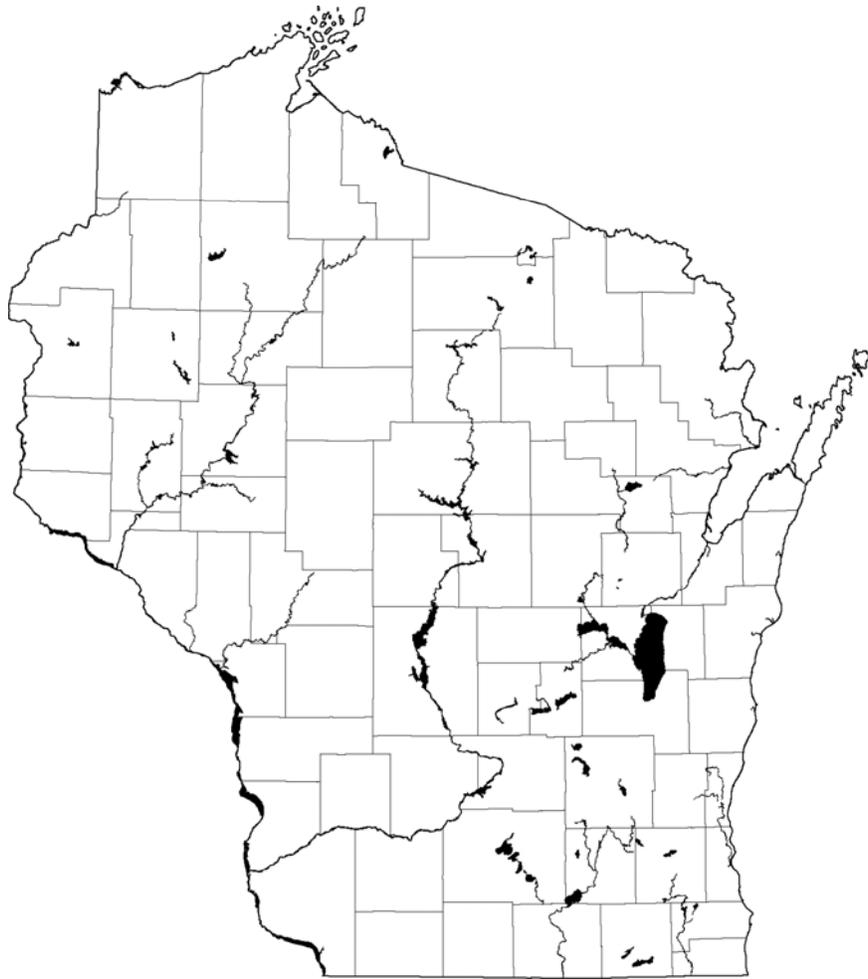


**ASSESSMENT AND REPORTING
OF
SUSPECTED AND OBVIOUS RELEASES
FROM
UNDERGROUND AND ABOVEGROUND
STORAGE TANK SYSTEMS**



FORWARD

A thorough assessment of underground and aboveground storage tank systems is crucial for the protection of public health and the groundwater and surface waters of the State of Wisconsin. The purpose of this publication is to explain the Department of Commerce's expectations and requirements for assessing and reporting suspected and/or obvious releases as well as system leaks from underground and aboveground storage tank systems.

Responsibility for maintaining this tank-system site assessment publication for chapter Comm 10 storage tank regulations has been transferred from the Department of Natural Resources (DNR) to the Department of Commerce's Environmental and Regulatory Services Division (Department). This publication replaces the site assessment guidance (Site Assessments for Underground Storage Tanks, Technical Guidance, September 1992, PUBL-SW-175 97), previously issued by the DNR.



Abbreviations and Acronyms

AST – Aboveground storage tank

DNR – Department of Natural Resources

DRO – Diesel range organics

EPA – U.S. Environmental Protection Agency

ERS – Environmental and Regulatory Services [Division]

ESA – Environmental site assessment

GRO – Gasoline range organics

LPO – Local program operator

PID – Photo-ionization detector

TSSA – Tank-system site assessment

USGS – United States Geological Survey

UST – Underground storage tank

VOC – Volatile organic compounds

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Attachment 1 – Release Reporting Questions and Answers

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Attachment 10 – Form ERS-8951, Tank System Service and Closure Assessment Report

I) INTRODUCTION

A) PURPOSE OF THIS PUBLICATION

This publication specifies technical procedures and prescribes a report form that are acceptable to the Department for complying with assessment and release reporting requirements in chapter Comm 10 and chapter NR 706. Given the large number and wide variety of underground and aboveground storage tanks found in Wisconsin, it is not possible to develop comprehensive practices applicable to every assessment situation. Therefore, if you encounter a situation not covered in this publication, contact the Commerce Environmental and Regulatory Services (ERS) Division using the contact information listed in section V below.

B) WHAT IS A TANK-SYSTEM SITE ASSESSMENT (TSSA)?

What a TSSA is not.

- 1) It is not an ASTM Phase I or II Environmental Site Assessment (E1527-05, E1903-02).
- 2) It is not a Site Investigation.
- 3) It is not restricted to an underground storage tank system (UST) closure.

The following terminology, “Site Assessment,” “Tank Closure Assessment” and “Site Investigation,” are just a few examples of language that has commonly been used to describe underground storage tank-system site assessments, especially UST closures. These terms have also been used interchangeably to describe comprehensive site investigations (SI), Phase I and II environmental site assessments (ESA) as well as tank closure assessments.

In order to provide some clarity, Commerce will use the following terminology – “tank-system site assessment” or TSSA. It is hoped that this terminology will eliminate any confusion regarding the Department’s expectations for assessments of underground and aboveground storage tank systems.

In this publication, tank-system site assessment (TSSA) means the process by which the Department expects tank system owners or operators to determine if their tank system or any component of that system has released hazardous substances into the soil, groundwater, or surface waters. This process includes, but is not limited to, observation of field conditions – such as stained soils; odors; pitting, holes, or cracks in tank system components; observable leaks; and elevated in-field soil gas readings – collection of soil samples for laboratory analysis of hazardous substances, and reporting of field observations and sampling results in a format prescribed by the Department. In general, TSSAs are to be performed at the time a UST or AST, or some component thereof, is to be taken out of service, or when a suspected or obvious release is encountered.

The term “Tank-System Site Assessor,” refers to individuals who maintain a chapter Comm 5 Tank-System Site Assessor certification. This certification authorizes these individuals to supervise and/or perform TSSAs.

C) PURPOSE AND NEED FOR THE TSSA

The purpose of the TSSA is to document whether a release from a UST or AST has occurred and, if so, from which part of the system (sources) it originated and how it occurred (causes). In general, a “release” is any discharge, including spilling, leaking, pumping, pouring, emitting,

emptying, leaching, dumping or disposal of a flammable or combustible liquid or a federally regulated hazardous substance into groundwater, surface water or subsurface soils [Comm 10.050 (103)]. There are two situations where a TSSA always must be performed:

- 1) Obvious release.
- 2) Tank system closure.

For a suspected release, a TSSA must be performed if any component of a tank system is found to not be tight.

The primary activities that can reveal a suspected or obvious release, and then trigger a need to perform a TSSA, include the following:

- 1) Tank system upgrade.
- 2) Tank system change in service to store a non-regulated substance.
- 3) Tank system repair.

