

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
REMEDATION DIVISION  
PETROLEUM STORAGE TANK  
REIMBURSEMENT PROGRAM**

**QUESTIONS CONCERNING  
PREAPPROVAL AND REIMBURSEMENT USING  
THE QPRO SPREADSHEETS**  
revised: December 1, 2008

**General Information:**

This document is provided for further clarification and guidance on how the Reimbursable Guidelines will be applied in specific situations. This guidance is periodically updated and revised and can be found on the TCEQ's Petroleum Storage Tank Reimbursement Web site located at <http://www.tceq.state.tx.us/permitting/review/reimbursement/index.html>. Further questions concerning the contents of this document can be directed to the Petroleum Storage Tank Reimbursement and Technical Services Section at 512.239.2002.

**1. Bidding.**

*Answer* Bidding is required: 1) for large capital items, 2) when total drilling footage is 150 linear feet or more, and 3) when any well is drilled more than 50 feet deep. Bids on equipment should include manufacturer, make and model number, with the equipment listed in each supplier's bid being comparable in performance and operational characteristics. Please ensure that the description of each item is sufficient to adequately describe the item. Warranties must be provided at this time. Also, the supplier should note whether new or used equipment is being utilized.

- The agency can reject any bid on technical grounds, or if the bid is not believed to be cost effective, or it can ask for further supporting details. For all equipment purchases, there must be a warranty provided.
- The agency may accept less than three bids for those situations where it is demonstrated to the satisfaction of the agency that three bids cannot be reasonably obtained (on a case-by-case basis). Large ticket capital equipment items (>\$1,000) require three bids.
- All subcontracted costs more than \$1,000 whether it is for plumbing, electrical or mechanical work, bids will be required.

**2. How is per diem calculated?**

*Answer* It is based upon a standard work day. The Reimbursable Cost Specifications (RCSs) (Appendix A, Part 4) states "Per diem (meals and lodging) will be paid for site activities requiring more than one day of field work and occurring at a site greater than 90 miles (one way) from the closest office of the RCAS."

**3. How are Mileage and Per Diem Costs Reimbursed When Several Sites are**

### **Visited on Consecutive Days?**

*Answer* When a consultant takes the “milk run” approach (i.e., performing activities at remote sites on consecutive days, where overnight stays are required) the following allowances will be granted.

- The consultant will bill only the mileage accrued from the last site visited and not from the office, unless the point of origination or arrival is the office.
- When billing mileage in such a manner, a daily truck vehicle rate (\$140) will be allowed.
- When billing mileage in such a manner, the full or partial per diem rate (\$90.00 per day) will be allowed. A hotel receipt must be submitted for full payment of the per diem rate. Partial per diem will be allowed, if only meals were billed and are reasonable.
- The consultant must keep records in the form of trip logs to verify that a “milk run” has occurred.
- When billed as described above, it is recognized that the “milk run” approach is cost effective to the Reimbursement Fund.

### **4. How is a markup applied?**

*Answer* Markup for personnel and travel is allowed as specifically addressed in the RCSs, in particular at Appendix A, Part 9. Generally, this is not allowed unless the work plan clearly states that the proposed work is subcontracted and lists the Registered Corrective Action Specialist (RCAS) or contractor and its office location.

*Answer* For those reimbursement claims where the assignee (prime contractor) assumes the lead as project manager and subcontracts all office and field work, a markup of 10% is allowed. The subcontractor invoices cannot be subdivided to selectively apply applicable markup rates used by the prime contractor, unless the prime contractor directly contracts or purchases that equipment or services.

### **5. How will be air fare pre approved?**

*Answer* Air fare is addressed on an individual “as needed” basis in the RCSs. If air fare is approved, then no mileage will be approved. Allow 2.0 hours of travel time if air fare is approved.

### **6. How does the spreadsheet determine the number of samples for shipping?**

*Answer* See Appendix A, Part 2, Note 46 of the RCSs. \$5.00 per sample container (sample set in the case of BTEX/VOC samples) is allowed. A minimum is granted of \$40 (equivalent to eight samples) per event. If there are more than eight samples, then the spreadsheet calculates the total number of samples times \$5.00. Counting of samples is as follows: For water or soil samples, one sample if BTEX/TPH are both analyzed; for PAH, one sample; for vapor samples in a tedlar bag and one sample for shipping purposes if BTEX/TPH are analyzed. Inputting costs not listed on the spreadsheet.

