
TASTP/ TCEQ Q& A

APRIL 10, 2012

Q. 1) Has the TCEQ approved any new A/B trainers besides TPCA?

A. 1) No: but getting closer with API. The TPCA is the only one approved at this time.

Q. 2) Does any site that has a regulated UST have to have A/B/C operator training including private fleet fueling sites?

A. 2) Yes. The temporary out of service facilities have to have trained A/ operators also.

Q. 3) What are the most common violations that are being issued by the TCEQ where the site are being fined. Are all of the violations issued fines or can the site correct a violation before being fined?

A. 3) The most common violations includes release detection, corrosion protection and a lack of records. Release detection and corrosion protection are A violations and are referred directly to enforcement. The TCEQ is allowing a two week time frame to submit records.

Q. 4) Are there any updates on when the state may file a revised SIP for the removal of Stage II vapor recovery?

A. 4) No. It will be two to three years before anything happens. Watch the TCEQ website for updates.

Q. 5) I have a follow up question in response to the following previous answered question #6 from the TCEQ/TASTP 8/9/2011 meeting.

Could the following site with gravity flow piping use the exemption for suction leak detection (334.50 (b)(2)(B)(ii)) using single wall FRP pipe if the complete line has to be replaced? There could be issues with connecting double wall pipe to a containment manhole and not having any of the piping single wall. You will also need to maintain a connection at the containment manhole that is going to be able to pass annular space testing. The remote fill line would operate at less than atmospheric pressure, the piping would be sloped, and there would not be any check valves. The site with this exemption would then be able to install a 3" or 4" single wall FRP pipe for the remote gravity fill pipe.

If this is not acceptable then can the complete remote fill line be replaced with single wall FRP pipe and use the testing method in (334.50 (b)(2)(B)(i)(I)) every three years?

(August 9, 2011 TCEQ/TASTP Meeting Questions (6)) Waste Oil UST piping questions: We have a location that has an existing waste oil UST with a remote fill pipe going into the building. They want to remove the existing waste oil UST and replace it with a new UST. If they leave the existing single wall remote fill pipe inside the building and connect to the new piping on the outside of the building, do they have to comply with the 35% piping regulation on a waste oil UST? Would it change any requirement if they also replace the containment manhole on the existing remote fill pipe inside the building? Does the remote fill line have to be double wall piping if the complete pipe is replaced?

A. 6) This fill pipe is regulated. If replace with same pipe and less than 35%, then good to go. If more than 35%, then you get into double wall piping.

A. 5) The exemption only applies to a suction line. Since the exemption does not apply to gravity lines, it has to be doubled-wall. The TCEQ would like to have more information regarding this question.

Q. 6) A system was installed after 1-1-09 with double walled pipe, turbine enclosures with sensors below the entry fittings level and dispenser sumps with sensors below the entry fittings level. The system is using automatic pressurized line leak detection (PLLD) .02 gph as the line leak detection. My question is: Do the turbine enclosures and dispenser sumps have to be water tested every three years?

A. 6) Yes they do. You test at installation and every three years thereafter.