“Tank system closure” is a procedure by which a tank system is evaluated and permanently rendered safe from contributing to human danger, fire, explosion, and environmental contamination. A “suspected” release [Comm 10.050 (113)] occurs where (1) there is an indication of a release, but there is no environmental evidence; or (2) there is environmental evidence, but the source is unknown. An “obvious” release [Comm 10.050 (76)] is where there is both environmental evidence and a known source. The only situation where a TSSA is required when there is neither a suspected nor obvious release is during a “Tank-System Closure.”

Although Comm 10 requires TSSAs, and applicable federal law requires the same, there are exceptions. Even though a TSSA may not be required in some instances, failure to perform one may limit an owner's ability to sell or lease their property, and may also result in significant revenue losses.

Although the presence of free-phase liquid, strong odors, stained soil or backfill, or other conditions make it obvious (an obvious release) that a release from the system has occurred, it is still necessary to complete a TSSA and report the findings to the DNR.

Figure 1 illustrates the process for determining if a TSSA must be performed.

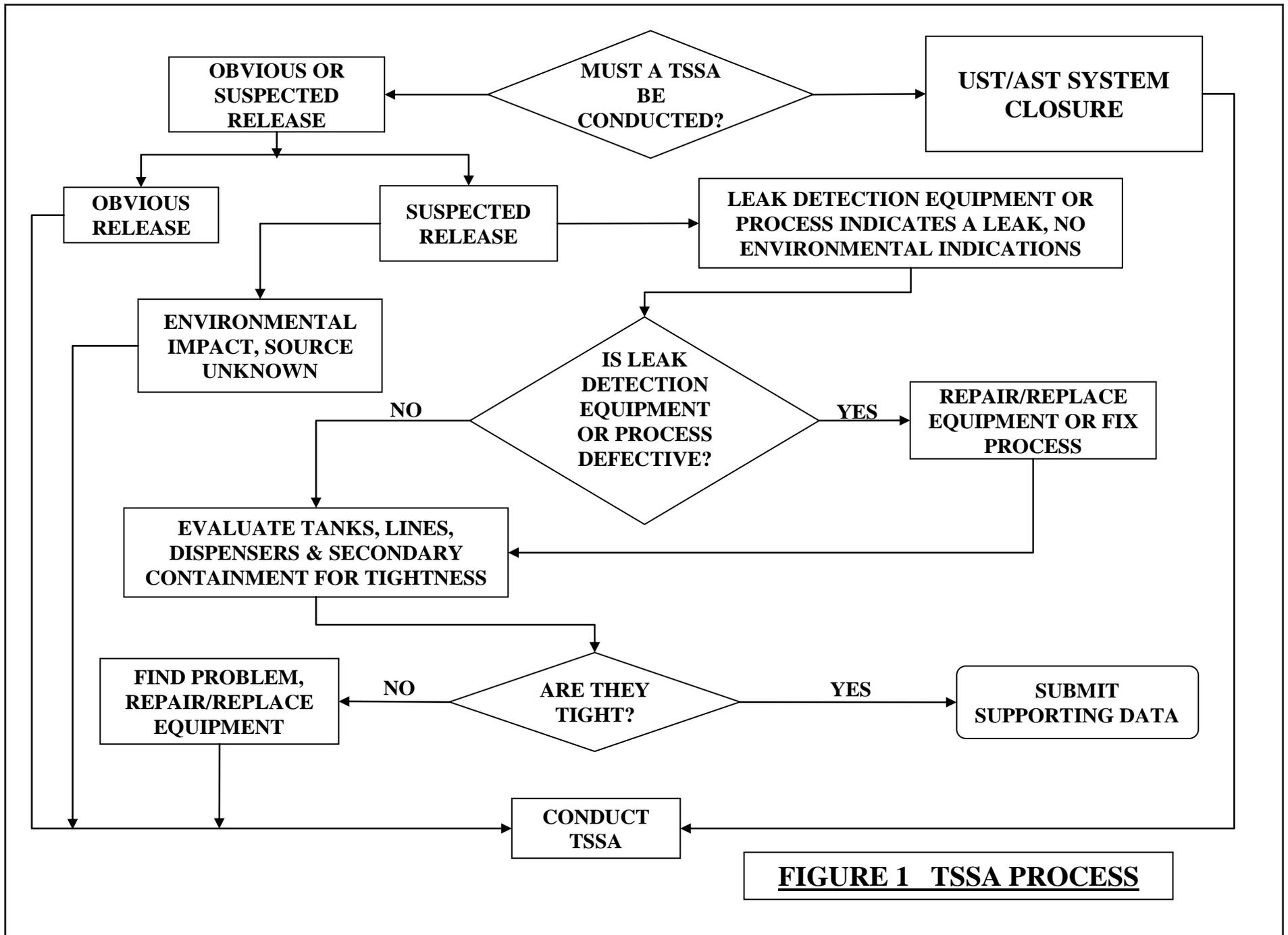


FIGURE 1 TSSA PROCESS

D) WHO SHOULD USE THIS PUBLICATION?

Environmental professionals seeking Commerce ERS release assessment and reporting information, such as registered Tank Specialty Firms, Tank-System Site Assessors, and Tank System Removers and Cleaners. The publication should also help owners and operators, as well as their environmental consultant, to understand and oversee release-assessment activities conducted at their storage tank sites, should it become necessary.

II) PROGRAM OVERVIEW AND APPLICABILITY

A) OVERVIEW

The Petroleum Products and Tanks Bureau within the Commerce ERS Division is responsible for the administration and regulation of UST and AST systems in Wisconsin. This is accomplished through the administrative and technical standards contained in Wisconsin Administrative Code chapter Comm 10. The Bureau's administrative and regulatory functions include:

- 1) Technical code and standards consultation for chapter Comm 10.
- 2) Permitting and registration of aboveground and underground flammable, combustible and hazardous liquid storage tank systems.
- 3) Retail service station inspection and petroleum product testing.
- 4) Maintenance of a statewide aboveground and underground storage tank database.
- 5) Review of system design plans for storage or dispensing system installation, modification or upgrade.
- 6) Credential administration for individuals working in specialties requiring certification.
- 7) Administration of the Comm 10 Local Program Operator program.

Comm 10.580 (3) states that when an assessment of an underground tank-system site is required, the owner or operator must have a certified tank-system site assessor document field observations and sample for the presence of a release wherever contamination is identified or is most likely to be present at the tank site. If the assessor discovers obvious contamination, he or she must complete the appropriate assessment sampling – such as for the entire system; or for only the tank, or piping, or sumps, or dispensers – and complete the documentation and reporting in its entirety. All sampling, documentation and reporting under this code section must be in a format prescribed by the Department.

Comm 10.465 (1) states that TSSAs for aboveground storage tanks must comply with the requirements of section Comm 10.580. It further states that assessment of aboveground storage tank systems must include evaluation of any underground piping, the loading rack or transfer area, and the area under each tank.

Comm 10.180 states that for violations of the rules of chapter Comm 10, penalties are assessed in accordance with section 101.09 (5) of the Wisconsin Statutes, as follows, and apply separately to each tank that is in violation of chapter Comm 10.

