_____	Yes ☐	No ☐	N/A ☐
3.	Are there any archeological surveys needed to be done on outstanding parcels? Parcel #_____.	Yes ☐	No ☐	N/A ☐
4.	Are there any archeological sites that must be avoided until mitigation is complete and THC concurs no additional work is required prior to construction?	Yes ☐	No ☐	N/A ☐
5.	Are there any designated avoidance areas?	Yes ☐	No ☐	N/A ☐

6.	If yes, are they delineated such that they are not disturbed? (If disturbed, notify project engineer immediately)	Yes ☐	No ☐*	N/A ☐
7.	Are there any historical elements to be salvaged or protected? (i.e. bridge plaques or historic bridge rail)	Yes ☐	No ☐	N/A ☐
8.	If any archeological evidence were discovered during the course of construction (bones, burnt rock, flint, pottery), were the TxDOT Emergency Discovery Guidelines followed?	Yes ☐	No ☐	N/A ☐

D. Change Orders

1.	Has the district environmental staff reviewed all draft change orders to determine whether an environmental analysis and/or resource agency coordination is necessary?	Yes ☐	No ☐*	N/A ☐
2.	If any environmental analyses are required, has it received clearance?	Yes ☐	No ☐*	N/A ☐

E. Federal Listed and Proposed Threatened and Endangered Species, Critical Habitat, State Listed Species, and Candidate Species

1.	Are there any listed species, etc., within project limits?	Yes ☐*	No ☐	N/A ☐
2.	Is there designated critical habitat in the project area?	Yes ☐*	No ☐	N/A ☐
3.	Was there consultation with the U. S. Fish and Wildlife Service and/or National Marine Fisheries Service for the project?	Yes ☐	No ☐	N/A ☐
4.	If yes to 1, 2, or 3, are there any commitments or requirements for on-site mitigation for endangered species?	Yes ☐	No ☐	N/A ☐
	a. Are they being done properly?	Yes ☐	No ☐	N/A ☐
5.	Are there any species/wildlife commitments for scheduling the construction activities for the project?	Yes ☐	No ☐	N/A ☐
	a. If yes, are they complied with?	Yes ☐	No ☐	N/A ☐
6.	Are there any requirements for species monitoring during construction?	Yes ☐	No ☐	N/A ☐
	a. If yes, are they complied with?	Yes ☐	No ☐	N/A ☐
7.	Are there any commitments for state listed species within the limits of the project?	Yes ☐	No ☐	N/A ☐
8.	Does the inspector have a current list of species on the “watch list” for the project?	Yes ☐	No ☐*	N/A ☐
9.	Are pictures and descriptions that help identify these species available on the project?	Yes ☐	No ☐*	N/A ☐
10.	Have any of the species been spotted on the project site during construction?	Yes ☐*	No ☐	N/A ☐
11.	Do TxDOT and Contractor staff know what they do if they see a listed species on-site?	Yes ☐	No ☐	N/A ☐

F. Essential Fish Habitat

1.	Is there any essential fish habitat within project limits?	Yes ☐*	No ☐	N/A ☐
2.	Is there designated essential fish habitat in the project area?	Yes ☐*	No ☐	N/A ☐
3.	Was there consultation with the U. S. Fish and Wildlife Service and/or National Marine Fisheries Service for the project?	Yes ☐	No ☐	N/A ☐
4.	If yes to 1, 2, or 3, are there any commitments or requirements for on-site mitigation for essential fish habitat?	Yes ☐	No ☐	N/A ☐
	a. Are they being done properly?	Yes ☐	No ☐	N/A ☐
5.	Are there any essential fish habitat commitments for scheduling the construction activities for the project?	Yes ☐	No ☐	N/A ☐
	a. If yes, are they complied with?	Yes ☐	No ☐	N/A ☐

G. Natural Habitat Commitments

1.	Are there any commitments for natural habitat mitigation in the right of way other than vegetation management issues?	Yes ☐	No ☐	N/A ☐
2.	Are the mitigation commitments stated in the project plans?	Yes ☐	No ☐	N/A ☐

H. Migratory Birds

1.	Are there any concerns that migratory birds are nesting within project limits?	Yes ☐*	No ☐	N/A ☐
2.	Have migratory birds or nests been noticed on the project in such a situation that a 'take' of the birds might occur?	Yes ☐*	No ☐	N/A ☐
3.	If a migratory bird ‘take’ might occur, has coordination with the resource agencies cleared the action?	Yes ☐	No ☐	N/A ☐

I. Hazardous Materials

1.	Are there any hazardous materials on the site or are there plans to use any hazardous materials during construction?	Yes ☐*	No ☐	N/A ☐
2.	Is there evidence of hazardous materials not identified in the PS&E? (for example underground storage tanks, containers, spills)	Yes ☐*	No ☐	N/A ☐

If yes, immediately contact the Area Engineer.