*Answer* Most calculations for pricing are built into the spreadsheets. If it is required to override the calculations, the additions must be performed in the “Details Section” of the spreadsheet since most of the values in the “Condensed Section” come from the “Details Section”. All costs must be in accordance with the RCSs.

## 6. **Reimbursable Milage.**

*Answer* A mileage rate will be reimbursed at the lower of either the applicable Internal Revenue Service rate per mile or the applicable Official Mileage Guide for the State of Texas rate per mile at the time the activity was perform, regardless of what was allowed at the time of pre approval.

- Approved mileage rates are as follows: Prior to 11/1996 –
- variable
- 11/96 – 10/21/97 - 31 cents/mile (Federal rate applied)
- 10/22/97 – 08/31/98 - 32 cents/mile (Federal rate applied)
- 09/01/98 – 08/31/99 - 33 cents/mile (Federal rate applied)
- 09/01/99 – 08/31/00 - 31 cents/mile (Federal rate applied)
- 09/01/00 – 08/31/01 - 33 cents/mile (Federal rate applied)
- 09/01/01 - 08/31/02 - 35 cents/mile (Federal rate applied)
- 09/01/02 – 08/31/03 - 37 cents/mile (Federal rate applied)
- 09/01/03 – 08/31/04 - 36 cents/mile (Federal rate applied)
- 09/01/04 – 11/17/04 - 37 cents/mile (Federal rate applied)
- 11/18/04 – 08/31/05 - 35 cents/mile (State rate applied)
- 09/01/05 – 09/30/05 - 41 cents/mile (State rate applied)
- 10/01/05 – 12/31/05 – 49 cents/mile (State rate applied)
- 01/01/06 – 08/31/06 - 45 cents/mile (State rate applied)
- 09/01/06 – 08/31/07 - 45 cents/mile (State rate applied)
- 09/01/07 – 06/30/08 - 49 cents/mile (State rate applied)
- 07/01/08 - 58.5 cents/mile (State rate applied)

## 7. **How are fuel surcharges reimbursed?**

*Answer* Fuel surcharges listed as a line item for subcontracted work are deemed reimbursable under the following conditions:

- Wastewater disposal: Payable, if the full invoiced amount for collection and disposal including the fuel surcharge cost does not exceed the pre approved amount for disposal.

- Drilling Activities: Costs are included in the mileage rate.

**8. How are taxes approved.**

*Answer* Taxes do not need to be preapproved. They will be reviewed for eligibility at the time of reimbursement.

**9. Is waste disposal subject to sales tax in Texas?**

*Answer* No. Sales tax on waste disposal in Texas should not be approved or reimbursed. Other states may levy a sales tax on waste disposal and in those cases, the tax would be reimbursable.

**10. What tasks are covered in the Off Site Access Cost?**

*Answer* \$320 per each property accessed is the allowable reimbursement rate. This cost covers administrative and management costs, the costs for all negotiations between the RP and the property owner, and costs associated with drawing up the access agreement.

- Costs not covered are site access costs (either recurring or a one-time fee) imposed by the landowner, attorney fees, or additional negotiation hours. Permits and fees levied by governmental entities are covered with an additional \$500.

**11. Allowable Costs for Obtaining a Permit from a Governmental Agency for Monitor Well or Utility Installations.**

*Answer* \$500 is allowed for obtaining a permit or approval from a governmental entity to install a monitor well, a remediation system and/or its appurtenances. The reimbursement is a flat rate and can be used wholly or partially for time to obtain the permit and pay any applicable fees. This is a one-time rate for each permit obtained. Periodic fees are not reimbursable. A copy of the permit or approval is required to receive reimbursement.

## **MOBILE DUAL-PHASE EXTRACTION**

**1. What comprises MDPE equipment rental cost?**

*Answer* See Activity 02, Part B, Section 2 (and referenced notes) of the RCSs for details.

- For the 8, 24, and 72-hour events, equipment rental charges are a flat rate per event without stipulating the type of equipment to be used. Cost includes mob/demob charges, the vapor extraction unit, a vapor destruction unit, power supply, a 500-gallon tank, and all necessary sensors, electrical, piping, manifolds, and other necessary hardware to perform a turn-key job.

- For the 7-day event: Equipment rental charges are a flat rate based upon a skid-mounted unit that includes mob/demob charges, the vapor extraction unit, a vapor destruction unit, an air stripper or carbon canisters for water treatment, power supply, a 500-gallon tank, and all necessary sensors, electrical, piping, manifolds, and other necessary hardware to perform a turn-key job. Waste disposal costs are allowed in instances where NAPL is recovered and must be disposed of. If a discharge permit is required, personnel and sampling charges to obtain the permit are allowed. The 7-day event also includes an allowance for security personnel (See RCS Activity 02, Part A, Section 5 and Note 10). 500 gallons of wastewater disposal will also be approved.

