



Fueling Systems
Environmental Services

SE&M^{INC}

STATION EQUIPMENT
& MAINTENANCE, INC.

P. O. Box 4319
302 Industrial Drive
Victoria, Texas 77903-4319
(512) 573-7449

10315 Leopard
Corpus Christi, Texas 78410
(512) 241-7002

January 31, 1991

Mr. John Crocker
Crocker Roofing
P.O. Box 1636
Victoria, Texas 77901

Re: Closure of UST at Crocker Roofing, 3505 Houston Hwy.,
Victoria, Texas

Dear Mr. Crocker:

On January 28, 1991, Station Equipment and Maintenance, Inc. filled the above referenced underground storage tank in place with an inert cement-sand slurry.

SE&M received prior approval after submitting a closure plan with sample results to the Texas Water Commission District 12 Field Office.

We have notified TWC that the work has been completed and they will eventually send you a letter stating that no further action is required.

I trust that everything was handled to your satisfaction.
Thank you.

Sincerely,

Dawn Wendt
Environmental Specialist

PETROLEUM EQUIPMENT AND ENVIRONMENTAL SERVICES FOR DISTRIBUTION AND MARKETING.
SALES, SERVICE, INSTALLATION, DESIGNS, CONSULTING
ENVIRONMENTAL SITE ASSESSMENT AND CONTAMINANT RECOVERY

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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

February 7, 1997

Mr. John Crocker, President
Crocker Roofing & Sheet Metal Company
P.O. Box 1636
Victoria, Texas 77902

Re: Underground Storage Tank (UST) System Permanent Removal From Service at
Crocker Roofing & Sheet Metal, 3505 Houston Highway, Victoria (Victoria County),
Texas
Facility ID: 19680

Dear Mr. Crocker:

This office has completed its review of the UST system permanent removal from service activities conducted on January 28, 1991 for the above referenced facility. Based on the information available, it appears that the UST system permanent removal from service activities meet the general requirements of Title 30, Texas Administrative Code (TAC) §334.55, the Texas Natural Resource Conservation Commission (TNRCC) rules for UST system permanent removal from service.

The TNRCC appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you have any questions, please contact Dave Reigel of my staff at 512/980-3121.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Russell Lewis".

C. Russell Lewis
Waste Program Manager
Corpus Christi

DR/dr

cc: Allen Martinets, Technical Services Section, PST Division
bc: Bud Spalding, Ron Brown Company, P.O. Box 2029, Victoria, Texas 77902

REPLY TO: REGION 14 • 6300 OCEAN DRIVE • CORPUS CHRISTI, TEXAS 78412 • AREA CODE 512/980-3100 • FAX 512/980-3101

§334.41-334.55

§334.55. Permanent Removal from Service.

(a) General provisions.

(1) Any owner or operator who intends to permanently remove an underground storage tank from service (by either removing the tank from the ground, abandoning the tank in-place, or conducting a

permanent change-in-service) shall provide prior notice of this activity to the executive director in accordance with §334.6 of this title (relating to Construction Notification).

- (2) The procedures used in permanently removing the underground storage tank from service shall conform with accepted industry practices, and shall be in accordance with a code or standard of practice developed by a nationally recognized association or independent testing laboratory.
- (3) The permanent removal from service shall be conducted by qualified personnel possessing the appropriate skills, experience, competence, and, if applicable, any required license or certification to complete the activity in accordance with the provisions of this section and in a manner designed to minimize the possibility of any threats to human health and safety or the environment.
- (4) All underground storage tanks that are intended for permanent removal from service shall be emptied of all regulated substances and accumulated sludges or residues, and shall be purged of all residual vapors in accordance with accepted industry procedures commonly employed for the stored regulated substance.
- (5) The handling, transportation, and disposal of any regulated substances removed from an underground storage tank system, and any contaminated soils, backfill material, groundwater, wash water, or other similar materials removed from the system or facility, shall be conducted in a safe and environmentally sound manner, and shall be in accordance with all applicable federal, state, and local regulations in effect for the type, volume, contaminant concentration, and classification of the removed material.
- (6) As part of the required procedure for the permanent removal of any underground storage tank system from service, the owner or operator shall determine whether or not any prior release of a stored regulated substance has occurred from the system.
 - (A) This determination shall be performed subsequent to the submittal of notification to the executive director as prescribed in §334.6 of this title (relating to Construction Notification), but prior to completion of the permanent removal from service.
 - (B) This determination shall be made by visual inspection of the area in and immediately surrounding the excavation zone for any above-ground releases and for any exposed below-

ground releases, and by using one or both of the following methods or procedures:

- (i) The continual operation (through the time that the stored regulated substances are removed from the underground storage tank system) of one or more of the external release monitoring and detection methods operating in accordance with §334.50(d)(4) through (d)(8) of this title (relating to Release Detection); or
- (ii) The performance of a comprehensive site assessment in accordance with the requirements of subsection (e) of this section.