Case Study 2 -Exhibit 3 – Facility Compliance Checklist

Texas Department of Transportation
Facility Compliance Checklist for Maintenance Sections

Date: _____

District: _____ **ENV Contact** _____

Facility: _____ **District Contact** _____

Category	Area Reviewed	NI	NA	Yes	No	Action	Standard	Reference
Used Oil	Is there a designated used oil and used oil filter drum/tank?					RQD	Used oil must be stored in a dedicated tank or drum. The container must be labeled USED OIL.	40 CFR §279.22 - Used Oil Storage
Used Oil	Are containers covered/lids fastened and in good condition?					RQD	Keep lids and covers closed when used oil tank is not being filled.	40 CFR §279 - Used Oil Rules; 40 CFR §279.22 - Used Oil Storage
Used Oil	Is secondary containment in place for storage area?					BMP or RQD	Construct a secondary containment berm equipped with a drain pipe and lockable valve. Secondary containment is required if the facility has a SPCC plan and the used oil storage container capacity is 55 gallons or greater.	40 CFR §112 - Oil Pollution Prevention; 30 TAC §324.28 - Spill Prevention and Control
Used Oil	Are the used oil collection and storage areas generally spill-free?					BMP	Handle used oil in a manner so that spills are minimized. Spilled oil leads to polluted storm water discharge.	30 TAC §324 - Used Oil Rules;Texas Water Code Section 26.121- Unauthorized discharge prohibited
Used Oil	Are empty oil and grease containers stored/disposed of properly?					BMP	Oil jugs and containers should be emptied by normal mechanical means. Emptied containers can be collected for recycling, if this service is available, or may be disposed of into the dumpster.	Guidance Manual - House Keeping - Disposing of Containers
Used Oil	Does the facility prevent the mixture of other waste fluids with the used oil?					BMP	Used Oil Mixed with Fuels: Mixtures of used oil with fuel or fuel products are subject to regulation as used oil under 40 CFR 279. Used Oil Mixed with Hazardous Waste: While certain mixtures of hazardous waste with used oil are allowed, such mixtures should not be routinely allowed . Unless the mixture rules are strictly followed, there is a high potential that the mixture will be classified as hazardous waste once mixed. If hazardous waste is routinely mixed with the used oil, the facility should have sufficient documentation to support that the mixture is allowed to be managed as used oil and not hazardous waste.	40 CFR 279.10(b) & (d)
Used Oil	When internally transporting used oil, does the facility ensure it transports less than one 55 gallon drum of used oil at any time?					RQD	Used oil generators may self transport up to 55 gallons of used oil to a licensed or permitted collection center or to an aggregation collection point that belongs to TxDOT.	40 CFR 279.24
Used Oil	If the facility is required to maintain a SPCC plan, is the facility's used oil storage tank(s) or storage drums included in the SPCC plan.					RQD	Used oil generators are subject to all applicable SPCC requirements included in 40 CFR part 112.	40 CFR 279.22

Texas Department of Transportation
Facility Compliance Checklist for Maintenance Sections