**2. How are fuel costs treated for an 8-hr, 24 hr, 72 hr, and 7-day MDPE events?**

*Answer* The fuel costs are included in the equipment rental.

*Answer* For 7-day MDPE events, there is an option for using larger equipment that would require electrical hookups or additional gas charges. The criteria as to whether to use a larger MDPE system would be dependent upon:

- if a receptor is impacted or immediately threatened by the PSH plume and it would still be cost effective to utilize MDPE versus a fix system.
- For the site to close, only removal of PSH is required and larger equipment would achieve this in a shorter time period. A cost-benefit analysis must be supplied with the proposal that would demonstrate that the larger equipment will accomplish site closure in a quicker time period.

**3. What comprises the labor costs for an MDPE Event?**

*Answer* See Activity 02 (and referenced notes), and see Appendix A, Part 1 (and referenced notes) of the RCSs for details. Currently in the spreadsheet for the 8-hour, 24-hour, 72-hour and 7-day events all labor costs are automatically calculated. If costs in the RCSs disagree with the spreadsheet, go with the RCSs.

- Costs are allocated for the consultant for report preparation and project management. The RCAS is given travel to the site only if MDPE has not been previously performed at the site.
- For the 7-day event, an allowance for security personnel to be present during evening hours is automatically calculated. A security fence can be approved in lieu of approving security personnel.

**4. What is the allowable markup for Contracted MDPE Personnel Costs?**

*Answer* The allowable markup on contracted labor costs for MDPE events is 15%.

**5. Costs for Preparing a PI-7 Exemption**

*Answer* One time allowable of \$195 per site. Only preparation of one PI-7 per site is allowed unless there is a significant change in technology change or discharge limits. No additional allowance is given if the consultant/responsible party changes the RCAS or MDPE vender. It is the responsibility of the new contractor to assure that the PI-7 permit remains in effect.

**6. Costs for MDPE report generation for multiple events?**

*Answer* A separate report may be generated for each separate event in accordance with the RCSs. The RCAS has the option of billing for the report charge, if they prepare the report. An additional \$80 is allowed per event to cover project management costs.

**7. What preapproved costs are used for MDPE events that are longer than one week?**

*Answer* Multiple 8-hr., 24-hr., 72-hr. and 7-day MDPE events are allowable in accordance with Activity 02 of the RCSs. With the exception of sites with complex conditions, MDPE events will only be approved for events of 14 or fewer days (See RCS Activity 02, Note 1).

**8. How are costs for well gauging approved between MDPE events?**

*Answer* An allowance is given for visiting the site and gauging wells for PSH between MDPE events. Answering “yes” to this question will approve it. It is expected that the RCAS should bundle this trip with other on-site or nearby events.

**9. How is waste management pre approved and reimbursed?**

*Answer* For the eight, 24, and 72-hour events an allowance of four hours for a vacuum truck and disposal of 500 gallons is automatically given. For the seven-day event, there is no allowance for offsite disposal of wastewater. This is factored into the rental cost.

*Answer* For the 7-day events, pre approval of wastewater disposal is not given unless special conditions dictate it (see next answer). If wastewater disposal is approved for a 7-day event, the reimbursable rental rate will be decreased. NAPL disposal is above the default waste disposal costs for a 7-day event and will be reimbursed based upon the number of the gallons shown on the waste manifest. No pre approval for NAPL disposal is required. It is assumed that generally no more than several hundreds of gallons of PSH would be generated per event. Costs for obtaining a discharge permit are in addition to the flat rates.

*Answer* 7-day events: There are situations where dewatering is required to increase the effectiveness of the MDPE event and because of the location, there are no realistic or cost effective avenues for discharge through storm water conveyance or via sanitary sewer systems. In those cases, costs associated with temporary onsite storage, hauling and disposal of wastewater will be allowable. However, preapproval of costs associated with managing and disposal of the extracted water must be preapproved prior to the event beginning. If additional wastewater disposal costs are approved, the amount pre-approved for equipment must be reduced by \$1,925.00.

**10. Costs for Preparation of Discharge Permit Applications**

*Answer* For preparation of applications to discharge into a sanitary sewer or waters of the State of Texas, allowed for reimbursement are two hours for a staff engineer to

prepare the report and permit fees. Costs for additional sampling are also allowable.