"Any person who violates this section or any rule or order adopted under this section shall forfeit not less than \$10, nor more than \$5,000 for each violation. Each violation of this section or any rule or order under this section constitutes a separate offense and each day of continued violation is a separate offense."

Comm 10.180 further notes that section 40 CFR 281.41 allows the US EPA to assess fines of up to \$5,000 or more for each tank, for each day of violation.

B) APPLICABILITY

In general, Comm 10 requires that a TSSA be performed at the time a storage tank system or some component thereof is to be upgraded or repaired or to undergo a change in service to store a non-regulated substance – and there is a suspected or obvious release. A TSSA is also required when a tank system or some component thereof is to be removed from service. In this situation, there may be no suspected or obvious release initially.¹

A TSSA is not required for the following tank systems or components thereof unless there is a suspected or obvious release:

- 1) Tanks which have a capacity of less than 4,000 gallons and which stored heating oil for consumptive use on the premises where stored.
- 2) Tanks located at a private residence or on a farm premises, which have a capacity of less than 1,100 gallons, and which stored fuel for dispensing into motorized vehicles.
- 3) The closure of double wall pipe when modification or upgrading is conducted on a system that will remain in operation, unless the piping is to be abandoned in-place.
- 4) Where an entire underground tank system, including the connections at the tank and dispensers, has been placed in liquid-tight secondary containment for the entire life of the system.
- 5) Aboveground storage tanks or underground piping that have been placed in secondary containment complying with section Comm 10.420 (2) (d), (e) or (g) for their entire operational life.
- 6) Loading racks or transfer areas that have been placed in secondary containment complying with section Comm 10.420 (5) for their entire operational life.
- 7) Aboveground storage tanks with a capacity of under 5,000 gallons.

Conditions are variable and typically complex at sites where an investigation and cleanup is ongoing or has taken place and the “closure” allows for some level of contamination to remain in place. The need for a TSSA at these sites will be determined on a case-by-case basis due to their complex nature. The Department of Commerce must be contacted for these sites prior to performing any activities that may require a TSSA.

C) CERTIFICATION REQUIREMENTS AND ENFORCEMENT FOR TANK-SYSTEM SITE ASSESSORS

Comm 5.83 (1) (a) states that no person may conduct a TSSA required under chapter Comm 10 unless the person holds a certification issued by the Department as a certified Tank-System Site Assessor.

Comm 5.83 (1) (b) further declares that tank-system site assessments are not to be performed by a person, even though they might be certified, with a personal or monetary interest in the facility or whose employer has a personal or monetary interest in the facility.

¹ Note: The definition of a “tank system” in Comm 10 includes all associated piping. A separate assessment is required for other system components if they are removed from service or upgraded at a time different from that of the UST.

Note: Comm 10 allows closure in-place only in a limited number of situations. Permission must be obtained from the Department.

Penalties for violations of chapter Comm 5 will be assessed in accordance with section 101.09 (5) of the Statutes.²

D) WHERE TO OBTAIN ADDITIONAL INFORMATION

Information on contractor certification may be obtained from:

The Department of Commerce
Environmental and Regulatory Services Division
Bureau of Petroleum Products and Tanks
P.O. Box 7838
Madison, WI 53707-7838
(608) 266-7874
FAX (608) 261-7725

III) TSSA PROCEDURES

A) PRE-ASSESSMENT STEPS

1) Check Local Ordinances

Always check for a local ordinance that may govern tank system closure. Comm 10 specifies minimum statewide standards, and local governments may have requirements that are more restrictive.

2) Contact Program Operators

(State, LPO). For Local Program Operator (LPO) jurisdictions, see the following Web site: http://commerce.wi.gov/php/er-lpolists/lpo_agency_list.php. For LPO contact information, see http://commerce.wi.gov/php/er-lpolists/lpo_contacts_list.php.

B) SUSPECTED AND OBVIOUS RELEASES

According to chapter Comm 10, a suspected release occurs where (1) there is an indication of a release, but there is no environmental evidence; or (2) there is environmental evidence, but the source is unknown. An obvious release is where there is both environmental evidence and a known source.

1) Evidence

(a) Suspected Release

A release is considered suspected when one or more of the following occur:

- i. A tank system exhibits unusual operating conditions (for example, erratic dispenser behavior, sudden loss of product, or appearance of water in tank).
- ii. Release detection monitoring triggers an alarm, or otherwise indicates a problem.
- iii. There is direct visual or olfactory observation of released product into the environment – for example, a sheen is visible on surface water; product or vapors are found in a utility conduit; free-phase liquid is discovered in observation wells, the tank bed, or in other portions of the storage tank system; or analytical results of samples collected during a TSSA or routine real estate transfer assessment (Phase II ESA) show the presence of contamination, but the contaminant source is unknown.

² "Any person who violates this section or any rule or order adopted under this section shall forfeit not less than \$10 nor more than \$5,000 for each violation. Each violation of this section or any rule or order under this section constitutes a separate offense and each day of continued violation is a separate offense." Note: Section 40 CFR 281.41 allows the US EPA to assess fines of up to \$5,000 or more for each tank for each day of violation.

- iv. Inventory verification records indicate an unexplained loss of tank contents.
- (b) Obvious Release

A release is considered obvious when *both* of the following conditions exist:

- i. Environmental contamination is present, and
- ii. The source of the contamination is known.

Examples of obvious releases include finding environmental contamination in the course of investigating a suspected release, identifying the unknown source of a previously discovered release, or confirming a tank-system failure.

2) Action Required

(a) Suspected Release

Assessment activities should consist of making visual and olfactory observations; taking photos of impacted soils, free-phase liquid, and trench and tank-bed excavations (all side walls and floor); evaluating for vapors using a field vapor-sampling device, such as a photo ionization detector (PID) or a flame ionization detector (FID); and conducting environmental sampling. Sampling procedures are presented below.

If you find environmental contamination at any step in the assessment of a suspected release, or if you determine the source of a previously discovered release, then the suspected release becomes an obvious release. More on obvious releases follows.

(b) Obvious Release

Unless directed otherwise by the Department, owners and operators must report obvious releases to the DNR immediately. (See page 32 for further information about reporting.)

3) Sampling

(a) Quality and Representative Samples

The importance of collecting samples that are representative of site conditions cannot be overstated. Since flammable, combustible or federally regulated hazardous substances consist largely of volatile organic compounds (VOCs), special care in collecting samples is required. Soil samples collected during the TSSA process must be analyzed for the following analytical parameters:

Gasoline/Diesel/Waste Oil/Kerosene/Fuel Oil

Gasoline Range Organics (GRO)

Diesel Range Organics (DRO)

Petroleum Volatile Organic Compounds (PVOCs), and

Naphthalene

For other hazardous substances, including, but not limited to, E-85 and biofuels, contact the Department.

(b) Compositing

Because compositing of samples in the field does not yield sample results that are representative of site conditions, **sample compositing is not allowed for release determination**. Only discrete grab samples are acceptable for this purpose.

