Use of Software Programs for TRRP

Private vendors are selling software programs designed to calculate protective concentration levels for TRRP. Much effort and investment has gone into the development of the software and calculation of TRRP PCLs will be made simpler by the use of such tools. TCEQ applauds such initiatives as they support implementation of TRRP. However, the TCEQ is receiving Affected Property Assessment Reports (APAR) where it appears that the software is being improperly relied upon as a sole measure of compliance. Users of the software need to be aware of several things.

First, the software, when used properly in the context of TRRP rule and policy will facilitate compliance with TRRP. However, the user must exercise responsible use of the software in order for TRRP compliance to be achieved.

Second, agency rules and policies must be complied with. The software and associated manuals do not supercede either the TRRP rule or TRRP policy. TCEQ is confident that great care has been exercised in the preparation of the software to make the PCL calculations compliant with TRRP rule and policy. However, if there are any instances where the software and TRRP rule or policy are in conflict, the TRRP rule or policy sets the compliance requirement.

Third, use of the software does not guarantee full compliance with the TRRP rule. The PCL calculations results must be submitted in the APAR format. If the software output reports are not in the same format as the APAR forms, then the results will need to be transferred into the APAR format prior to submission to TCEQ. Further, when Tier 2 or 3 PCLs are developed, the input values must be specifically identified in the APAR and the basis of those values must be provided and demonstrated to be appropriate for the affected property. The results calculated from the software, albeit they may be mathematically correct, are inappropriate for use when the input values are not representative of conditions at the affected property. Therefore, the basis and appropriateness of the input values must be substantiated and will be reviewed by the TCEQ.

Fourth, the software is not a TCEQ product and there is not blanket TCEQ approval of all results from use of the software.