(C) Any methods or procedures used to make this determination shall be capable of detecting any prior release of stored regulated substances from any portion of the underground storage tank system.

(D) Upon completion of this determination, the owner or operator shall:

- (i) Report any confirmed or suspected releases to the executive director and comply with all applicable release investigation and corrective action requirements, as prescribed in subchapter D of this title (relating to Release Reporting and Corrective Action).
- (ii) Prepare or assemble the detailed written records of this determination, which shall include the methods, procedures, results, and names, addresses, and telephone numbers of the persons involved in conducting such determination. Such records shall be maintained in accordance with the applicable provisions in subsection (f) of this section, and a copy of such records shall be filed with the commission in conjunction with the applicable tank registration requirements of §334.7 of this title (relating to Registration).

(7) For an underground storage tank to be considered permanently out of service, the owner or operator shall either remove the tank from the ground in accordance with subsection (b) of this section, abandon in-place and fill the tank with an acceptable solid inert material in accordance with subsection (c) of this section, or conduct a permanent change-in-service in accordance with subsection (d) of this section. Unused tanks (e.g., tanks at facilities which are closed or out

of business) shall be considered temporarily out of service, and shall be subject to the provisions of §334.54 of this title (relating to Temporary Removal from Service), unless they have been permanently removed from service in accordance with this section.

- (8) The requirements in this section are applicable to all underground storage tanks which are permanently removed from service on or after the effective date of this subchapter.
- (9) For an underground storage tank permanently removed from service prior to the effective date of this subchapter, where the methods previously used for the release determination or the removal from service are unknown or are determined to have been inadequate, the executive director may require the owner or operator to conduct any or all of the following additional activities as appropriate:
 - (A) Proper removal of the UST system from service, in accordance with the applicable provisions of this section;
 - (B) Completion of a comprehensive site assessment, in accordance with the requirements of subsection (e) of this section;
 - (C) Release reporting, investigation, and corrective action if a release of a regulated substance has occurred, in accordance with subchapter D of this title (relating to Release Reporting and Corrective Action); and/or
 - (D) Any other activities necessary to prevent any adverse impacts on human health and safety and the environment.
- (b) Removal from the ground. In addition to the requirements of subsection (a) of this section, the following requirements shall be applicable for the removal of underground storage tanks from the ground:
 - (1) Except as provided under paragraph (2) of this subsection, tanks shall be properly emptied, cleaned, and purged of vapors prior to removal from the ground, in accordance with accepted industry procedures commonly employed for the stored regulated substance.
 - (2) When an owner or operator can demonstrate good cause for removal of a tank from the ground prior to emptying, cleaning, or purging the vapors, the owner or operator shall obtain approval from the manager of the appropriate district office (or the manager's designated representative) prior to proceeding with the removal. In this situation, the tank removal shall be accomplished only under the direct supervision of commission personnel

and/or local fire officials, and all conditions and requirements imposed by such supervisory officials shall be strictly followed.

(3) Prior to removing the tank from the ground, all connected piping and other ancillary equipment shall be emptied, disconnected, and properly plugged, capped, or removed.

(4) Storage of removed tanks.

(A) After removal, a tank shall be transported from the site within 24 hours of removal, unless prior approval of a longer on-site storage period is obtained from the manager of the appropriate district office (or the manager's designated representative).

(B) The on-site storage of tanks for a period of 24 hours or less shall be in a designated temporary storage area which shall be an adequate distance from known ignition sources and which shall be clearly identified with appropriate barriers and warning signs to restrict access by unauthorized persons.

(C) On-site storage of removed tanks for more than 24 hours (when approved by the district manager), and off-site storage for any period, shall only be allowed in locked, securely fenced, or similarly restricted areas where unauthorized persons will not have access.

(D) No later than 24 hours after removal, all removed tanks (regardless of condition) shall be legibly and permanently labeled (in letters at least 2-inches high) with the name of the former contents, a flammability warning (if applicable), and a warning that the tank is unsuitable for the storage of drinking water or the storage of human or animal food products.

