
TASTP/TCEQ Q & A

MARCH 11, 2014

1. Is vapor monitoring a TCEQ approved method of tank release detection on a waste oil UST that is not using a Related Tracer Substance? What is a Related Tracer Substance? I did not see it in the Definitions. Does the owner have to comply with a variance and alternative procedure on how they are going to use the Related Tracer Method for vapor monitoring?

1A. Vapor monitoring with a volatile tracer is okay. One could introduce gasoline into the waste oil tank and monitor for the gasoline. Another method is using an ATG without inventory control, but a variance would be needed for the used oil tank.

2. UST contractors are required to be licensed A or B or both. Operators are required to have A/B/C training. Both of these require hours of training and testing to verify that the person understands the information. Is there a reason that the UTA inspectors do not have to at least take and pass the A/B operator training / testing and meet the same requirements as the people they are inspecting?

2A. State investigators are not required to take the same training.

3. The UTA inspections that we have observed it seems like the only CP information they are requesting is to verify if the piping is FRP and the UST is either FRP or ACT 100. What about the CP test requirements for STP and buried flex connectors on pressurized and suction product piping at sites that do not have containment sumps?

3A. Any component that retains regulated substances and in contact with water has to be protected from corrosion.

4. Any new information from the EPA on the stage II SIP.

4A. The EPA has approved the TCEQ SIP. The TCEQ is awaiting the EPA to publish in The Federal Registry. We will have to wait 30 days after the Federal Registry publication before de-commissioning can begin. The TCEQ has developed a notification form.

5. Any information on the requirements for removing stage II equipment and who will be able to remove the equipment.

5A. There has to be an on-site A supervisor or A/B supervisor. They will be responsible for signing the check list form which is being developed by the TCEQ. One will have 180 days to complete the job after notification and only 30 days to complete the job after the job starts. Hanging hardware can stay but everything else needs to be removed. If the owner/operator decides not to de-commission, he has to maintain the stage II equipment until August 31, 2018 at which time everything will have to be removed. Record keeping will be required for 5 years.

6. Any developments on when Central Registry will resolve the problem with PARIS not being able to print the sites complete PST registration information. The only way to get the information now is have Martha Glasgow group print the information.

6A. The TCEQ has submitted a work order to address this problem. It may be 2015 before the issue is corrected. One will have to continue calling Martha Glasgow until then.