**11. How are costs for Security Personnel and Security fencing reimbursed.**

*Answer*

- Security Personnel: For the 72-hour and 7-day MDPE events, costs associated for providing security at the site during evening hours are reimbursable. A maximum of \$1,050.00 (35 hours at \$30.00/hour) for the 72-hour event and \$2,880.00 (96 hours at \$30.00/hour) for the 7-day event is allowed. The contractor may subcontract this activity out (minimum of two bids are required) or utilize their own personnel. If reimbursement of their own personnel used for security purposes is sought, time sheets must be provided in the reimbursement application to verify hours the employee was present on site. No additional travel costs will be allowed.
- Fencing: Security fencing may be utilized in lieu of security personnel. A cost of \$300 per event will be allowed for temporary fencing. If the site conditions are such that fencing costs would exceed this amount, two bids must be secured and submitted with the reimbursement application as well as the justification for the added costs.
- If the activity is to be performed within an already secured area, no security costs are to be reimbursed, unless it can be shown that the owner of the secured facility where the activity is to be performed requires it. Written documentation from the site owner will be required for reimbursement of these costs.

**12. What is difference between one-way mileage and car mileage in the input box?**

*Answer*

Equipment truck mileage applies to travel where a truck charge is incurred usually by a technician (\$140/day). This charge includes the first 100 miles. Car mileage applies when travel to a site does not require a truck with equipment (i.e., a site visit by an engineer for inspection or oversight purposes). There is no minimum mileage, but the maximum round trip mileage of 500 miles would apply.

**SITE ASSESSMENT**

**1. Preliminary Planning?**

*Answer*

The deadline for allowing new sites into the reimbursement program has past. It should always be zero at this stage of the game. If there is a case for a special project requiring a report, the RCSs provide for that (Appendix, Part 8, Report Generation - Miscellaneous).

**2. Variance for Reimbursement of Type II drilling rigs.**

*Answer* If the Type II drill rig has the ability to be self-propelled (i.e., tract driven) and have rotary auger drilling capabilities to perform split spoon sampling and install 4" diameter wells to 25 ft, then drilling costs will be reimbursed up to the RCS amount for a 25-foot well for the 1st three wells installed. After that, the 4th well is to be billed at the TYPE II Rig Rate being 65% of RCS rate.

**3. What if all three drilling bids are above the RCSs?**

*Answer* Apply the RCSs. Generally for bids, use the most technically feasible bid which is also reasonably priced. With respect to the Reimbursement Program, the agency is not required to accept the lowest bid. All bids can be rejected if they are considered technically inappropriate.

**4. Reimbursement of costs associated with HB3030 - required identifying Water Well locations.**

*Answer* Generally, sites in the PST Reimbursement program have already had groundwater impacts investigated by this time and will not be affected by HB3030. However, there will be cases where sites that have been closed because of soils only impacts are reopened because groundwater contamination has recently become a concern. In these instances, it may be possible that a HB 3030 case could be generated. Reimbursement for costs associated with HB3030 cases are allowed and will be relative to the density of urban development surrounding the facility. For pre approval purposes assume a Technician I will be required for three full days, apply a mileage rate only (per diem may be applicable) and a report preparation cost of \$480. The actual reimbursement will be determined at the time the application is reviewed and based upon the actual the level of documented effort.

**5. Reimbursement of Driller's Mileage:**

*Answer* For CARF's issued on or after November 18, 2004, the lump sum mobilization rate of \$300 is allowed that includes the first 50 miles of travel, one-way. Each additional mile more than 100 miles is reimbursed at \$1.25 per mile or \$2.50 per round-trip mile as listed in the RCS's. Many times drillers string several jobs together across the state. When this occurs, the lump sum mobilization cost is reimbursement for travel to the first site. Thereafter, only the mileage between the sites is reimbursed at \$1.25 per mile.

**6. Are analytical costs for determining the source of the product (fingerprint analysis) reimbursable?**

*Answer* Only in cases where eligibility of the plume becomes in question.

- Case I: If it is needed to determine if a property impacted by petroleum products and near to an LPST still within the Reimbursement Program could possibly have an eligible plume within its property boundaries.
- It is suspected that an eligible plume is or has been commingled with an ineligible plume.