Used Oil	Is the used oil storage tanks/ containers in good condition (no severe rusting, apparent structural defects or deterioration) and not leaking.					RQD	Containers and above ground tanks used to store used oil must be in good condition (no severe rusting, apparent structural defects or deterioration) and not leaking (no visible leaks).	40 CFR 279.22(b)(1),(2)
Used Oil	Are the used oil storage tanks/containers and any associated fill pipes used to transfer used oil to the storage tank/container clearly labeled with the words "Used Oil"					RQD	Used oil storage tanks/containers and any associated fill pipes used to transfer used oil to the storage tank/container must be clearly labeled with the words "Used Oil"	40 CFR 279.22(c)(1)(2)
Used Oil	Comment Section Used Oil:							
Used Oil Filters	Does the facility store six or fewer 55 gallon drums of filters at any one time?					RQD	Facilities may not store used oil filters that in the aggregate have a volume greater than six 55 gallons drums unless the facility is a registered used oil storage facility.	TAC 371.104(a) & (b)(1)
Used Oil Filters	Does the district/facility maintain copies of the bills of lading for the transported used filters for a period of three years?					RQD	Facilities shipping used oil filters off-site must maintain a copy of the bills of lading for a period of at least three years after the date the filters were transported off-site.	TAC 371.105(a) & (b)
Used Oil Filters	Does the district/facility maintain records indicating that the used oil filter transporter is a TCEQ/EPA registered transporter (Not necessary if facility is self transporting one 55 gallon drum or less)?					RQD	A transporter, storage facility, or processor may not store, process, recycle or dispose of used oil filters unless they are registered with the TCEQ.	TAC 371.104
Used Oil Filters	Is oil drained from the used oil filters before storage.					RQD	All free flowing oil must be removed from used oil filters in order to be exempt from being hazardous waste due to draining of used oil per Title 40 Code of Federal Regulations, §261.4(b)(13)	TAC 328.22
Used Oil Filters	Are used oil filter storage drums marked with the words "Used Oil Filters"					BMP	All used oil filter storage drums should be marked with the words "Used Oil Filters"	Guidance Manual - House Keeping - Container Management
Used Oil Filters	Comment Section Used Oil Filters:							
Used Antifreeze	Is used antifreeze stored in properly labeled drum or container with lid fastened and in good condition?					BMP	Label the contents of the container storing used antifreeze. Keep containers closed when not in use to minimize the potential for rainwater, solvents or other chemicals to be mixed with the used antifreeze.	Guidance Manual - House Keeping - Container Management
Used Antifreeze	Is the used antifreeze stored in a location away from floor drains?					BMP	Store used antifreeze in locations where it is not likely to enter a storm drain or discharge to a septic tank/leach field if accidentally spilled. It is recommended that used antifreeze be stored in same containment area as used oil.	Guidance Manual - Waste Generated During Vehicle Maintenance - Handling Used Antifreeze
Used Antifreeze	Is antifreeze collected for recycling by the district shop or contractor?					BMP	Antifreeze not collected for recycling is considered a solid waste, which must be analyzed for hazardous constituents prior to disposal.	30 TAC §335.62 – Hazardous Waste Determination 40 CFR §262.11- Hazardous Waste Determination

Texas Department of Transportation
Facility Compliance Checklist for Maintenance Sections

Used Antifreeze	Comment Section Used Antifreeze:							
Lead Acid Batteries	Used batteries stored on pallets?					BMP	Store batteries on wooden pallets outside (or inside in a large open area).	Guidance Manual - Waste Generated During Vehicle Maintenance - Lead Acid Batteries
Lead Acid Batteries	Storage area covered and secured?					BMP	Used batteries should be stored in a covered area to minimize the mixing of rainwater and battery acid from leaking batteries. Damaged or leaking batteries should be collected for recycling as soon as practical.	Guidance Manual - Waste Generated During Vehicle Maintenance - Lead Acid Batteries
Lead Acid Batteries	Are batteries taken to a battery recycling facility or district complex?					RQD	Batteries are considered a hazardous waste unless collected for recycling. The district should have a contract in place to have the batteries collected by a battery recycler registered with the TCEQ.	30 TAC §328.13 - Disposal of Batteries; 30 TAC §335.62 – Hazardous Waste Determination
Lead Acid Batteries	Comment Section Lead Acid Batteries:							
Scrap Tire Management	Does the facility have scrap tires collected on a regular basis by a registered scrap tire transporter?					RQD	Contact district purchaser to arrange for a contract to collect the scrap tires. If needed, contact the GSD Recycling Program for assistance in locating a scrap tire vendor for the facility location. The transporter must be registered with the TCEQ.	30 TAC §328.55 - Registration Requirements; 30 TAC §328.58 - Manifest System; Guidance Manual - Waste Generated During Vehicle Maintenance
Scrap Tire Management	Are scrap tires transported to a authorized facility/permitted landfill?					RQD	Check the district scrap tire disposal contract to determine where the used tires are going. Tires picked up from a TxDOT facility must be taken to a facility registered with the TCEQ. Only split, quartered or shredded tires may be disposed of in a landfill.	30 TAC §328.55 - Registration Requirement; 30 TAC §330.58 - 330.65 Permit Required

Texas Department of Transportation
Facility Compliance Checklist for Maintenance Sections