(c) When and Where to Collect Soil Samples³

In general, one must always collect samples from native soil. **All backfill materials must be removed from an excavation prior to sampling**. Samples must be collected from both the floor and sidewalls of an excavation. More specifically, from native soil that remains in the floor or sidewalls of the excavation and which appears to be the most contaminated or the most likely to be contaminated. All samples must be collected from a minimum depth of twelve (12) inches into the floor or sidewall as soon as possible after the native soil is exposed to the atmosphere. This procedure will minimize loss of contaminants through volatilization into the atmosphere. Compositing of samples (including sampling of the backfill) is not permitted. Each sample that is collected must be analyzed separately.

(Note: The Department does not consider groundwater in an excavation to be relevant to the release determination process at this point; therefore, groundwater sampling is not required during the TSSA process)

If, for safety reasons, a backhoe is used to collect soil samples, the above sampling criteria must still be followed. Immediately upon removal from the excavation, discrete grab samples must be collected from 12 inches into the unexposed soil in the backhoe bucket.

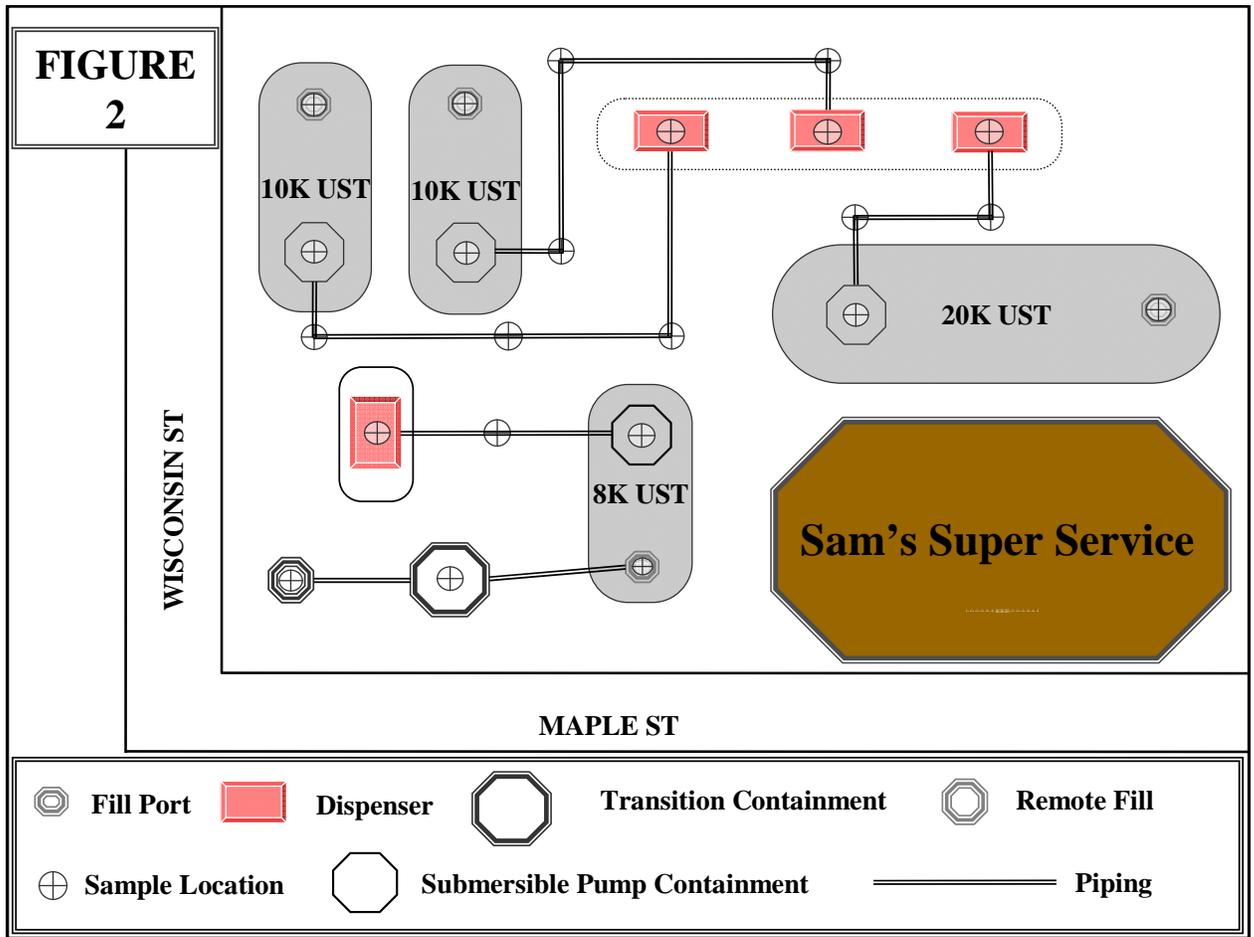
In selecting sample types, locations, and analytical testing methods, consider the nature of the stored substance, the type of initial release detection alarm or cause for suspicion (if any), the composition of the native soils, depth to groundwater, and any other factors appropriate for identifying the presence and source of a release. Because a tank system can fail at any point, the entire system – fill port, transition containment units, tanks, piping runs, secondary containment units for submersible pumps or dispensers, or dispensers – must be assessed.

Always give preference to collecting discrete grab samples of soil in areas where:

- There are obvious visual, olfactory, or field-instrument indications that contamination is present, or
- If contamination is not so obvious – collect samples from locations where releases are most likely to have taken place, such as around tank fill ports, submersible pump containment units, and areas of corrosion; at pipe joints; and beneath dispensers or transition containment units which may have failed due to corrosion holes, cracks or failed grommets at conduit pass-through openings.

Examples of typical sample locations at a facility are shown in Figure 2.

³ The locations given in this publication are primarily for UST systems; however, the same general locations can be used for routine AST system removals and routine environmental site assessments (ESAs). Always give priority to sampling in areas displaying obvious visual, olfactory, or field-instrument indications of contamination.



IV) SAMPLING VARIATIONS

A) TANK BED (FLOOR AND SIDEWALLS)