## **PILOT TEST**

**1. Why is there the option of two data loggers and two air compressors?**

*Answer* This depends on need. This option is an artifact from the old spreadsheets. Pre approval can only be given for one type of data logger (2-channel or 8-channel) or air compressor (five horse power or 185 CFM). If different sizing is required, justification should be provided along with bids for the rental. This would be added onto the spreadsheet in the line “other”

**2. What is the procedure to approve a regenerative blower, liquid ring pump or SVE trailer?**

*Answer* Please note that these three components are used to apply a vacuum for solely SVE application, therefore approval for only one remediation system should be given when one is specified.

**3. For 24-hr testing, how many days do we approve for equipment rental?**

*Answer* Two days rental for small devices. If an MDPE unit is specified for conducting a pilot test, approve \$3100 for the MDPE unit rental.

**4. Does the cost for a holding tank include delivery and pickup?**

*Answer* No. The cost in the spreadsheet is for the rental charge only. Delivery and pick-up must be manually added on the “other” line. Bids can be requested for this item. If the RCAS owns the tanks and desires to use them at the site, the cost the RCAS’s charge for rental and hauling must be equal to or less than a rental charge at a source close to the facility (i.e., RCAS’s office is 150 miles away but local sources are available and the tank rental charge and delivery fee from the local source is less).

## **GROUNDWATER MONITORING**

**1. How is the cost for the annual report calculated?**

*Answer* \$580 for the annual report per event including project management time.

**2. Reimbursable costs for only gauging monitor wells or wells that are found to have PSH present.**

*Answer* If groundwater levels are required to be gauged in monitor wells, but the wells are not to be sampled, a reimbursable cost of \$20.00 per well will be allowed.

*Answer* If a well to be sampled has PSH present and the directive is to not sample wells having PSH present, the cost to measure the PSH thickness and groundwater depth is \$20.00 per well.

**3. Payment of Wastewater Transport and Disposal Costs**

*Answer* Any wastewater disposal hauler who has a operating licensed issued by the TCEQ to be able to handle petroleum contaminated water will be reimbursed. This includes waste oil haulers.

**4. If the purged water is to be treated by a water treatment unit such as a GAC trailer, do we approve drums to store the water on site during purging of monitor wells with additional money for the field technician to route the purged water to the water treatment unit?**

*Answer* Yes. It is reasonable to assume that a consultant would have several sites where groundwater monitoring is occurring and accumulate small amounts of water (50-100+ gallons) at each site. At some point in time, the consultant returns with a water treatment unit and treats and disposes the water at these sites. Approval can be given for drum storage and GAC trailer treatment or similar, in lieu of having a vacuum truck going to the site to pick up the water. Keep in mind that the agency will pay for drums only one time with the expectation that the RP is responsible for keeping the drums and their contents secure.

**5. Cases where drums are stolen or too damage for continued use.**

*Answer* A one time replacement cost per site is allowed.

**6. Policy for reimbursing costs of rope used for bailing wells.**

*Answer* Currently, bailing rope is covered under Small Items (Appendix, Part 5, Equipment Small, Miscellaneous). Up to 150 feet of bailing rope is covered under this line item. Additional footage can be pre approved and reimbursed at \$0.10 per foot or invoiced price, whichever is lower. Footage will be calculated as follows: (average depth to water (feet) at the site plus five) times the number of wells.

**7. Policy for reimbursing costs associated with disposal of sludge contained in drums.**

*Answer* Case I

- Sludge is a mixture of soil and water not contaminated with hydrocarbons. Costs associated with the collection and analysis of a sample, the transport of and disposal of the sludge at a property are allowable. Drums should preferably be recycled.

*Answer* Case II

- Sludge is a mixture of soil and water and is lightly contaminated with hydrocarbons. Costs associated with the collection and analysis of a sample, the transport of and disposal of the sludge and drum at a permitted municipal landfill are allowable.

*Answer* Case III

- Sludge is a mixture of soil and water and is highly contaminated with hydrocarbons. Collection of a sample and analysis, the transport of and disposal of the sludge and drum at a Class I landfill are allowable. Note that in this case,

it must be shown that PSH recovery from wells must have been occurring to verify the source of the high concentrations of hydrocarbons in the sludge.

## **CORRECTIVE ACTION PLAN PREPARATION**

**1. How much can be approved for the CAP preparation of a bioremediation system?**

*Answer* \$1,525 (for a CAP with no remediation system). Note that \$8,145 is allowed for preparing a CAP that includes plans and specifications for a remediation system.

**2. Can more money be added for personnel costs if the trench crosses the length of the property, the site is an active service station, and it would take several days to install?**

*Answer* The personnel costs are fixed. The system installation approval is calculated by the type of system and the number of the recovery wells. It is not divided out on a per day basis. The only exception may be related to piping crossing a road or impacts to utilities located in right-of-ways.