Scrap Tire Management	Are Scrap tires pickups properly manifested?						The generator and every facility handling the tires must keep a copy of the manifest for each load. Manifests are maintained in the following manner: 1.The generator completes and signs the first section of the manifest showing how many tires were picked up. 2. The transporter signs the manifest and leaves a copy with the generator. 3. When the tires are delivered to a permitted landfill or an authorized scrap tire facility, the final sections of the manifest are completed showing how many tires were disposed of at the facility. 3. The completed manifest must be returned to the generator within 60 days after the scrap tires were transported off site. 4 Generators must notify the appropriate TCEQ regional office within 90 days of when the tires were picked up if any transporter or authorized scrap tire facility: failed to complete the manifest; altered the generator portion of the manifest, or did not return the manifest to the generator within 60 days of when the tires were picked up at the generator's facility. These facilities must keep documentation on file for a period of three years.	Chapter 328 - Waste Minimization and Recycling SUBCHAPTER F: MANAGEMENT OF USED OR SCRAP TIRES §§328.51 - 328.71
Scrap Tire Management	Comment Section Scrap Tire Management:							
House Keeping	Are storage containers labeled, covered with secured lids, and in good condition?					BMP	Instruct facility personnel to protect waste or product containers from rainwater accumulation and accidental spillage (overfilling) by keeping containers covered with proper lids when not in use. Label each tank and storage container with contents.	BMP & Guidance Manual - House Keeping - Container Management
House Keeping	Are containers and tanks stored away from drainage systems and storm water pathways?					BMP	Place containers away from storm drains or ditches to minimize the potential for polluted storm water runoff, in the event of an accidental spill.	BMP & Texas Water Code Section 26.121 Unauthorized Discharge Prohibited
House Keeping	Do work practices keep oil contaminated runoff from occurring off-site?					BMP	Modify existing work practices to prevent polluted runoff from leaving TxDOT property.	BMP & Texas Water Code Section 26.121 - Unauthorized Discharge Prohibited
House Keeping	Are new oil and grease containers stored using some form of secondary containment (spill pallets or absorbents?					BMP	Use drip pans and sorbent pads beneath containers storing oils and lubricants. Spill pallets are also available in a variety of sizes and should be used if available at the District warehouse.	BMP & Guidance Manual - House Keeping - Waste Storage Locations
House Keeping	Are work areas generally leak and spill free?					BMP	Keep floors and work areas free of spilled materials by handling materials in such a way that the potential for spills to occur is minimized. Initiate the cleanup of spilled materials or wastes in a timely manner to prevent additional worker safety hazards.	BMP & Guidance Manual - Small Spill Response - Small Spill Cleanup, Housekeeping - Container Management

Texas Department of Transportation
Facility Compliance Checklist for Maintenance Sections

House Keeping	Are clean up wastes (absorbents and shop rags) properly stored?					BMP	Spill cleanup waste should be containerized and disposed of in a timely manner. Absorbents and rags can be disposed of into the dumpster in small amounts, as long as there is no sign of free-flowing oil. Cleanup waste for large spills must be containerized and analyzed prior to disposal.	30 TAC §335.62 – Hazardous Waste Determination; 40 CFR §262.11- Hazardous Waste Determination; 30 TAC §330.02 - Special Waste
House Keeping	Comment Section House Keeping:							
Equipment Washing	Has the facility manager determined where each bay drain, floor drain, and wash rack drains to?					BMP	Determine whether each drain discharges to surface water, a subsurface sump with leach field, or the sanitary sewer. The type of discharge determines the applicable regulations to be followed.	30 TAC §331.5 Underground Injection Control; 40 CFR §144, Subpart G, Texas Water Code
Equipment Washing	Are wash racks and floor drains connected to sanitary sewer?					BMP	Identify whether it is possible to connect to the sanitary sewer. Discharge to the sanitary sewer is the most effective method to assure compliance with applicable regulations.	Guidance Manual - Vehicle and Equipment Washing -Floor Drains/ Bay Drains/Wash Racks
Equipment Washing	Has untreated discharge to surface water ditches and storm drains been eliminated?					BMP	If discharge to the sanitary sewer is not an available option, wash equipment at an approved location off-site or consider washing equipment using the interim equipment washing standards outlined in TxDOT's March 2001 Compliance Agreement with TCEQ.	Guidance Manual - Vehicle and Equipment Washing - Guidelines for Washing; Texas Water Code Section 26.121 Unauthorized Discharge Prohibited
Equipment Washing	Are the wash rack grit traps regularly inspected and cleaned?					BMP	Each trap or sump should be cleaned out periodically. This can be done by facility personnel or contracted out to a qualified vendor. Grit trap waste is considered a Special Waste and requires a waste characterization.	30 TAC §335.62 – Hazardous Waste Determination; 40 CFR §262.11- Hazardous Waste Determination; 30 TAC §335.10 - Shipping and Reporting Procedures
Equipment Washing	Are interim washpads used in accordance with the March 2001 Compliance Agreement requirements.					BMP	Wash water leaving an interim wash pad must stay within the confines of the facility's boundaries. Also each time the interim wash pad is used the facility must keep a record of the date the wash pad is used and the number of vehicles washed.	TNRCC March 2001 Compliance Agreement
Equipment Washing	Comment Section Equipment Washing:							

