



Texas Association of Storage Tank Professionals

TASTP/TCEQ Q & A

April 12 , 2011

Q. 1) When did the TCEQ (UTA) start site inspections to comply with the Federal Energy Act of 2005?

A. 1) The site inspections began in June of 2010. They are limited inspections and focuses on approximately 7 issues.

Q. 2) A member requested additional discussion regarding leak detection requirements in used oil tanks.

A. 2) The TCEQ stated that manual tank gauging was acceptable in tanks of less than 1,000 gallons. Groundwater monitoring is acceptable if groundwater is less than 20 feet deep. ATG can be used, but it is difficult because one has to meter in and meter out. Will have to ask TCEQ for a variance if one plans to use ATG. The other option is to place the waste oil tank above ground.

Q. 3) Is it required to test all containment sumps every 3 years?

A. 3) No.

Q. 4) How long do you have to replace a defective sump?

A. 4) Document it and fix it as soon as possible.

Q. 5) Are electronic line leak detectors required to be recertified each year?

A. 5) They do not have to be recertified, but they do have to be functionality tested on an annual basis.

Q. 6) Are pressure lines with electronic leak detection required to be precision tested each year?

A. 6) No.

Q. 7) Discuss the new Operator rules regarding A B & C certification and who can provide certification?

A. 7) This discussion will take place at the June 14, 2010 TASTP/TCEQ meeting.

Q. 8) Are any changes expected from the Legislature or Agency this year.

A. 8) Budget cuts are expected in this session.

Q. 9) Is it true that UTA inspectors are looking at cathodic protection testing results for tanks only?

A. 9) The TCEQ stated that the UTA inspections were limited in scope.

Q. 10) What was the purpose of the UST facility owner designating as its Class B operator a third party that would have to be a UST On-Site Supervisor (A or/ A/B license) and either is or employed by registered UST Contractor.

A. 10) The TCEQ wanted the B operator to be someone who is knowledgeable.

Q. 11) Would like TCEQ to go over Subchapter N: Operator Training. Has on-line training been setup and if so with what organizations.

A. 11) This discussion will take place at the June 14, 2010 TASTP/TCEQ meeting.