Management of Oil and Gas Waste at TCEQ Regulated Facilities

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TCEQ Waste Permits Division

Mission: Authorize safe management of solid waste in Texas.

- Industrial and Hazardous Waste Permits
- Municipal Solid Waste Permits

Also administers:

- Regional Solid Waste Grants Program
- Scrap Tire Program
Oil and Gas Statutes and Regulations

- Natural Resources Code §91.1001 defines oil and gas (O&G) waste
- Texas Health & Safety Code §361.003(34) excludes O&G exploration and production (E&P) waste from definition of “solid waste”
- TCEQ regulates solid waste
Regulation of O&G Waste in Texas

- Memorandum of Understanding (MOU) between RRC and TCEQ
- Codified thru’ rulemaking
  - 16 Tex. Admin. Code § 3.30
- Need for agreement – statutory directive
- Statement of how agencies implement the division of jurisdiction
O&G Waste Management in TX

- Increased coordination between state agencies to ensure safe management of wastes in O&G waste
Regulation of O&G Waste in Texas

- In general, RRC regulates O&G waste in Texas
- RRC authorizes commercial & non-commercial management of O&G waste
Management of Oil and Gas (O&G) Wastes

- O&G wastes historically disposed at RRC-authorized pits and land application facilities
  - RRC Jurisdiction
- Requests for disposal of O&G waste in MSW landfills due to significant increase in O&G exploration and production
  - TCEQ Jurisdiction
Regulation of O&G Waste in Texas

• The RRC must specifically authorize management of wastes under its jurisdiction at facilities regulated by TCEQ
• Concurrence of TCEQ is required to manage O&G under RRC jurisdiction at a TCEQ facility
• Waste disposal subject to TCEQ rules for “special waste” and industrial waste
  • 30 Tex. Admin. Code §330.3(148)
  • 16 Tex. Admin. Code §3.30.(e)(3)
Regulation of O&G Waste in Texas

- Waste disposal subject to TCEQ rules for “special waste” and industrial waste
  - 30 Tex. Admin. Code §330.3(148)
  - 16 Tex. Admin. Code §3.30.(e)(3)

- Disposal of O&G waste as special waste must be authorized by:
  - Facility permit, or
  - Case-by-case via TCEQ Form -0152
O&G Waste Management at MSW Facilities

- Meet MSW permit conditions
- No free liquids - “paint filter test”
- Constituents of concern (COC)
  - Table 1, Appendix 1 of 30 TAC, 335 Subchapter R
  - Class 1 limits Benzene and RCRA 8 metals
- Total Petroleum Hydrocarbons (TPH)
  - TPH <1,500 ppm – Type I landfill
  - TPH > 1,500 ppm - Class 1 cell
Permitted Municipal Solid Waste Landfills in Texas

Municipal Solid Waste Landfills
Facility Type and Count
- 1 (101)
- 1AE (33)
- 4 (22)
- 4AE (21)
- 1AE & 4AE (16)
- Monofill (4)
TCEQ Jurisdiction

- Wastes generated at oil field service facilities that provide equipment, materials, or services to the O&G industry
- Wastes from O&G activities that are processed, treated, or disposed of at a solid waste management facility authorized by the TCEQ
- Residential-like waste generated from the living quarters located on the lease
RRC Jurisdiction

• Wastes associated with the exploration, development, or production of O&G
• Injection wells to dispose of O&G wastes
• Naturally Occurring Radioactive Material (NORM) waste from O&G activities
• Processing, recycling, separation, and reclamation
RRC Jurisdiction

- Wastes from transportation by pipeline and storage of crude oil (including tank bottoms) before it enters a refinery
- Wastes from the transportation of natural gas by pipeline prior to use in the manufacturing process or residential/industrial use
- Vacuum truck rinsate and tank rinsate generated at RRC-regulated O&G waste hauler facilities
What’s New?

- RRC issues permits authorizing oil and gas waste separation activities conducted at MSW Landfills
- RRC – TCEQ coordination
- Household like garbage generated at temporary O&G worker housing located on an O&G lease
  - TCEQ jurisdiction
  - Not required to be managed as special waste
Oil and Gas (O&G) – Environmental Complaints

• O&G exploration, production, and transportation: RRC
• Odor – Nuisance odors are investigated by the TCEQ
• Noise, traffic, dust from public roads – Local law enforcement agencies
• Process wastewater discharged from O&G sites; Storm water run-off from O&G sites: U.S. EPA
• Drinking Water
  • Suspected contamination in private wells: report to RRC
  • Concerns related to public drinking water supply: report to TCEQ.
Summary

- In general, RRC has jurisdiction over O&G waste
- Concurrence of RRC and TCEQ is required to manage O&G waste at TCEQ facilities
- Household like garbage from temporary O&G worker housing (not comingled with oilfield wastes) is regulated by TCEQ
- RRC issues permits to conduct O&G waste separation at TCEQ-authorized MSW landfills
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Questions?

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