Texas Department of Transportation
Facility Compliance Checklist for Maintenance Sections

SPCC	Has an SPCC plan been written and sealed by a registered engineer? (SPCC plan required if above ground oil storage capacity is 1320 gallons or greater under new rules)					RQD	A written SPCC plan is required at facilities which meet the requirements within six months of becoming operational. The Area Engineer who has responsibility over the facility should review the plan.	40 CFR §112.3 – General Requirements
SPCC	Does the written plan and site map accurately reflect the operations and physical layout at this facility?					RQD	The written plan is a primary component of the SPCC regulation. Review the site plan for accuracy and revise as needed when changes in facility layout or operations change.	40 CFR §112.7(e) – Guidelines for Plan Preparation and Implementation
SPCC	Have secondary containment structures been constructed at the facility as specified in the SPCC plan, including containment for mobile tanks (i.e. asphalt trucks & trailers containing product)?					RQD	Construct containment structures in accordance with the engineered drawings in the written plan. The facility should have the secondary containment structures in place.	40 CFR §112.7(e)(2) – Bulk Storage Tanks / Secondary Containment
SPCC	Are tank containment drain valves closed and locked.					RQD	Containment drain valves are to remain closed and locked when in non-operating status.	40 CFR §112.7(e)(9)(ii) - Security
SPCC	Are tank pump starter controls locked in the "Off" position when not in use or located in a site accessible to only to authorized personnel.					RQD	The starter control on all oil pumps must be locked in the "Off" position or located in a site accessible only to authorized personnel when the pumps are in the non-operating or stand-by status.	40 CFR §112.7(e)(9)(iii) - Security
SPCC	Does the facility conduct and document the monthly SPCC inspections as required?					RQD	Monthly inspections are required as per the facility's SPCC plan. Record the inspection using the one-page checklist in Appendix 3 of the plan.	40 CFR §112.7(e)(8) - Facility Inspections
SPCC	Comment Section SPCC:							
PST Management	Have all of the USTs at the facility been registered with the TCEQ? (Applicable to all petroleum USTs and any petroleum ASTs 1100 gallons or greater)					RQD	All USTs in existence on or after September 1, 1987 must be registered with the TCEQ. New tanks installed at a registered facility must be registered within 30 days after the completion of the installation.	30 TAC 334.7
PST Management	Does the facility have a copy of the current tank registration available for review?					RQD	Request a copy of the current TCEQ registration from the district PST coordinator each year. If necessary, request a copy of the registration from the TCEQ.	30 TAC §334.7 - Registration for UST's; 30 TAC §334.127 - Registration for AST's
PST Management	Is tank system equipped with a properly functioning Automatic Tank Gauge (ATG)?					RQD	ATGs are required when used with monthly reconciliation as a release detection method. Make repairs to the ATG if operating improperly.	30 TAC §334.50(d)(4) - Automatic Tank Gauging and Inventory Control
PST Management	Has the UST system been self-certified with the TCEQ?					RQD	A tank owner / operator is required to complete and submit a self-certification form annually to the TCEQ. The form must be completed with all the applicable information requested on the agency's authorized form for all regulated USTs at the specified facility. The annual submission of the self-certification form is should be 30 days prior to the due date specified in rule (30 TAC 334.8).	30 TAC §334.8(c)
PST Management	Is the Fuel Delivery Certificate displayed or available for inspection?					RQD	The current valid delivery certificate must be available to show the common carrier (prior to fuel delivery) or TCEQ staff. The certificate must be posted at the facility.	30 TAC §334.8(c)(5)(A)
PST Management	Are the tanks identified with a physical label / or number?					RQD	The tanks are to be identified with a legible tag, label, or marking which is permanently applied upon or affixed to either the top of the fill tube or to a non-removable point in the immediate area of the fill tube for each regulated UST at the facility. Label ID should match tank number on TCEQ tank registration.	30 TAC 334.8(c)(5)(C)

