

## Explosive and Flammable Operations

### Checklist for Responsible Entity

General requirements	Legislation	Regulation
Establish safety standards that can be used a basis for calculating acceptable separation distances for assisted projects.	Sec. 2 Housing and Urban Development Act of 1969 (42 U.S.C. 1441 (a))	24 CFR 51 Subpart C

**1. Does the proposed project involve any of the following residential activities: development, construction, rehabilitation, modernization or conversion?**

*For modernization and rehabilitation, does the work increase residential densities, convert a building for habitation or make a vacant building habitable?*

No: STOP here. The project is not subject to 254 CFR Part 51 C. Record the determination in your ERR "Project will not increase the number of people exposed to potential hazards."

Yes: PROCEED to #2

**2. Are there aboveground storage tanks within 1 mile of the project site more than 100 gallons in size? Are there plans to install such aboveground storage tanks within 1 mile of the project site?**

(HUD's stated position is that 24 CFR Part 51 C does not apply to storage tanks ancillary to the operation of the assisted 1-4 family residence, for example the home heating or power source. It does apply to all other tanks, including tanks for neighboring 1-4 family residences.)

**\*A site visit is required to assess the area for hazards and must be documented.**

The site visit should be completed by the County Emergency Services management or local Fire Chief. The site visit is required to ensure that there are no storage tanks within one mile of the project site. A letter/memo from the individual completing the site visit should be placed as documentation in your ERR.

TIP: You do not have to consider all tanks at all sizes within 1 mile of your project. Screen further by determining the Acceptable Separation Distance for specific tank sizes and using that information to narrow your search. For instance, the maximum ASD for a 100 gallon tank is 115 feet. You do not need to map 100 gallon tanks farther than 115 feet from your project site.  
<https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities/>  
<http://www.hud.gov/offices/cpd/environment/asduserguide.pdf>

No: STOP here. The project is not subject to 24 CFR Part 51 C. Documentation to be placed in the ERR is this A-27 and a copy of the site visit signed by the County EMS management or local Fire Chief.

Yes: PROCEED to #3

**3. Is the Separation Distance from the project acceptable based on standards in 24 CFR 51 C?**

Use the online tool to calculate ASD:

<https://www.hudexchange.info/environmental-review/asd-calculator/>

Yes: STOP here. Include site visit report, maps and separation distance calculations in your ERR.

No: PROCEED to #4

**4. With mitigation, can the Separation Distance become acceptable?**

No: PROJECT IS NOT ACCEPTABLE-DO NOT FUND

Yes: STOP here. Maintain documentation supporting your determination in your ERR. Documentation could include a finding by a qualified data source (i.e. Fire Marshal, etc.), copies of pictures, maps, technical calculations and information describing the mitigation measures taken.

**MITIGATION OPTIONS**

If the Acceptable Separation Distance (ASD) cannot be met your options are:

No action

- Cancel the project at this location

Mitigation

- Contact your Field or Regional Environmental Officer  
<http://www.hud.gov/offices/cpd/environment/contact/>.
- Incorporate natural or existing man-made barriers.
- Have the storage containers (tank) buried • Reconfigure the site plan - To increase the distance between the hazard and the project.
- Modify the building design - To compensate for the ASD
- Construct a Barrier for blast overpressure and thermal radiation.

Other reasonable alternatives

- Choose an alternate site

**DISCLAIMER:** This document is intended as a tool to help TN CDBG grantees complete environmental requirements. This document is subject to change. This is not a policy statement, and the appropriate legislation and regulations take precedence over any information found in this document.

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Preparer signature and Title

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Date