

# NATA ENVIRONMENTAL COMPLIANCE CHECKLIST

NATA developed this Environmental Compliance Checklist to assist members in achieving proper compliance with environmental rules and regulations. This checklist was developed based on the Federal EPA regulations and many states have additional requirements, so each facility should check their own state regulations. The checklist is intended to assist facilities with compliance with the most common environmental rules affecting aviation facilities and is not intended to be an extensive review of all environmental regulations.

The checklist is divided into four parts, Storm Water, Spill Prevention Control and Countermeasures (SPCC), Waste Issues, and Underground Storage Tanks (USTs). Specific compliance items are identified under each heading.

To use this checklist, simply review each item and first determine if that item applies to your facility. If the item is not applicable, note **NA** in the comments section. If the section does apply to your facility, you should circle the **Yes** if you properly comply with that item. If you do not comply, circle the **No** and develop a program to bring your facility into proper compliance. Contact George Gamble at ([gsgamble@2GEnvironmental.com](mailto:gsgamble@2GEnvironmental.com)) if you need additional assistance.

<b>STORM WATER</b>		
Do you or the airport authority have a storm water permit?	Yes No	
Do you have a copy of the Storm Water Pollution Prevention Plan (SWPPP)?	Yes No	
Do you have documentation on annual training for all personnel who can impact storm water?	Yes No	
Does the SWPPP require routine inspections and do you have documentation of inspections?	Yes No	
Does the SWPPP require reporting of glycol and/or urea use and do you have documentation of past reports?	Yes No	
Are all materials stored either indoors or under cover to protect contact with rainfall?	Yes No	

SPCC	Yes/No	Comments
If you have over 1,320 gallons in aboveground tanks and/or refueler trucks (anything greater than 55 gallons – USTs generally are exempt), then you must have a Spill Prevention, Control, and Countermeasures (SPCC) Plan. Do you have a written plan?	Yes No	
If you have over 10,000 gallons in aboveground tanks, you must have your SPCC Plan certified by a professional engineer. Is your plan certified?	Yes No	
Do you have documentation on annual training for all personnel who handle fuel or oil? Do all personnel know the proper reporting procedures?	Yes No	
Do you have documentation of regular (typically monthly) inspections?	Yes No	
Do all tanks and drums (55 gallons or greater) have secondary containment?	Yes No	
Does each tank have adequate loading/unloading area and is it properly discussed in the SPCC Plan?	Yes No	
Does each tank have a means to measure level and are procedures in place to prevent overfilling the tank?	Yes No	
Do you have documentation of each draining of water from containment dikes?	Yes No	
Do you have adequate spill kits?	Yes No	

<b>WASTE ISSUES</b>		
Does the facility generate any EPA Hazardous Waste?	Yes No	
Does the facility have an EPA waste ID number?	Yes No	
Are all wastes properly labeled?	Yes No	
Are all hazardous wastes transported and disposed of by a licensed waste hauler and disposal company?	Yes No	
Is documentation filed on all hazardous waste shipments (manifests)?	Yes No	
Does the facility generate any Universal Waste (used batteries, fluorescent bulbs, mercury containing equipment)?	Yes No	
Is used battery storage area labeled as "Used Batteries"?	Yes No	
Does each battery have a tag showing the date it was taken out of service (batteries can be stored for no longer than 1 year)?	Yes No	
Are batteries properly recycled?	Yes/No	
Do you ensure local personnel do not transport used batteries?	Yes No	
Do you recycle used fluorescent bulbs?	Yes/No	
Are used fluorescent bulbs properly labeled as "Used Fluorescent Bulbs"?	Yes No	
Do you ensure local personnel do not transport used fluorescent bulbs?	Yes No	
Does the facility store Used Oil?	Yes No	
Is Used Oil container properly labeled as "Used Oil"?	Yes No	
Is Used Oil properly recycled?	Yes/No	
If Used Oil container is 55 gallons or greater, is it included in the SPCC Plan and does it have proper secondary containment?	Yes No	
Is waste fuel properly labeled?	Yes/No	
Is waste fuel recycled and/or sold as a fuel product instead of as a waste?	Yes No	
Are employees trained to place only waste fuel in waste fuel containers? Are employees trained not to place solvents in waste fuel containers?	Yes No	

<b>UNDERGROUND STORAGE TANKS</b>		
Are all underground storage tanks (USTs) registered to the state UST group?	Yes No	
Do you have training documentation for Class A, B, and C operators?	Yes No	
Do you keep leak detection records for all tank inventory and/or tank tightness testing?	Yes No	
Do you keep leak detection records for piping?	Yes No	
Do you keep 60-day readings of cathodic protection system?	Yes No	
Do you have 3-year inspection documentation from cathodic protection expert?	Yes No	
If you have pumped transfers into your tank, do you have a visual and/or audible alarm system to protect for overflows?	Yes No	
If you have gravity transfers into your tank, do you have ball float valves or automatic shut-off devices on your tank?	Yes No	
Are spill buckets or other means of spill protection provided for your tank system?	Yes No	
Are spill buckets clean and free of fuel?	Yes No	