

40 CFR 60 Kc Checklist

Determine Applicability



- Is your tank \geq 20k gallons?
- Was your tank constructed, reconstructed, or modified after 10/4/23?
- Is your liquid a VOL with a TVP \geq 0.25psia?



Emissions Control Systems



- Install Approved Seal Systems:
 - **Liquid Mounted Primary Seal**
 - Mechanical Shoe Seal
 - Secondary Rim-Mounted Seal (if applicable)
- Verify Floating Roof Integrity
 - No gaps between the roof and liquid
 - Ensure the seal is compatible with stored product.
- Prohibit the use of Vapor-Mounted Seals



Monitor Emissions Efficiency



- Achieve (and maintain) 98% control efficiency
- Conduct Vapor Recovery System Tests (if applicable)
- Perform Regular Leak Checks
 - Inspect for visible emissions
 - Address any gasket failures, seal tears, or loose fittings immediately.



Recordkeeping & Reporting



- Maintain Records
 - Tank specs (size, material, seals, etc.)
 - Dates of installation, reconstruction, or modification
 - Maintenance and inspection reports
- Submit Reports to the **EPA**
 - Provide initial compliance certifications
 - Submit ongoing reports as required, including emissions monitoring data.



Installation & Maintenance



- Use Certified Components: Ensure all installed systems (e.g. floating roofs, seals) comply with EPA standards
- Follow Installation Guidelines
- Schedule Routine Maintenance:
 - Inspect seals, fittings, and roofs periodically
 - Replace worn or damaged components promptly



Meet Compliance Deadlines



- Confirm Compliance Deadlines
- Document Upgrades & Inspections



Safety & Training



- Train Staff: Educate employees on new operational procedures, inspection protocols, and reporting requirements
- Use Proper PPE: Ensure safety during inspections and repairs, particularly for tanks in-service.



Prepare for EPA Inspections



- Keep Records Accessible: Organize documentation for quick access during audits.
- Conduct Internal Audits: Periodically review compliance status to identify and address gaps.



Stay Updated



- Monitor Regulatory Changes
- Consult Experts: Work with environmental consultants or product specialists like **Mesa ETP** to design custom engineered tank products to ensure compliance.
- Use Innovative Solutions: Implement advanced technologies like **FlexCore™** and **ClipLock™** for streamlined compliance.



By regularly revisiting this checklist and documenting each step, tank owners and operators can stay ahead of 40 CFR 60 Kc requirements, minimize environmental impact, and avoid costly fines.