(E) The residual vapor levels in any removed tank which is stored at the UST facility shall be maintained at non-explosive and non-ignitable levels for the entire time that the tank remains at the facility.

(F) Regardless of where the tank is stored, not later than ten days after the tank has been removed from the ground, any residual liquids or vapors shall be permanently removed to render the tank non-ignitable and non-explosive.

(5) Transportation and disposal of removed tanks.

(A) The methods and procedures used for the handling, transporting, and disposing of any removed underground storage tanks (and parts of such tanks) shall be protective of human

health and safety and the environment, and shall be in accordance with all applicable federal, state, and local regulations.

(B) Removed tanks (and any parts of such tanks) which have been emptied, thoroughly cleaned of all remaining substances and any remaining residues, and permanently purged of vapors may be appropriately disposed by scrapping, junking, or reusing for purposes unrelated to the underground storage of regulated substances.

(C) Prior to transporting any removed tank from the UST facility, the following minimum preparation procedures shall be followed:

- (i) The remaining regulated substances shall be removed, and visible residues or sediments shall be cleaned from the tank as completely as possible, in accordance with commonly-used and accepted industry practices;
- (ii) Residual vapor levels in the tank shall be reduced to non-explosive and non-ignitable levels, and shall be maintained at such levels during the entire period of transportation.
- (iii) All holes and openings shall be properly plugged or capped, except for one 1/8-inch diameter vent hole positioned at the top of the tank during transportation.

(D) The subsequent reuse of any removed tanks for the underground storage of regulated substances (whether on-site or off-site) shall only be allowed under the provisions of §334.53 of this title (relating to Reuse of Used Tanks).

(6) The tank owner shall develop and maintain a permanent record of the prior location of the removed tank, the date of removal, the substance previously stored, the method of conditioning the tank for removal, the methods of handling, transportation, storing, and disposing of the tank, the names, addresses, and telephone numbers of the person conducting the activities, and any information regarding any known releases from such tank. If the facility owner is not the same person as the tank owner, the tank owner shall provide a copy of such information to the site or facility owner within 30 days after the date of removal.

(c) Abandonment in-place. An underground storage tank may be permanently removed from service by abandonment in-place in lieu of actual removal from the ground. In addition

to the requirements of subsection (a) of this section, the following requirements shall be applicable to the abandonment in-place of underground storage tanks.

- (1) When the underground storage tank owner is not the owner of the site or facility where such tank is located, the tank owner is prohibited from abandoning such tank in-place unless the following conditions are met:
 - (A) The tank owner shall provide written notice to the owner of the site or facility for the abandonment in-place prior to initiating the activity.
 - (B) After completion of the abandonment in-place, the tank owner shall provide to the site or facility owner a legible copy of the permanent record of the abandonment, as described in paragraph (3) of this subsection.
- (2) Any tank that is abandoned in-place shall be filled with a solid inert material as prescribed in this subparagraph.
 - (A) Only solid inert materials which are free of any harmful contaminants or pollutants shall be used to fill the tank. Acceptable materials include sand, fine gravel, sand and gravel mixtures, and cement/concrete-based slurries. Other materials such as native soils, drilling muds, and commercially-marketed fill materials shall not be used for filling the tank unless the material and filling procedures have been reviewed and approved by the executive director in accordance with §334.43 of this title (relating to Variances and Alternative Procedures).
 - (B) Adequate access openings shall be made in the top of the tank, and the tank shall be filled as completely as possible. Voids and air pockets shall be eliminated.
 - (C) The fill material and filling procedures shall be adequate to assure that:
 - (i) The filled tank will not surface after completion of the filling operation;
 - (ii) Any settling or instability of the ground surface subsequent to the abandonment in-place is minimized or eliminated;
 - (iii) The fill materials will form a permanent solid inert filler that can be expected to remain structurally stable in the ground to prevent cave-ins, even after the subsequent deterioration of the tank walls; and

- (iv) The filled tank and associated piping are disconnected and capped or sealed so as to preclude their future use for any storage or disposal purposes.
- (3) The tank owner shall develop and maintain a permanent record of the name and address of the tank owner (and site or facility owner, if different), the abandoned tank location, the date of abandonment, the substance previously stored, the method of conditioning the tank for abandonment, release assessment results, the names, addresses, and telephone numbers of the persons conducting the activities, and information regarding the extent of any confirmed releases and any resulting remediation activities.
- (A) When the tank owner is not the owner of the facility where the tank is located, the tank owner shall provide to the current facility owner a legible copy of the permanent record of the abandonment in-place. Such information shall be provided no later than 30 days after completion of the abandonment in-place.
- (B) The facility owner shall maintain a permanent record of the tank abandonment in-place in accordance with subsection (f) of this section.
- (C) Prior to the sale or conveyance of the facility where an abandoned underground storage tank is located, the facility owner shall provide written documentation of the tank abandonment information to the succeeding property owner.

