

THINK



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Three New State-Lead Contracts Address UST Removal, Investigation and Clean Up

by Chris Brown

The Tank Management Branch has unveiled updated state-lead contracts for use in addressing orphaned and abandoned USTs and releases. Previous contracts for UST removal, abandonment & overexcavation services; and hydrogeologic investigation services recently expired. To replace the contracts, the Branch announced Requests for Proposals, hosted pre-bid meetings and reviewed stacks of proposals from a large number of contractors and consultants. Successful bidders were selected, contract negotiations conducted, and agreements finalized with five UST removal contractors and five consulting firms.

The contracts are primarily for use in the Branch's Fund for the Inability to Rehabilitate Storage Tanks (FIRST Fund), available to identify and remediate properties where there is no known UST owner, or the tank owner is unable to pay for required work. Through FIRST Fund, tanks have been decommissioned and investigations conducted at dozens of sites throughout Delaware.

Several properties, however, are in need of aggressive remediation, so the Branch is now using a third contract, the new Pay for Performance (PFP) contract for state-lead remediation services. Contracts were recently signed by six remediation contractors who will be receiving requests for site-specific clean up proposals. As new releases are identified and investigated through the new contracts, more sites are expected to be cleaned up under the PFP contract.

The following firms have been selected:

UST Removal, Abandonment & Overexcavation Services

BrightFields, Inc.
Coastal Pump & Tank, Inc.
First State Petroleum Services, Inc.
J & M Industries, Inc.
Joseph T. Hardy & Son, Inc.

Hydrogeologic Investigation Services

EA Engineering, Science and Technology
Environmental Alliance
Groundwater & Environmental Services, Inc.
Kleinfelder
URS Corporation

Pay for Performance Environmental Remediation

BrightFields, Inc.
EA Engineering, Science and Technology
Environmental Alliance
GHR Consulting Services, Inc.
Groundwater & Environmental Services, Inc.
Kleinfelder

Public Hearing for new UST Regulations to be scheduled soon.

No date has been scheduled yet — but October is likely. We will advertise it in:

The Delaware State News;
The News Journal;
The Delaware State Calendar:
<http://delaware.gov/egov/calendar.nsf/>
The DNREC website:
<http://www.dnrec.state.de.us/dnrec2000/Divisions/AWM/ust/>

TMB Receives National EPA Achievement Award

On June 13, 2007, Alex Rittberg, program manager of DNREC's Tank Management Branch, proudly accepted an EPA National Notable Achievement Award for the branch's efforts in supporting U.S. EPA Region 3 in cleaning up leaking underground storage tank sites. EPA's Notable Achievement Award Program is a unique opportunity for the USEPA's National Program Offices to recognize the outstanding work of EPA Regions and States.

The award recognized Delaware's Tank Management Branch for assisting EPA Region 3 in exceeding cleanup goals for 2006. EPA Region 3 accomplished 1,565 cleanups in FY 2006, which allowed Region 3 to maintain the lowest percentage of open LUST cases in the nation, 17%. Over the last five years, Delaware has historically cleaned up 70-80 LUST sites per year using our risk-based corrective

action process. With the help of Delaware and other EPA Region 3 states, the national LUST program surpassed its goal of completing 13,600 cleanups!

Delaware was also recognized for contributing to the success of two major EPA training events for government employees. The first of these events focused on ethanol compatibility and cleanup issues. The second was a technical conference for LUST cleanup project managers. The LUST technical conference was attended by over 200 representatives from state LUST programs, industry, academia, trade associations, the insurance industry and USEPA offices and included discussions on new technologies and how to more quickly bring sites to closure.

Delaware is very honored to be recognized by this program.

Kudos to all TMB staff members for their contributions to this group success.



New Ethanol Sampling Requirement

by Pat Ellis

Ethanol has now been a component of gasoline sold in Delaware for over a year. Therefore, beginning in September, the TMB will require sampling for ethanol as part of leaking underground storage tank (LUST) projects. This sampling will be required on at least a one-time basis when LUST projects move into Delaware Risk-Based Corrective Action Program (DERBCAP) Tier 1 investigations. Ethanol sampling in groundwater will be required for any site where gasoline was stored and tanks were in use anytime after April 2006. Soil sampling for ethanol near the source of the release may be required on a site-by-site basis during Tier 0 investigations, depending upon whether the release is recent. In addition, existing LUST sites with active UST systems will also be subject to at least a one-time ethanol sampling of groundwater if there is a concern that an ongoing release is occurring at the facility.

Ethanol analysis may be performed using several methods. To minimize costs, the laboratory method currently utilized for BTEX and other fuel oxygenates during Tier I assessments (EPA Method 8260), may also be utilized for ethanol analysis. Other meth-

ods are available which give lower detection limits, but all laboratories may not be able to perform these methods. The laboratory used will need to acquire calibration standards for ethanol. Risk-Based Screening Levels have not yet been established for ethanol in soil or groundwater.

Ethanol should be highly biodegradable in both soil and groundwater. The concern is that high levels of ethanol can:

- cause free-phase light non-aqueous phase liquid to become more mobile;
- increase BTEX solubility;
- create a significant demand on oxygen and other electron acceptors so that BTEX degradation is reduced and plume lengths increase; and
- cause increased levels of methane in groundwater and soils.

