
TASTP/ TCEQ Q& A

AUGUST 2012

Q. 1) Does TCEQ accept or reciprocate the experience of other states license for Installer A & B? Is the 40 hour course required for applicants that have been licensed in other states? Is the only requirement for other states applicants to take the test and pay the fees?

A. 1) Louisiana, California, and Oklahoma have reciprocity. You may contact Wanda Kurio of the TCEQ for more information.

Q. 2) How many training providers have been approved by the TCEQ? What is the status of those programs?

A. 2) There are currently two providers and as of August 3, 2012 they have trained approximately 6600 people.

Q. 3) I just met with a client who had an inspector visit who is contracted by the EPA. This inspector said some things about the CP test requirements that I was not aware of. The inspector said if a composite tank is in the ground for ten years or more, then a CP test is required every three years after that to “prove” that the tank’s coating had not been compromised in any way and the tank was still protected from corrosion. True?

A. 3a) Not True.

The inspector said a CP test needed to be performed after any construction activity on or around the tank, and the inspector gave an example of changing out a spill bucket. The inspector said that after a spill bucket was changed out, that a new CP test should be run to guarantee that the corrosion protection of the tank had not been compromised in any way as a result of that maintenance item. True?

A. 3b) There is no rule.

Q. 4) I have several pending projects that will not come on line till after the 1st of the year. We have not started any of these projects and our customers want to know if they have to install the required stage II equipment at a cost of around \$30K just to have to remove it within 12 months or when the rules change. I would suggest in this economy to waste money by installing items that will be obsolete in the very near future would be an expense that could be avoided. Is there any kind of waiver for new projects that will come on line in 2013 for an exemption of those current rules? Our clients are in a wait to see mode given the current economy to see if

they have to spend that money, they are looking at the EPA relaxing their rules and want to know what the TCEQ is planning.

A. 4) The TCEQ is working on an executive order to hold future construction on Stage II. Watch for the announcement on the TCEQ webpage.

Q.5). Regarding rule 334.45(d)(1)(E)(iv)

The last two lines of this rule, is worded in a confusing manner (to me) – it says “Must be inspected for tightness annuallyand at least once every three years thereafter.” Should it be inspected once/yr or every three years?

Also, regarding the same rule, is there any specific method that needs to be used for the tightness testing that is mentioned? My client has been filling dispenser sumps and STP sumps with water (upon installation) and looking for external leaks at any penetrations. Is there some specific documentation required to verify this was done? Is there a specific length of time sump must hold water before they say it is OK? How should the testing be conducted at the next test time, be that one year or three years later?

A. 5) Testing is required every three years but inspection is required every year.

Q. 6) Any answers to Part 63 testing? When will TCEQ start looking for these results or require the testing? I have several pending projects that will not come on line till after the 1st of the year. We have not started any of these projects and our customers want to know if they have to install the required stage II equipment at a cost of around \$30K just to have to remove it within 12 months or when the rules change. I would suggest in this economy to waste money by installing items that will be obsolete in the very near future would be an expense that could be avoided. Is there any kind of waiver for new projects that will come on line in 2013 for an exemption of those current rules? Our clients are in a wait to see mode given the current economy to see if they have to spend that money, they are looking at the EPA relaxing their rules and want to know what the TCEQ is planning.

A. 6) TCEQ will not look at those test results. This is an EPA regulation.

Q. 7) A client asked me if their maintenance personnel need to have Operator C training?

A. 7) No they do not.