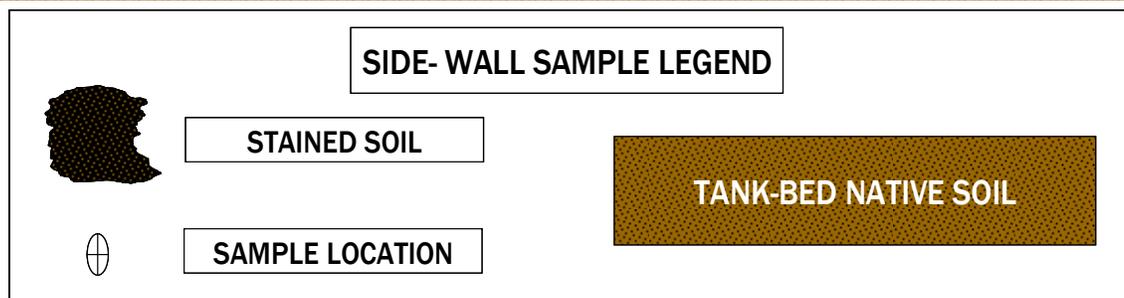
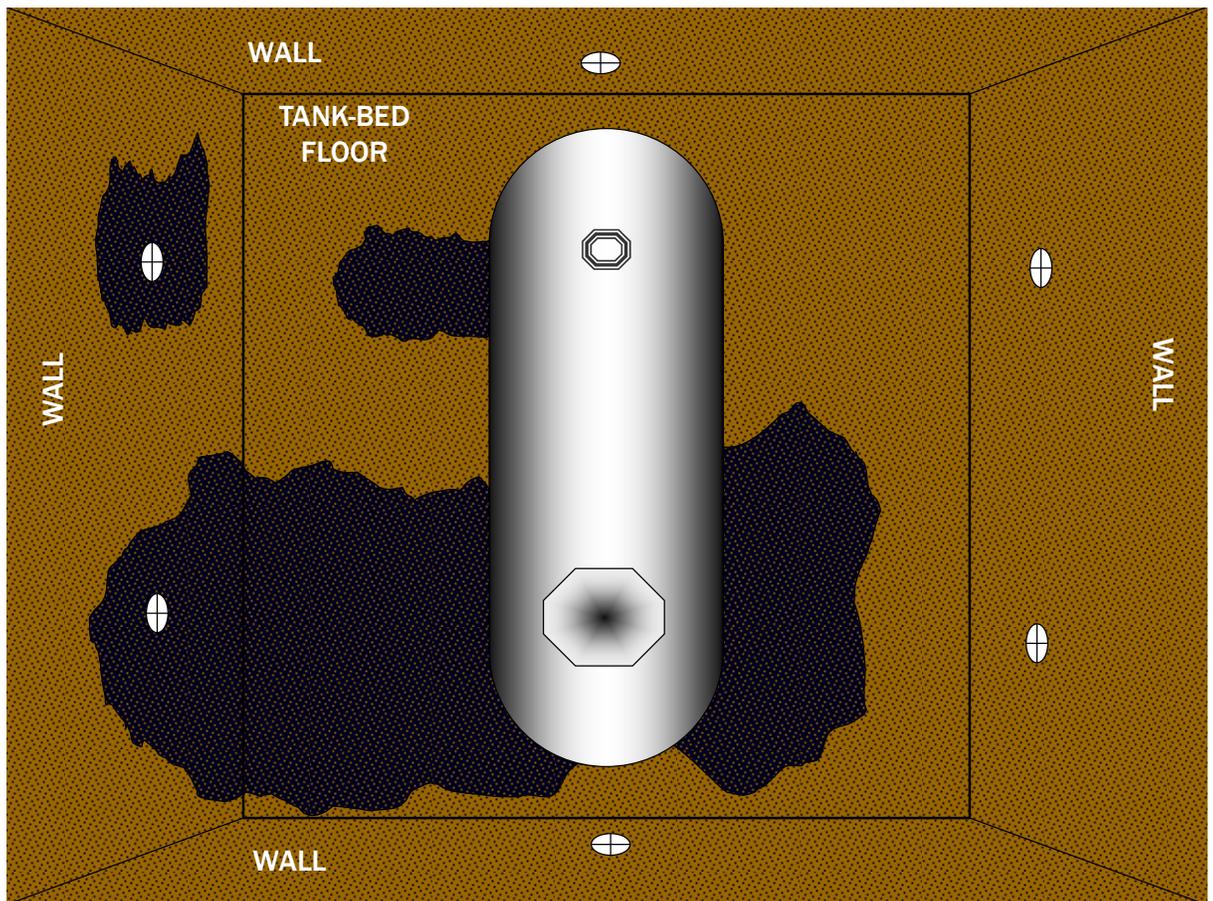
Tank-bed sample locations and number depend upon the size (length) and number of tanks in the system, their proximity to one another, and whether encumbrances such as groundwater, bedrock or a concrete slab are present. Always take photographs of the tank bed and indicate where samples were collected in the TSSA report. These should include the excavated tank bed and pipe line and dispenser trenching, as well as examples of both contaminated and uncontaminated areas.

The following diagrams illustrate the recommended sampling locations for tanks of various sizes and number, and various encumbrances. The sample locations that are shown between tanks are for tanks which are spaced no more than 5 feet apart. For wider spacing between tanks, the samples between the tanks are to be taken adjacent to each tank.

1) SIDE WALL SAMPLING

Samples of native soil are to be collected, at a minimum, from 12 inches into the wall of the tank bed. There must be at least 1 sample collected from each 10-foot horizontal segment of wall. Use the following sample-collection protocol:

1. Collect samples from the most obvious, highly contaminated soil – to the least obvious, least contaminated soil.
2. If there are no areas of obvious contamination, then collect soil from areas that are adjacent to tank-system components from which a release would have been most likely to occur (e.g., fill port, submersible pump containment, pipe joints).



2) NO ENCUMBRANCES

Samples of native soil are to be collected from approximately 1 foot into the floor of the tank bed (see diagrams below for details).