The TMB is requiring a closer look at ethanol at LUST sites due to ethanol's potential to adversely affect plume behavior and remediation efforts at some sites where it is present.

UST Removal or Abandonment in Emergency Situations

by Suzanne Halter

Certified UST removal and abandonment contractors are very familiar with the 10-day notification that is required by the TMB prior to performing routine UST work. Unfortunately, not all UST removals or abandonments are routine. The TMB has designed an alternative to the 10-day notification process for USTs that have a legitimate reason for an emergency removal or abandonment. The TMB should be notified of any non-routine tank closure. This will ensure that the appropriate analyses are performed for those tanks that require the collection of soil samples. As with routine tank closures, sampling will be optional for unregulated tanks, provided that sufficient evidence exists that the tank is unregulated and no evidence of a release is observed.

Most emergency removals or abandonments occur during construction or roadwork. When a previously-unregistered UST is discovered during construction or roadwork, the contractor must call the TMB and talk directly with Ron Brown, the administrator of the UST removal/abandonment database. If Ron is not available, they must speak with another project officer (PO) and make a note of who they spoke with for future reference. Since this was a previously unknown UST discovered during an ongoing construction project, work does not need to be stopped until a certi-

fied UST Contractor is retained. The contractor performing the construction may do the removal and sampling, provided they follow the TMB guidance documents.

The contractor must detail the circumstances that make this an emergency (i.e., sidewalk, road or parking lot work, or other construction project which turns up a previously-unregistered UST). Ron or the PO will give the contractor permission to proceed with removal or abandonment. The contractor must fax over a preliminary notification form within 48 hours of the removal or abandonment. On the line for the tank owner's signature, they should write: "Verbal to perform UST work given by (*insert name of person they actually spoke to*)" and the date they spoke to them.

The contractor or tank owner must also submit a follow-up notification form (faxed or mailed) that includes the tank owner's signature within 14 days. All other TMB procedures and guidance for the removal or abandonment must be followed, except for the 10-day notification and use of a certified UST contractor. In addition, if there is any evidence of a release from the UST, it must be reported to the DNREC's Toll-Free 24-Hour Complaint Line at 1-800-662-8802 and the TMB must be notified.

Policies and Procedures for Routine Tank Closures

by Ron Brown

Several months have passed since a letter describing the long-established requirements for closure (removal or abandonment) of USTs was sent to the certified contractors. Those procedures include closure of regulated USTs, closure of unregulated USTs, no further action (NFA) letters, and properly completed original Removal/Abandonment notification forms that are legible and signed by the owner. The contents of this letter are published here as a reminder to all.

The DNREC (the Department), TMB has established requirements for the closure of USTs. Regulated USTs, such as those greater than 110 gallons that store motor fuel, hazardous substances, or fuel for emergency generators, must always follow these closure requirements. These requirements are listed below for your convenience.

The Department has a long-standing policy of issuing NFA letters for the closure of unregulated USTs that have no or limited residual contamination when Department closure requirements are met. Unregulated USTs may include residential heating oil tanks

with a capacity of 1,100 gallons or less, and agricultural or residential motor fuel tanks 1,100 gallons or less and are used for non-commercial purposes. However, in order to qualify for a NFA letter, the USTs *must be closed in accordance with the requirements for closure of regulated USTs.*

These requirements include:

- the use of a Department-certified UST Closure Contractor for all tank work,
- submittal of a Department-approved notification form ten (10) days or more prior to the closure, and
- the collection of soils samples.

Notification forms must be legible and a form *with the tank owner's signature* must be received prior to the closure activity. The Department will stop regulated tank closure activities if the signed notification is not received prior to commencement of closure activities. An unregulated tank closure will be permitted to continue if the signed notification is not received,

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Announcements

Chris Brown — Congratulations to Chris for his recent promotion to Hydrologist III. In addition to working on LUST sites throughout the state, he leads the FIRST Fund Work Group and serves on Delaware's Source Water Program Citizen/Technical Advisory Committee.

Peter Rollo — Congratulations to Pete for his appointment to the National Workgroup on Leak Detection Evaluations (NWGLDE). As a committee member, he will be reviewing 3rd party certifications of leak detection equipment used in underground and aboveground storage tank systems.

Tripp Fischer — Congratulations to Tripp for his appointment to the role of Co-Team Leader for the Interstate Technology and Regulatory Council's Light Nonaqueous Phase Liquids (LNAPL) Remediation Team. Tripp and Pam Trowbridge from the Commonwealth of Pennsylvania will lead the 50 member team for the next two years in developing a LNAPL Remediation Guidance Document.

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but the site will be ineligible for a NFA letter.

All soils samples must be collected in accordance with *Notification and Sampling Requirements for Underground Storage Tank Abandonment or Notification and Sampling Requirements for Underground Storage Tank Removal*. Any deviation from these sampling requirements must be previously approved by the TMB project of-

ficer assigned to the site.

Requests for NFA letters for unregulated UST closures that do not strictly adhere to these requirements will be denied.

Thank you in advance for your cooperation in making the Removal/Abandonment notification form, closure of regulated USTs, closure of unregulated USTs, and the NFA letter process flow in a smooth and timely manner.

<http://www.dnrec.state.de.us/dnrec2000/Divisions/AWM/ust/>

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