TEXAS WATER COMMISSION

B. J. Wynne, III, Chairman
John E. Birdwell, Commissioner
Cliff Johnson, Commissioner



John J. Vay, General Counsel
Michael E. Field, Chief Hearings Examiner
Brenda W. Foster, Chief Clerk

Allen Beinke, Executive Director
December 12, 1990

Mr. John J. Crocker
P.O. Box 1636
Victoria, Texas 77902

Re: UST abandonment at Crocker Roofing & Sheet Metal Co., 3505 Houston Hwy., Victoria, Texas; Activity scheduled on December 28, 1990; TWC UST Facility No. 19680; Notification received by TWC on December 3, 1990.

Dear Mr. Crocker:

This letter acknowledges receipt by the Texas Water Commission (TWC) of notification for the above-referenced underground storage tank (UST) construction activity. TWC regulations which apply to construction notification are included in 31 TAC Section 334.6. Notification must normally be submitted on an authorized form and be received by TWC at least 30 days prior to construction.

A copy of your notification has been sent to the TWC district office indicated below. The time and scope of this activity must be confirmed with the district UST personnel 24 to 72 hours before the activity in order to arrange an inspection. Any rescheduling of the proposed construction must be coordinated and/or approved by authorized district personnel. Upon completion of construction, the attached UST registration form must be completed and returned to this office.

Technical requirements which apply to various UST construction activities are included in 31 TAC Chapter 334, Subchapter C. Also effective December 1, 1990, all UST installations, repairs, and removals must be conducted by a registered UST contractor who has a licensed installer or on-site supervisor at the site during all critical junctures, as required by 31 TAC Chapter 334, Subchapter I.

For further assistance, please contact the Technical Services Section, Petroleum Storage Tank Division, at (512)371-6200, or the TWC district UST personnel indicated below.

Sincerely,

Grace T. Schuyler

Grace T. Schuyler
Technical Services Section
Petroleum Storage Tank Division

Enclosure: TWC UST Registration Form
901203045/late

District Representative: Mr. Mickey Garza, TWC District 12 Office, 4410 Dillon Lane, Suite 47, Corpus Christi, Texas 78415-5326; Telephone: (512) 851-8484.

Texas Water Commission
Underground Storage Tank Contractor
Certificate of Registration
(NON-TRANSFERABLE)

Be it known that

Station Equipment and Maintenance, Inc.

is duly registered as an Underground Storage Tank Contractor and may engage in the installation, repair, and removal of underground storage tanks within the State of Texas, pursuant to Title 31, Texas Administrative Code, Chapter 334, Subchapter J. This certificate will be valid for one year from the date of issuance.

Registration No.: CRP000002

Date of issuance: April 1, 1990



Chairman
Texas Water Commission





Executive Director
Texas Water Commission

JORDAN LABORATORIES
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS 78403

DECEMBER 6, 1990

REPORT OF UNDERGROUND STORAGE TANK SOIL ANALYSES

STATION EQUIPMENT AND MAINTENANCE, INC.
SITE: CROCKER ROOFING

METHODS: TPH EPA 3550 & 418.1
BTEX EPA 5030 & 8020

LAB NO.	SAMPLE IDENTIFICATION	SAMPLE DATE	TPH MG/KG	BENZENE ETHYL-BZ TOLUENE XYLENES MOISTURE				
				-----	-----	-----	-----	WT %
28-10039	BORING #1 8'	11-27-90	(5	(1	(1	(1	(1	22.7
28-10039	BORING #2 8'	11-27-90	(5	(1	(1	(1	(1	13.4
28-10040	BORING #3 8'	11-27-90	(5	(1	(1	(1	(1	15.8
28-10041	BORING #4 8'	11-27-90	30	(1	(1	(1	(1	15.5

NOTES:

BASIS SAMPLE DRIED AT 105 DEGREES C.
TPH & TDS ANALYSIS DATES: 12-5-90
BTEX ANALYSIS DATES: 12-4-90
BTEX QA DATES: 12-4-90
FILE: SEM29.DAT

SIGNED: Carl F. Crownover
CARL F. CROWNOVER

ROOFING CRACKER

Chain of Custody/Analytical Request.