(a) Single Tank

Length of Tank

≤ 5 feet

> 5 feet up to and including 20 feet

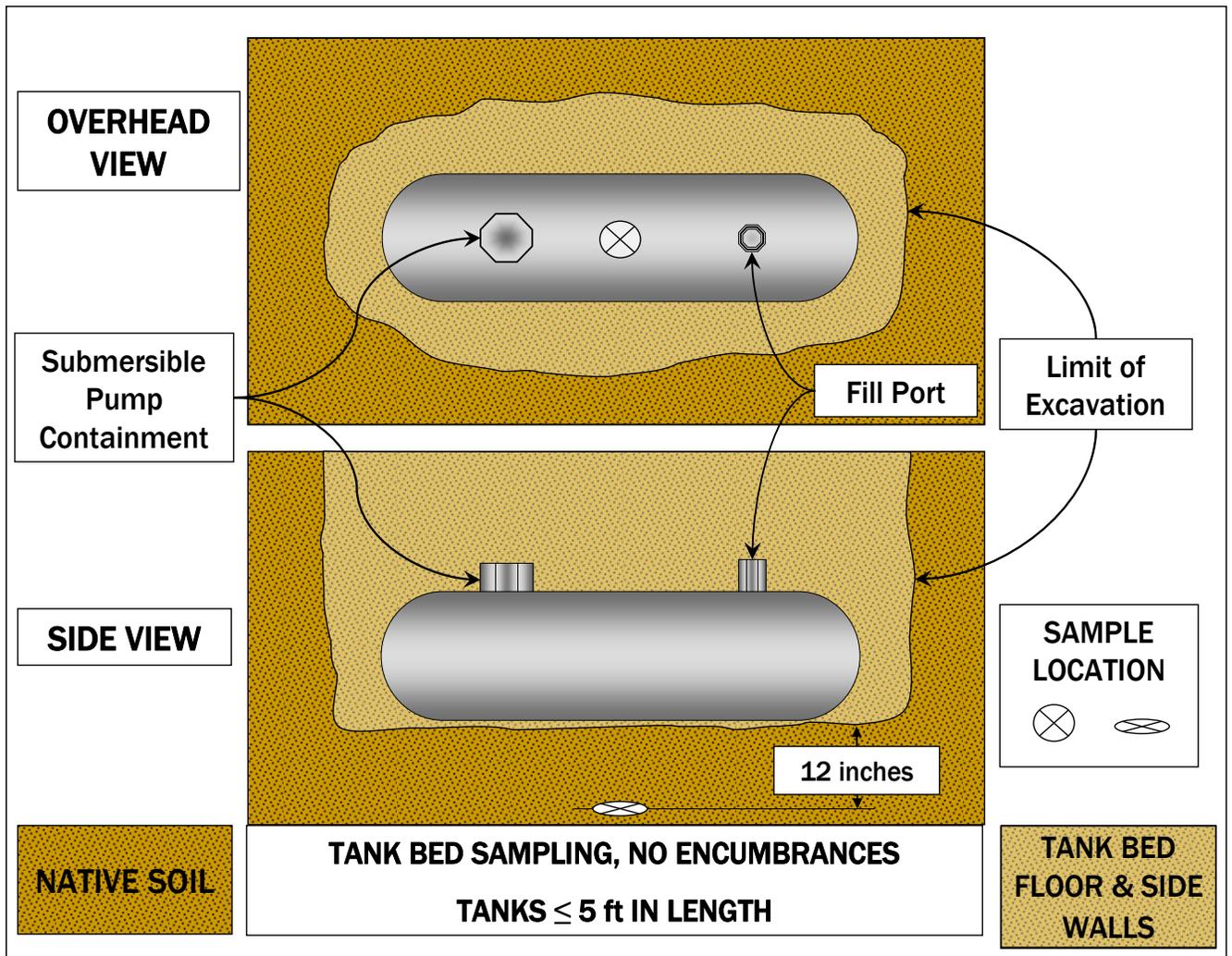
>20 feet

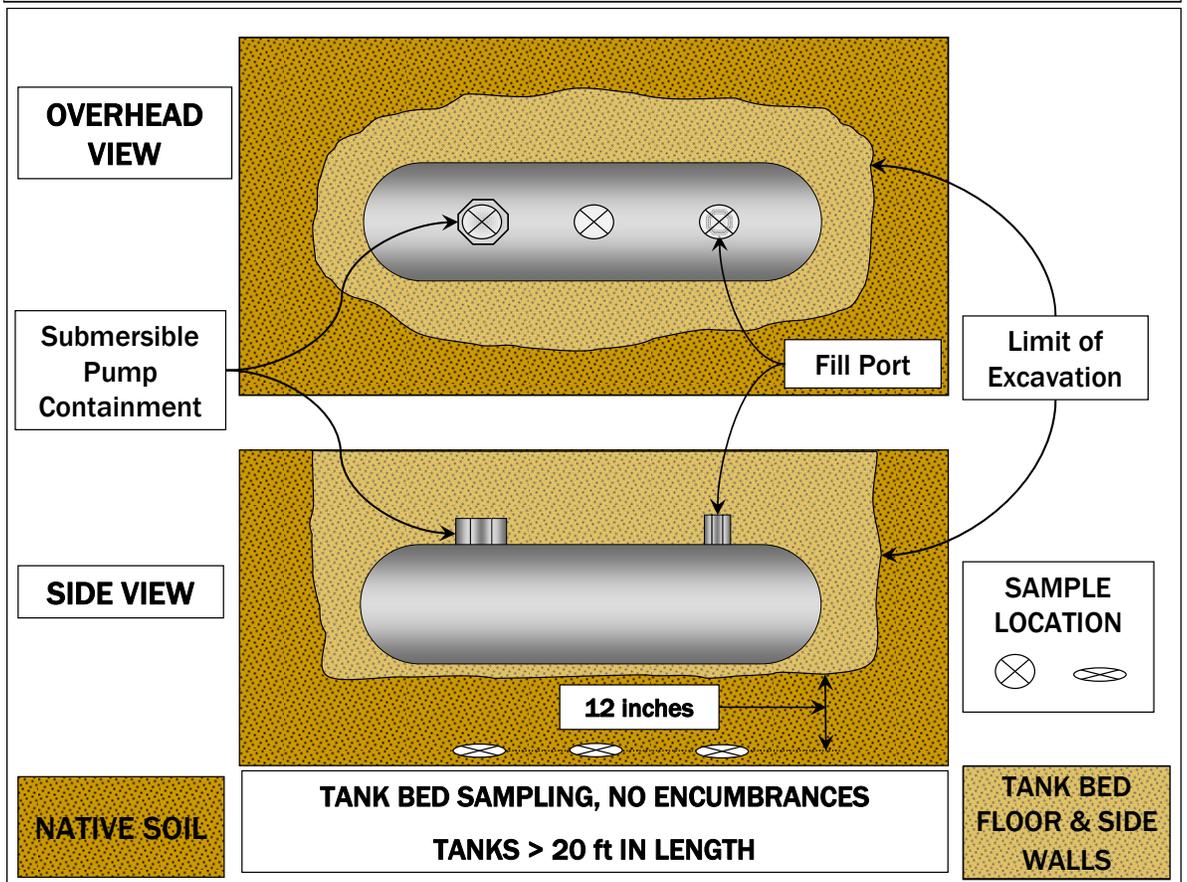
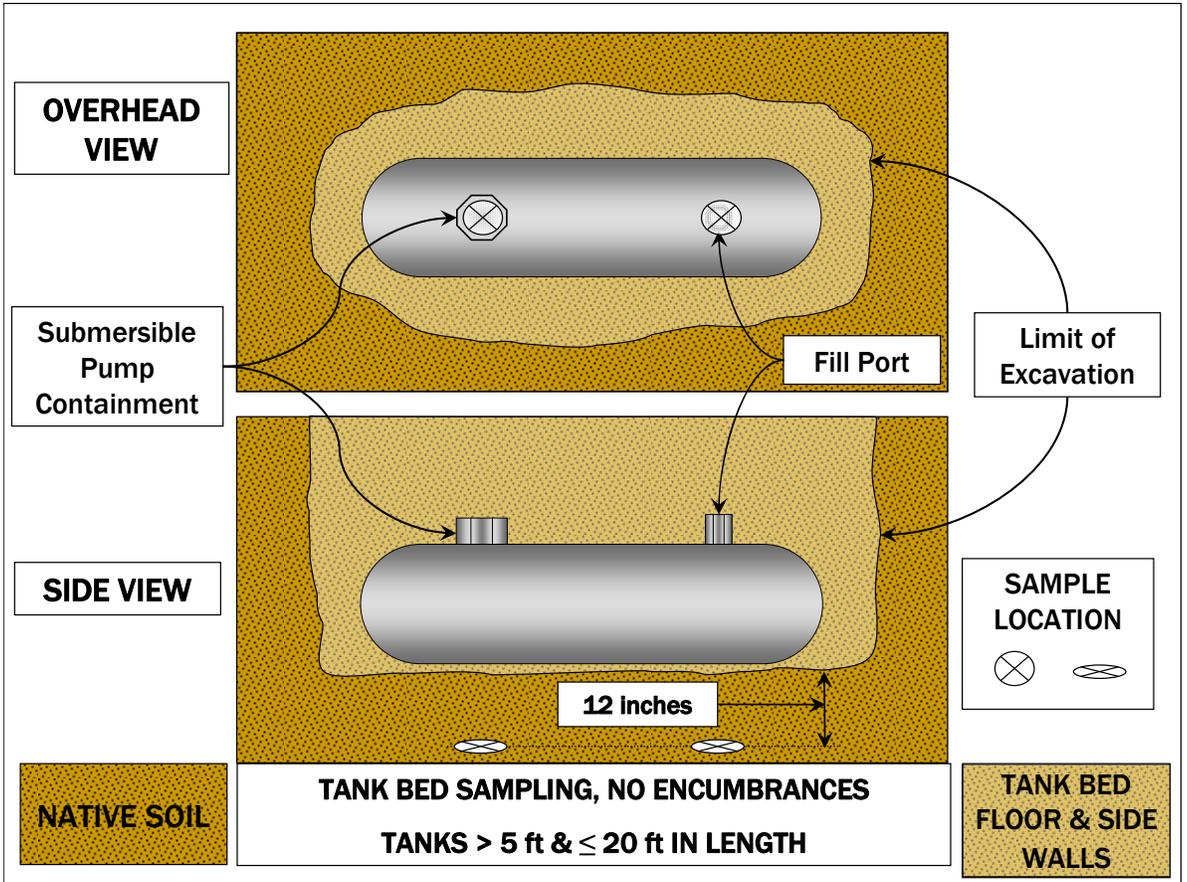
Minimum Number of Soil Samples Per Tank

1 sample under middle of tank.