Texas Department of Transportation
Facility Compliance Checklist for Maintenance Sections

PST Management	Are monthly leak check reconciliation records complete for each underground tank?					RQD	Calculate the monthly math check and leak check numbers as part of the Release Detection requirements for each underground tank. Record monthly water level volumes for each tank. Maintain records for five years	30 TAC §334.50(d)(1) - Inventory Control
PST Management	Is the UST registration information filed with the TCEQ complete, accurate and up-to-date?					RQD	The owner or operator of a UST system must provide written notice to the TCEQ of any changes or additional information concerning such system. Such as, change of address; authorized representative; system status; type of stored regulated substance; installation of additional tanks or ancillary equipment; change or installation of corrosion protection, spill and overfill prevention equipment, or release detection; or change in location of records. The notice must be filed with the TCEQ within 30 days from the date of the occurrence of the change or addition or within 30 days from the date on which the owner or operator first became aware of the change or addition.	30 TAC §334.7(d)
PST Management	Is the district/facility maintaining appropriate records regarding the UST system and its operation?					RQD	Operation and maintenance records. Owners and operators shall maintain records relating to the operation and maintenance of a UST system (including records related to inspection, servicing, testing, and inventory control) as prescribed in this section for at least five years.	30 TAC 334.48(g) 30 TAC 334.10(b)
ST Management	Does the district/facility have documentation regarding the installation of the corrosion protections systems, system checks or inspections, or documentation from a corrosion specialist that corrosion protection is not required?					RQD	Operators are to maintain records to demonstrate compliance with the corrosion protection requirements, such as all appropriate installation records related to the corrosion protection system including the contact information for either the company which designed the factory-installed cathodic protection system or the corrosion specialist who designed the field-installed cathodic protection system, as applicable; drawings or plans depicting the locations of all cathodic protection system components, including the locations of all test stations; and operating instructions and warranty information, maintenance schedules, and testing procedures for all operational components of the cathodic protection systems. The following corrosion protection records shall be maintained for at least five years after the applicable test or inspection is conducted: results of all tests and inspections of any impressed current cathodic protection system conducted; results of all tests and inspections of the adequacy of any cathodic protection system; results of all tests and inspections to assure corrosion protection for electrically isolated components.	30 TAC §334.49 30 TAC §334.10(b)

Texas Department of Transportation
Facility Compliance Checklist for Maintenance Sections

PST Management	Does the district have documentation regarding the installation of leak detection equipment for the UST system and associated leak detection records? (Example- ATG monthly "Tank Test" printout records)					RQD	Owners and operators shall maintain records adequate to demonstrate compliance with the release detection requirements such as: All appropriate installation records related to the release detection system: All written performance claims pertaining to any release detection system used, and documentation of the manner in which such claims have been justified by manufacturer. Records of the results of all manual and/or automatic methods of sampling, testing, or monitoring for releases (including tank tightness tests) shall be maintained for at least five years after the sampling, testing, or monitoring is conducted. Records and calculations related to inventory control reconciliation shall be maintained for at least five years from the date of reconciliation. Written documentation of all service, calibration, maintenance, and repair of release detection equipment permanently located on-site shall be maintained for at least five years. Any schedules of required calibration and maintenance provided by the release detection equipment manufacturer shall be retained for as long as the release detection system is used.	30 TAC §334.50 30 TAC §334.10(b)
PST Management	Does the district/facility have documentation regarding the installation of tight-fill fittings, spill containment equipment and overfill prevention equipment of the UST system?					RQD	Spill and overfill control records. Owners and operators shall maintain records adequate to demonstrate compliance with the spill and overfill prevention and control requirements such as: All appropriate installation records related to the installation of any spill and overfill prevention equipment shall be maintained for as long as the spill and overfill prevention equipment is used. Records of any servicing, calibration, maintenance, and repair of any spill and overfill prevention equipment shall be maintained for at least five years after such work is completed.	30 TAC §334.51 30 TAC §334.10(b)
ST Management	Comment Section PST Management:							
General Comments	General Comments:							

*Notes
NI- Not Inspected
NA- Not Applicable
BMP- Recommend Best Management Practice (Not a Required Action)
RQD- Required Action