



Tank Assessment Report

Frequently Asked Questions

1. What are the major components in a tank assessment report for DTSC-permitted facilities?

Tank assessment report requirements for DTSC-permitted facilities (Resource Conservation and Recovery Act (RCRA), California-only (state-only), and standardized permits) are based on whether the tank system is new or existing. “Existing tank system” and “new tank system” are defined in California Code of Regulations, title 22, section 66260.10 (Cal. Code Regs., tit. 22, § 66260.10) based on the date of installation and waste type:

- For existing tanks, the tank assessment reports must address the requirements described in Cal. Code Regs., tit. 22, § 66264.191(a) and (c).
- For new tanks, the tank assessment reports shall satisfy the requirements described in Cal. Code Regs., tit. 22, § 66264.192(a) and (b).

For details on how to determine whether the tank is new or existing, please see Section 2.2 from the *Guidance for Preparing Tank Assessment Reports (Tank Guidance)*. Additionally, Table 1 and 2 from the *Tank Guidance* provides a list of the major components and a recommended organization for tank assessment reports.

2. What if I do not know the year my tank was installed?

If no information is available to help determine the tank’s age, it is recommended to apply the new tank requirements described in Cal. Code Regs., tit. 22, § 66264.192 as the conservative approach. The tank assessment report should also state that this approach was taken.

3. Do I have to do a tank assessment report on a miscellaneous unit?

Not always. Certain tank assessment report requirements may apply to miscellaneous units to ensure protection of human health and the environment. Please work with your DTSC Permitting Project Manager to determine the applicable requirements and see Section 2.1 of the *Tank Guidance* for further guidance.

4. What are common deficiencies found in tank assessment reports?

Tank assessment reports submitted to DTSC often are missing the following components:

- Certification and attestation statements (*Tank Guidance* Section 3.13)
- Corrosion protection information (*Tank Guidance* Section 3.12)

- Design standards for ancillary equipment (*Tank Guidance* Section 3.3)
- Foundation evaluation (*Tank Guidance* Section 3.7)
- Minimum shell thickness value (*Tank Guidance* Section 3.6)
- Seams, pressure controls and connection information (*Tank Guidance* Section 3.9)
- Seismic evaluation (*Tank Guidance* Section 3.5.2)
- Waste characteristics and compatibility with the tank (*Tank Guidance* Section 3.11)

5. How frequently do the tank assessment reports need to be updated?

Tank assessment reports must be submitted with every permit application, including permit renewals. However, they may be required sooner depending on the facility's permit conditions and/or the certifying engineer's recommendation(s). For further guidance on frequency, see Section 5 of the *Tank Guidance*.

6. Are there differences in tank assessment report requirements between standardized, California-only (state-only), or RCRA permitted tanks?

The tank assessment report requirements for standardized, state-only, and RCRA permitted tanks are the same.

7. What is the difference between the certification and attestation statements?

The certification statement is a required statement by any person signing a document as part of the permit application, under penalty of perjury, pursuant to Cal. Code Regs., tit. 22, § 66270.11(d). The attestation statement is a separate statement made by the certifying engineer attesting to the structural integrity and acceptability of the tank system for the transferring, storing and treating of hazardous waste and that the tanks and containment system are suitably designed to fulfill the requirements of Cal. Code Regs., tit. 22 Article 10 Tank Systems. Tank assessments submitted to DTSC must include both statements. For further guidance on these statements, see Section 3.13 of the *Tank Guidance*.

8. Where should the reports referenced in tank assessment reports be included?

Any reports referenced in tank assessment reports should always be enclosed in the tank assessment report(s).