

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To: PST Reimbursement Section- Standard Operating Procedures File **Date:** January 21, 2004

From: Frederick Meyers, Manager, PST Reimbursement Section

Subject: Evaluation of Granulated Activated Carbon Trailer Waste Treatment/Disposal

Objective: To establish a uniform evaluation for reimbursing the costs associated with mobile granulated carbon (GAC) trailers that perform on site treatment and disposal of wastewater generated during corrective action activities conducted at leaking petroleum storage tank (LPST) sites.

Background: The Reimbursable Cost Guidelines (RCGs) specify maximum allowable rates for disposing of petroleum contaminated wastewater generated during corrective action activities performed at LPST sites. Currently, typical wastewater disposal at LPST sites is approved by costing out the activity through collection and transport by means of a vacuum truck. A cheaper means of disposal can be carried out on site by utilizing trailers where, on site wastewater is passed through drums filled with granulated activated carbon and discharged either directly into a storm water or wastewater conveyance system. The use of GAC trailers has become more prevalent as contractors find more cost effective methods for disposal of wastewater generated at LPST sites. The Reimbursable Cost Guidelines (RCGs) latest revisions, adopted on October 22, 1997 did not include cost line items addressing wastewater disposal via the GAC trailer. This document provides the guidance on reimbursing GAC related costs.

Based upon research by the Petroleum Storage Tank Reimbursement (PSTR) Section, it was determined that the allowable hourly vacuum truck rates are not applicable to this waste disposal technology. Costs associated with the GAC trailer are lower than those attributed to a vacuum truck. The reimbursable guideline rates are based upon four cost components for a GAC trailer. These are:

- amortization of capital expenditures for construction of and outfitting the GAC trailer
- mobilization and demobilization costs
- basic trailer maintenance
- and periodic replacement of the GAC drums.

REIMBURSEMENT POLICY:

For GAC trailer charges to be considered, at least one barrel (approximately 50 gallons) or more of wastewater must be treated. Further justification must be given for quantities less than 50 gallons. Such justifications include; less than 50 gallons of wastewater was generated for the complete activity or an allowance was permitted by the agency.

CASE 1: Wastewater disposal costs have been approved for utilizing a vacuum truck, but a GAC trailer was used and reimbursement of costs associated with the use of the GAC trailer are requested.

- A. Only GAC trailer costs are requested. Quantity of waste treated is not provided.

New Claim Action: Hold all requested waste disposal costs and request the quantity of waste treated. Use held code 999 and make note “Quantity waste treated/disposed.”

Protest with Documentation: Reimburse waste disposal at \$0.40/gallon, and \$75 for each trip. Disallow the excess using disallowed code 999 and make note “GAC Trailer Standard Operating Procedure (SOP). Reference the GAC SOP to the Fund Payment Report (FPR).

- B. Waste costs are requested at \$0.40/gallon and GAC trailer costs are also requested.

Action: Reimburse waste disposal at \$0.40/gallon and \$75 for each trip. Disallow the excess using disallowed code 999 and make note “GAC Trailer SOP.” Reference GAC SOP on FPR.

CASE 2: GAC trailer is proposed and approved utilizing Subchapter H discharged rates (\$0.40/gallon). Additional costs for the trailer are not proposed and/or approved.

- A. Only \$0.40/gallon is requested.

Action: Reimburse waste disposal at \$0.40/gallon. Reference GAC SOP on FPR.

- B. Waste costs are requested at \$0.40/gallon and GAC trailer costs are also requested.

Action: Reimburse waste disposal at \$0.40/gallon, plus \$75 for each trip. note “GAC Trailer SOP.” Reference GAC SOP on FPR

CASE 3: GAC trailer is proposed and approved, utilizing Subchapter H discharged rates (\$0.40/gallon) and additional trailer costs.

- A. Waste costs are requested at \$0.40/gallon and GAC trailer costs are also requested.

Action: Reimburse waste disposal at \$0.40/gallon, plus \$75 for each trip. Reference GAC SOP on FPR.

EFFECTIVE DATE OF IMPLEMENTATION:

This Standard Operating Procedure (SOP) will be effective for all active protests, claims, and currently pre-approved O&M work at the date of this SOP.