2 samples: 1 under each end of tank and in-line with the fill port and pump containment.

3 samples: 1 under each end of tank and 1 in-line with the fill port. (If fill port is within 3 feet of tank end, collect third sample beneath mid-region of tank.)





(b) Multiple Tanks

Length of Tank

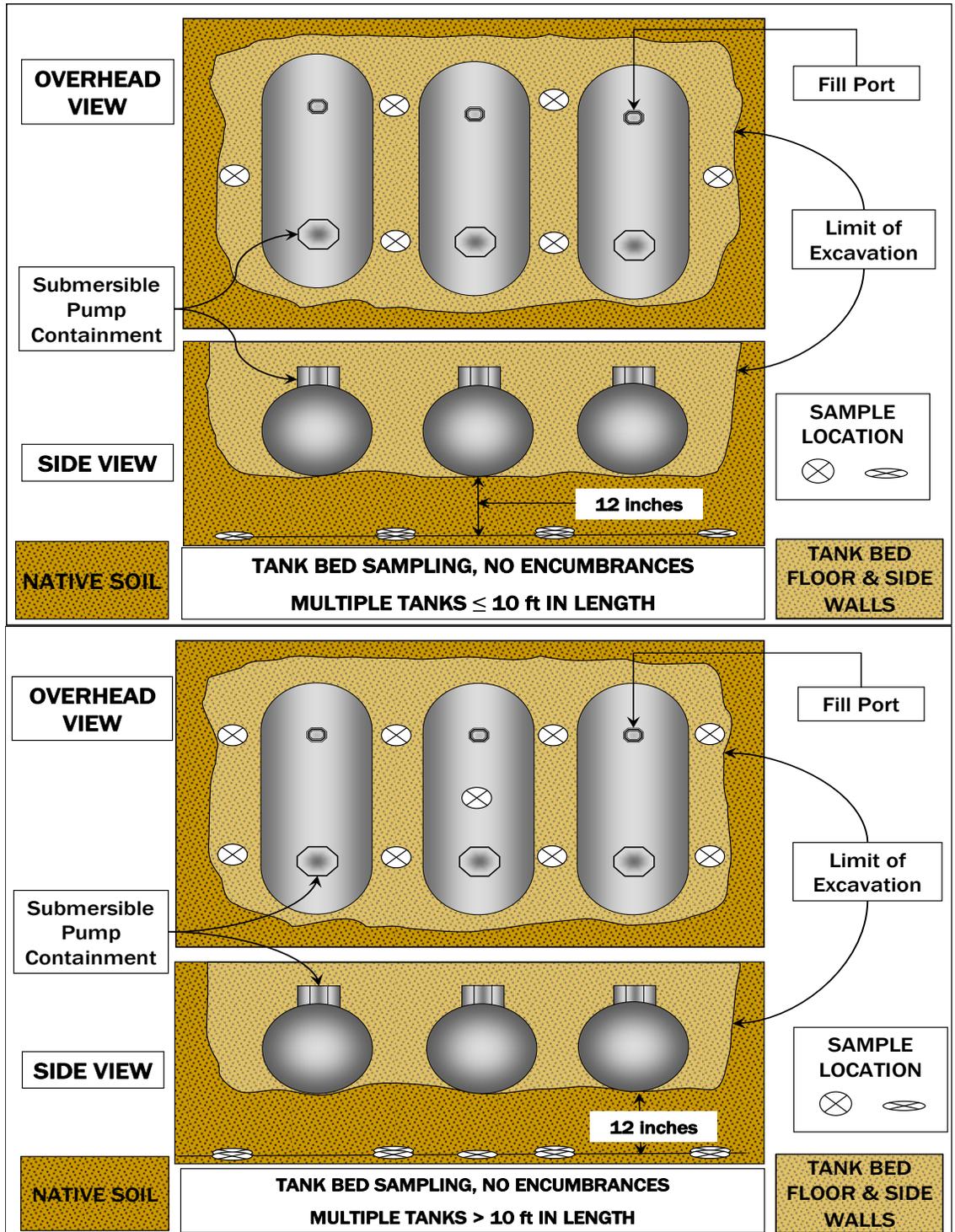
≤ 10 feet

>10 feet

Minimum Number of Soil Samples Per Tank Bed

6 samples: 2 between each tank – 1 in line with the pump containment and 1 in line with the fill port; 1 off the side of each of the outermost tanks – mid-region of the tank.

9 samples: 2 off the side of the outermost tanks – 1 in line with the pump containment and 1 in line with the fill port; 2 between each tank – 1 in line with the pump containment and 1 in line with the fill port; and 1 beneath the center of the innermost tank(s).



3) BEDROCK PRESENT

Every effort should be made to collect samples from native material (soil and/or weathered bedrock) from both the floor and walls of the tank bed. However, if the floor of the tank bed consists only of competent bedrock (i.e., there is no native material on top of the bedrock) then all samples will have to be collected from the sidewalls of the tank bed. These samples must be collected from a point that is at least 12” into the sidewall and as close to the soil-bedrock interface as possible.

If the exposed bedrock is weathered and friable or if there is some native soil on top of the bedrock, first try to obtain samples of native material from both the floor and walls of the tank bed. Include in the TSSA report the depth below ground surface from which samples were collected, and describe the type of and condition of the bedrock (geology, degree and extent of weathering, etc.) and the number, orientation, width and length of any bedrock fractures that are present.