Company: S F & M INC
Address: 302 INDUSTRIAL DR VICTORIA, TX
Type of Sampling: TVBF
Sample Collector: DAWN WENDT
Sample Preservation Codes: ICE

Location/ Sample No.	Date/Time Sampled	Preservation Codes	# Bottles
BORING 1 - 8' DEEP	11/27/90	8:30 AM ICE	1
BORING 2 - 8' DEEP	11/27/90	9:30 AM ICE	1
BORING 3 - 8' DEEP	11/27/90	10:15 AM ICE	1
BORING 4 - 8' DEEP	11/27/90	11:00 AM ICE	1

Instructions:

TPH + BETX

Custody Records:

Sampler	Date/Time Received	Date/Time Released
<u>Dawn Wendt</u>	* 11/27/90 3:00	

Lab Rep	<u>Dawn</u>	* 12/3/90 1140*
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Other	*	*
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Other	*	*
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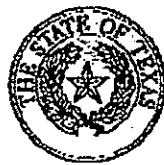
Shipping:

To:

Delet _____ How Sent:

4 40 00 7 0 12 00 1
U 01201004211# 21 6

Barry R. McBee, Chairman
R. B. "Ralph" Marquez, Commissioner
John M. Baker, Commissioner
Dan Pearson, Executive Director



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

February 20, 1997

Mr. John Crocker
Crocker Roofing & Sheet Metal Company
P.O. Box 1636
Victoria, Texas 77902

Re: Release Determination Activities at the Crocker Roofing & Sheet Metal Company facility,
3505 Houston Highway, Victoria (Victoria County), Texas (Facility ID No. 19680)

Dear Mr. Crocker:

We have completed our review of the investigation and release determination activities conducted at the above-referenced facility as provided in the reports submitted to our Office. Based upon the information submitted to us, we concur with your conclusion that there does not appear to have been a release at this site in excess of action levels. This site is not listed as a leaking petroleum storage tank site. With the provision that the submitted information is correct and representative of actual site conditions, as attested to by you, no further action regarding the release determination is required.

Please note that there may be additional requirements regarding any existing underground or aboveground storage tanks at this site, including tank registration and technical standards provisions.

Should you have any questions, please contact Ms. Chris Chandler of my staff at 512/239-2200. Your cooperation in this matter has been appreciated.

Sincerely,

Anton Rozsypal, Manager
Responsible Party Investigation Section
Petroleum Storage Tank Division

19680.nol

cc: Silvia Contreras, TNRCC Region 14 Field Office
(6300 Ocean Drive, Ste. 1200, Corpus Christi, TX 78412)

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

March 17, 1997

Mr. John Crocker, President
Crocker Roofing & Sheet Metal Company
P. O. Box 1636
Victoria, Texas 77902

Re: Clarification of letter Dated February 7, 1997 for Underground
Storage Tank (UST) System Permanent Removal From Service
(Abandonment-in-Place) at Crocker Roofing & Sheet Metal
Company, 3505 Houston Highway, Victoria (Victoria County), Texas
Facility ID: 19680

Dear Mr. Crocker:

Thank you for your request for assistance regarding the clarification of letter dated February 7, 1997 (enclosed). Based on the information submitted by Station Equipment and Maintenance, Inc., it appears that the UST system Abandonment-in-Place meets the general requirements of Title 30, Texas Administrative Code (TAC) §334.55, the Texas Natural Resource Conservation Commission (TNRCC) rules for UST system permanent removal from service. Please find enclosed that section of the rules which covers permanent removal from service for your information.

The TNRCC appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you have any questions, please contact Sinoel Contreras of my staff at 512 980-3100.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Russell Lewis".

C. Russell Lewis
Waste Program Manager
Corpus Christi Region 14

SBC/sbc

cc: Allen Martinets, Technical Services Section, PST Division
James Wayne, James Wayne Properties, 2608 North Laurent Street, Victoria, TX 77901

REPLY TO: REGION 14 • 6300 OCEAN DRIVE • CORPUS CHRISTI, TEXAS 78412 • AREA CODE 512/980-3100 • FAX 512/980-3101

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000