**3. Do personnel costs include startup?**

*Answer* Yes.

**4. What is the difference between the two-pump system and one-pump system?**

*Answer* A one pump system is defined as vapor extraction and groundwater extraction are conducted in the same well. A two-pump system is defined as vapor extraction is conducted from one set of wells and groundwater extraction is conducted from another separate set of wells. In the input box, if it is a two-pump system, then click on "Groundwater pump and treat and SVE". If it is a one-pump system, then click on "Dual Phase Extraction".

**5. What are the units for trenching, plumbing and resurfacing?**

*Answer* The footage for trenching and resurfacing should be derived from the RCSs and should be measured from the site map. Trench excavation is \$15.00 per linear foot, trench resurfacing is \$6.00 per linear foot and piping is \$15.00 per linear foot for a three-well setup or \$5.00 linear foot regardless of the number of lines installed in the trench. Note that all other costs (tools, backhoe, saw, contractor's mob/demob and per diem, etc.) are included.

**6. How are well head modifications approved?**

*Answer* See Activity 09, Part C of the RCSs. There are no RCS amounts. However, the driller should provide a set rate. Approve up to \$900 per new remediation system well head installation or the driller's bid, whichever is less. For modifications to an existing well head, allow two hours at a Tech II rate plus materials depending upon the complexity of the construction.

**7. System components have been stolen or vandalized or damage by an identified third party.**

*Answer* A one time replacement is allowed. The proposal should be accompanied with photographs of the damaged or destroyed components, a Police Report if one was filed, and measures that will be taken to prevent a recurrence. If an identified third party has damaged the system, the third party's insurance will be required to repair or replace the damaged or destroyed equipment.

**8. How are miscellaneous and small items approved?**

*Answer* A one-time allowance of \$100 per site for miscellaneous items. Small items are charged at \$20.00 per day multiplied by the number of on-site days for the Technician (includes start-up time)

**9. How is fencing priced?**

*Answer* Based upon submitted bids. Certain sites may have special requirements for fencing. Generally, a six-foot high wooden fence encompassing an 10 ft by 10 ft compound is standard.

**10. Does travel cost include startup?**

*Answer* See Appendix A, Part 4 of the RCSs. Additional mileage should be allowed for startup travel costs. Note that for the sites 250 miles away, collecting seven days of data may be too costly. Consider using telemetry to gather and collect data during the seven days, in conjunction with a couple of site visits. Generally, for the site located at a distance of 200 miles or more, the costs for seven round trips will be the same to the cost of having a technician remain at the site for seven days. For sites located greater than 150 miles from the office, approve three, round trip site visits. For sites located less than 150 miles approve seven site visits.

**11. Requirements for reimbursement when soil excavation is utilized as a remedial method.**

*Answer* Costs associated with soil excavation as a remedial alternative are reimbursable with the following considerations:

- Significantly shortens the time to bring the site to closure. Ideally, once the source is removed closure could be within one year of completion of the soil excavation.
- Significantly less expensive than installing and operating a fix system.
  - (1) If ongoing costs are to be incurred at the site after excavation is completed, those costs are to be factored into the analysis.
- Excavation as a remedial alternative would be considered acceptable at those sites where conditions exist that may cause limitations to the installation and operation of a system.
- Costs for reasonable dewatering operations are reimbursable.
- Reasonable costs for removal and re-installation of fixtures.
- If a new UST system is to be installed in the excavated area, normally some costs may not be reimbursable. Those could be:

- (1) Excavation and disposal of soil equal to the volume of the new USTs.
- (2) Any additional excavation outside of the area to be remediated that is required for the installation of the UST system. (Contact the Reimbursement Section for further questions (512-239-2002).

## **OPERATION, MONITORING AND PERFORMANCE (OMP)**

1. **Refer to OMP guidance dated May 23, 2008 for approval of additional site visits and application of the 7% change order rule to OMP activities.**
2. **Refer to OMP Guidance dated May 23, 2008 for determining the eligibility of fuel costs for vapor destruction units.**
3. **How are the number of the recovery wells determined?**

*Answer* A recovery well is counted as one well, regardless of whether single phase or dual phase recovery is being performed from that well.

4. **When is an additional system added?**

*Answer* When a significant increase of volumetric removal capacity is required for a dual-phase extraction system (a two-pump system that has two-pumps, one for the vapor phase removal and one for the liquid phase removal), add one additional system. This is not intended for those single pump systems using solely SVE, pump & treat, or dual-phase with one-pump (i.e., a stinger tube system).

