

Petroleum Tank Cleanup Section

Where We are Going

2024 Vision

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Purpose

Pertaining to RP/Consultant & DEQ

- Clarify Roles
- Simplify Process
- Guided by Administrative Rules of MT

Who's Involved in a Release

- Owners/Operators
- Consultant
- DEQ Environmental Scientist
- Funding Mechanism
- Local governments, county sanitarians, tribal entities, EPA, other
- Underground Storage Tank Program



Owner/Operators – Responsible Party

- ARM 17.56 Chapter 5
Reporting/Confirming a release
- ARM 17.56 Chapter 6
Initial Response/Investigation/Cleanup

ARM 17.56 Chapter 6

- 17.56.604 Remedial Investigation
 - “(1) In order to determine the full extent and location of soils contaminated by the release...**owners and operators** must conduct a remedial investigation of the release...”

ARM 17.56 Chapter 6

- 17.56.605 Cleanup

“(1) ...If a plan is required, **owners and operators** must submit the plan according to a schedule and format established by the department...”

Consultant

- Technical expert hired by the O/O to assist with the corrective-action process.

- Geologist/Engineer/Scientist

Experience with subsurface releases

- Understanding of ARMs
- Familiar with DEQ Guidance Documents



DEQ

- Petroleum Tank Cleanup - Regulatory Authority
 - Suspect Releases
 - Confirmed Releases
 - Investigations
 - Cleanups
 - Compliance Monitoring
 - Release Resolution



Funding Mechanisms

- Responsible Party
- Grants
- Brownfields
- Insurance
- PTRCB Fund Staff
 - PTRCF Board
- Other



The Process – Work Plan Submission

- Work Plan Submission – Consultant submits a work plan on the O/O's behalf.
 - Work Plan Request (Optional)
 - Scope of work tasks
 - Schedule – O/O's input
 - PTRCB – budget

Remedial Investigation

- 17.56-604 (1) In order to **determine the full extent** and location of soils contaminated by the release and the presence and concentrations of free and dissolved product contamination in the surface water and in ground water, owners and operators must conduct a remedial investigation of the release, the release site, and the surrounding area possibly affected by the release



Cleanup

- 17.56-605 (2) In order to prepare the cleanup plan, owners and operators must properly evaluate and interpret the field and analytical results of the site or remedial investigation to define the extent and magnitude of free product, adsorbed phase product, dissolved phase plume and vapor phase product.

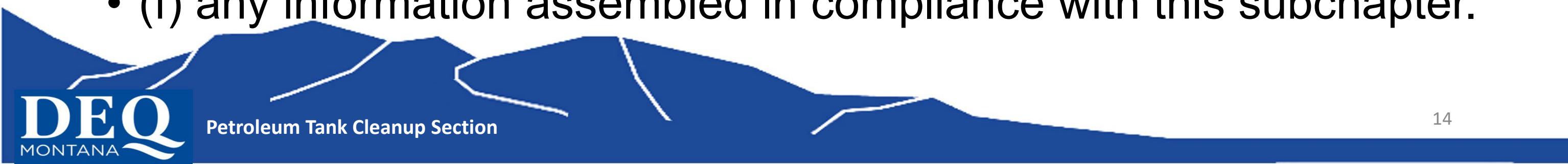
Local Government Review

- 15-day comment period
 - County Sanitarian
 - PTRCB Fund Staff
 - Other as needed
 - Tribal
 - EPA

Process for Work Plan Approval

(ARM 17.56.605)

- (a) the physical and chemical characteristics of the regulated substance, including its toxicity, persistence, and potential for migration;
- (b) the hydrogeologic characteristics of the facility and the surrounding area;
- (c) the proximity, quality, and current and future uses of nearby surface water and groundwater;
- (d) the potential effects of residual contamination on nearby surface water and groundwater;
- (e) an exposure assessment that identifies routes by which receptors may be exposed to contaminants and estimates contaminant concentrations to which receptors may be exposed; and
- (f) any information assembled in compliance with this subchapter.



Process for Work Plan Approval (ARM 17.56.605)

- (5) The department will approve the cleanup plan only after **ensuring** that implementation of the plan will adequately **protect human health, safety, and the environment.**



Work Plan Approval Continued

- Work Plan Approval – DEQ approves the work plan
- Once DEQ approves a work plan, corrective action is expected to begin.
- “Obligation” language no longer accepted in work plans.
- Work will commence upon approval from DEQ and ~~obligation of funds from PTRCB.~~





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Take Aways

- Owner/Operator participation in the process.
- Discussions prior to generation/submittal of a work plan.
- Basic work plan request and work plan approval letters.
- Work Plan deficiencies sent back to consultant and owner.
- No “obligation” language in work plans.
- Owner/Consultant should be prepared to discuss technical questions
- Continued excellence in customer service from PTCS

Reminders

- Investigate the source area.
- Do not “speculate” in work plans or reports.
- Keep phases of work simple and separate
- Constant communication between all involved



Questions?