5. **How is the approval of mechanical/electrical for routine system maintenance applied (Activity 10, Section 4)?**

*Answer* Allow no more than two visits. Section 4 is used for infrequent maintenance of a system where the system must be shut down. Typically it is for cleaning buildups caused by scaling/bio-fouling control, re-packing the air stripper, back-washing the carbon polishing unit, and break down of the pump or other components for cleaning. Please take into account that in addition to this infrequent visit, an allowance is already given for (a three-well system) weekly visits of \$163 of field work and maintenance, or about three hours per week. Weekly site visit activities would typically include documenting vacuum, airflow rate, pumping rate, oxidizer temperature, and the collecting of a vapor or water sample. Site reconnaissance and collecting of data should take approximately one hour of time leaving about two hours remaining for routine maintenance that would include cleaning, adjusting components, replacing filters, changing oil in the pumps, etc.

- Apply the following for a typical approval involving a one to two system maintenance events: **one event requires four hours of technician time** to coincide with the weekly visit. No additional travel is needed. An overnight stay may be approved in conjunction with this. There typically should be no approval of additional items for this type of cleaning maintenance, unless a change out of a specialty item is periodically required. No preapproval is required if the RCAS deviates from this. Given that it is difficult to pre approve these events, it will be

incumbent upon the RCAS to justify, at the time of reimbursement that all costs accrued to this activity were necessary. If this type of maintenance is required on a more frequent basis, then consideration should be given to re-engineer the system to prevent continued buildup or system down conditions. This is to be approved at the discretion of the TCEQ project manager and dependent upon the characteristics of the system and environment.

**6. How is the approval of Emergency Service applied (Activity 10, Section 5)?**

*Answer* This section is not applicable any more as 13 additional OMP site visits are now allowed as of April 1, 2008 to be used for emergency site visits.

**7. Why does the input box contain “proposal-continue OMP” and “proposal - other”?**

*Answer* The former is for preparing a proposal for additional OMPs. The latter are for preparing small modification(s) to the operating system under the OMP.

**8. Will costs be reimbursed for disposal of purged water generated from quarterly groundwater sampling and monitoring activities that occur during an O&M event?**

*Answer* No. The purged water should go through a water treatment unit to be discharged or re-injected at the site. The waste management is provided for NAPL disposal.

**9. If the purged water goes to the water treatment unit, are drum costs allowed to store the water on site during purging of monitor wells with additional money for the field technician to route the purged water to the water treatment unit?**

*Answer* No. Any collected waste water should be immediately placed into the treatment system.

**10. How is the 85% System Run Time Reimbursement Rule applied?**

*Answer* To be eligible for reimbursement of 100% of pre approved O&M costs, the system must have been running for 85% of the pre approved period. The 85% run time rule allows up to 55 days of down time during a 12-month period.

*Answer* The run time is calculated as follows:

- For a single-phase system groundwater recovery system, data presented in a table format showing daily or weekly run time hours or data in a table format showing daily or weekly volumes of ground water to equal the average designed groundwater recovery rates obtained from a cumulative flow meter.
- For a single-phase soil vapor extraction (SVE) unit, daily or weekly readings of run time, presented in a table format.
- For a dual-phase system, overall runtime is determined by the amount of time the SVE recovery unit is operating.
- Variance:

(1) If the SVE unit is not operating, but the groundwater extraction leg remains operating, the runtime will be calculated that would include the time the SVE leg is down while the groundwater extraction leg remains operating under the following conditions:

- (a) Plume containment is required to be maintained to protect a receptor (i.e., a water well) or significant offsite plume movement.
- (b) PSH recovery must continue
- (c) Length of time down (on the order of months down) would significantly increase startup costs.

- Refer to the May 23, 2008 “Remediation System Runtime Guidance” for allowable downtime for the system due to system failures.

**11. What backup documentation is required for quarterly reimbursement submittals for O&M fuel costs.**

*Answer* For submittals of quarterly costs, you must demonstrate that the system was operating >85% of that time during that period for full reimbursement.

- If it is a groundwater extraction system: present weekly flow rates.
- If it is a SVE system: demonstrate that PI-7 limits would have been exceeded if the vapor destruction module was not operating. This can be proven by mass calculation tables showing weekly PID or other vapor concentration readings and providing the monthly vapor analytical reports. Please be advised that we look at a minimum of three continuous months of operational data to determine if the PI-7 limits were exceeded and that corresponding fuel costs can be reimbursed.
- If it is a dual phase system, the SVE criteria listed above must be met.

**12. What are the routine field activities for the weekly O&M visits?**

*Answer* It is expected that minimum occur:

- Weekly data recorded to include all meter readings and any gauge readings.
- Collection of weekly air and water samples.
- Changing of filters.
- Inspection and re calibration of equipment, if required of all working equipment.
- Minor cleaning and lubrication of equipment.
- Minor repairs if less than ½ hr of time.
- Measuring of water levels in several wells.

**13. Are costs for completing and submitting the monthly Texas Pollutant Discharge Elimination System (TPDES) form reimbursable?**

*Answer* Yes. \$485.00 on a semi-annual basis is allowed. Proof of the reports submitted is required for reimbursement purposes. Reimbursement for the shipping and analysis of required parameters is allowable.

**14. Are costs for keeping utilities active reimbursable at sites where a system is not operating?**

*Answer* Yes. These costs are allowable whether the system is down for repairs or has been shut down because clean-up goals appeared to have been met and groundwater monitoring is in progress. The necessity of these costs must be re-evaluated every six months.

**15. Is the Cost to Lease the Land for Placement of a Remediation System Reimbursable?**

*Answer* Reimbursement of leasing costs are reimbursable under the following conditions:

- the leased property is not owned by the Responsible Party;
- pre-approval is obtained;
- it can be demonstrated that either
  - (1) placement on the Responsible Party's property is not practical because of lack of space or safety concerns,
  - (2) or the system is utilized to cleanup two or more LPST sites and the location selected is optimize because of engineering design considerations.

## **SITE CLOSURE**

**1. How are dismantling costs of remediation systems determined?**

*Answer* See Activity 11 of the RCSs. Remediation system removal costs allowed are as follows for an average, three recovery well system (ground water <50 feet deep):

- System demolition and removal are a flat rate of \$750 for a single phase system or \$1,500 for a dual phase system. This would generally cover uncoupling and demolition of the system, loading onto a trailer and hauling to a disposal or recycling facility. Reasonable disposal fees are included. For removal of remediation systems, the make, model and serial numbers of major equipment removed must be submitted with the reimbursement application. If the system is larger than that designed for a typical shallow aquifer system, the RCAS may obtain bids for removal. Bids will be itemized and are in lieu of using either the \$750 or \$1,500 rate. As a rule of thumb, if bids are used, it would be expected that only large multi-phase systems would exact a pricing of several times the \$1,500 rate.
- Add to system removal costs, the plugging of recovery wells at the appropriate rate per well, which would cover removal of all pumps and lines located in the wells, capping of lines in the trench, removal of the well box, and plugging and abandoning of the well. The cost for the RCAS to be on site is covered by the Field Personnel Costs (number of wells plugged times the appropriate rate). It is

expected that the technician would oversee the plugging of wells and oversee and assist in the demolition and removal of the remediation system.

## 2. **Who owns the remediation equipment once the site is closed?**

*Answer* Typically the RP assumes ownership of the remediation equipment once its intended function is no longer required for corrective action. However, the agency reserves the right to require remediation equipment to be reused or transferred to another site without consent from the RP. The costs for the transfer or refurbishing of this equipment are reimbursable.

*Answer* For sites transferring to State Lead, the remediation equipment comes under the control of the State until it is deemed that the equipment is no longer required for clean-up activities at that site or at another site. Once it is deemed that the equipment is no longer required, the RP assumes full ownership of the remediation equipment.

*Answer* If the RP does not want to assume ownership of the equipment, allowable costs for removing and disposal of the equipment are allowed.

## 3. **How is the plugging of wells priced (Activity 11, Part B)?**

*Answer* For sites with four or fewer monitor wells to be plugged with well depths 25 feet or less:

- Allow \$300 per well for plugging regardless of the methodology used to plug the well. For sites with five or more wells, if the well casings are drilled out or removed with a drilling rig, allow \$300 per well.

*Answer* For sites with five or more monitor wells to be plugged with well depths 25 feet or less:

- If other machinery rather than a drilling rig is used, \$150 per well is allowed for plugging five or more wells.

*Answer* For sites requiring closure of wells deeper than 25.

- If the total cost for a driller to plug and abandon the wells on site exceeds \$10,000 (regardless of the depth or number of wells) three bids from independent drillers will be required. The consultant should contact the TCEQ Project Manager if three bids cannot be obtained to determine the best practical approach.