(a) Single Tank

Length of Tank

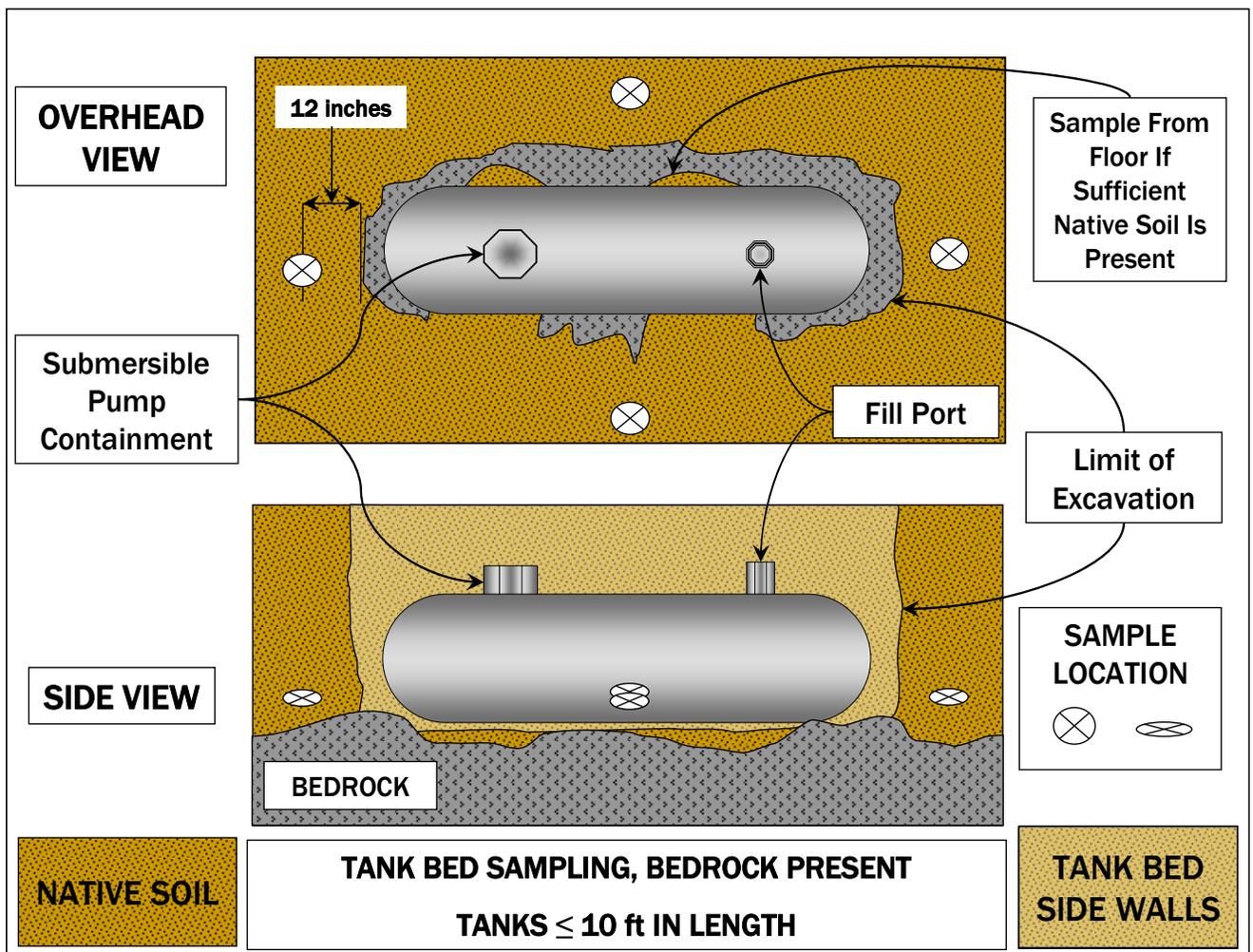
≤ 10 feet

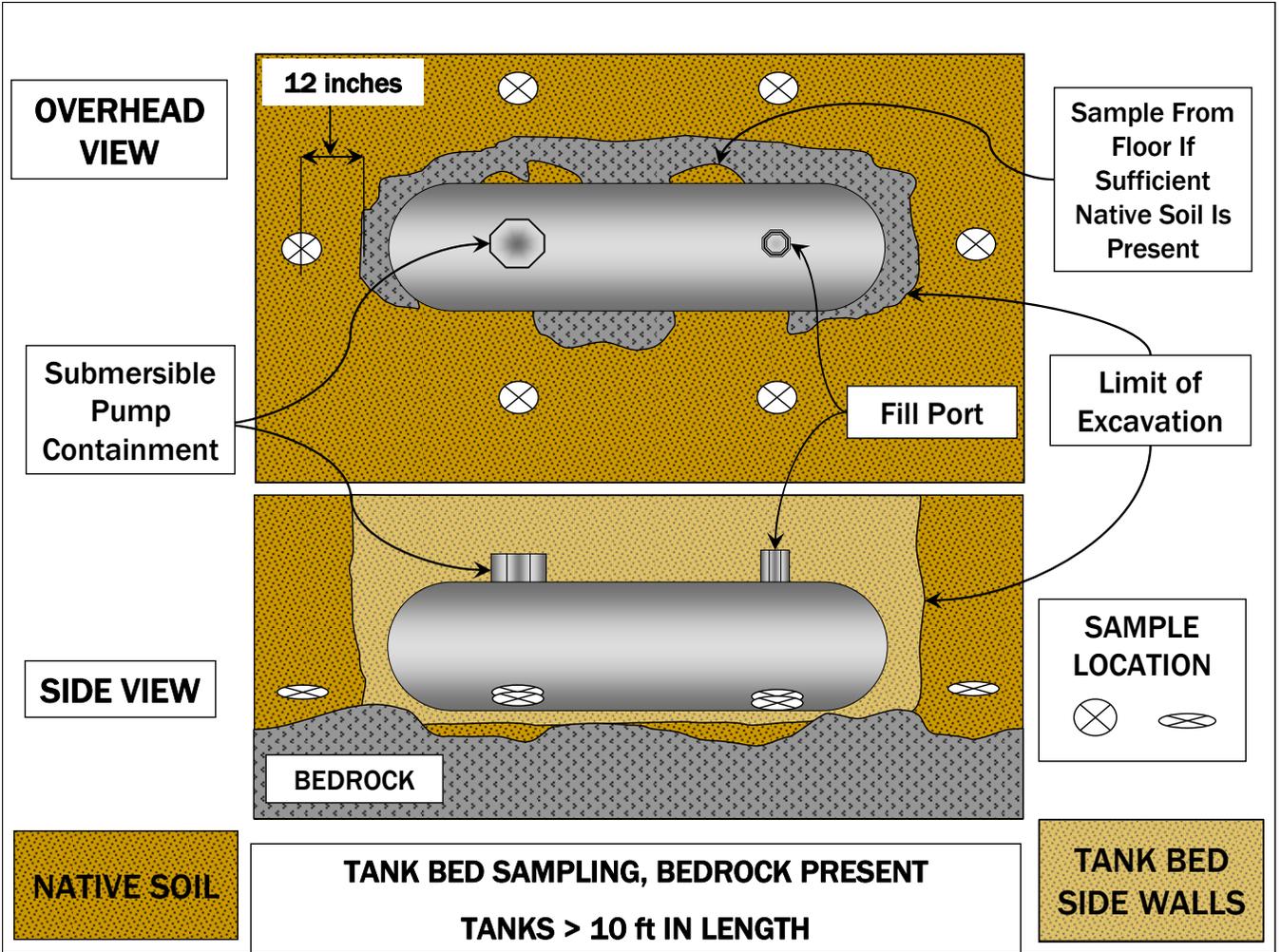
>10 feet

Minimum Number of Soil Samples Per Tank

4 samples: 1 at end of each tank and 1 off each side of the tank – mid-region.

6 samples: 2 off each side of the tank – 1 in line with the pump containment and 1 in line with the fill port; and 1 off each end of the tank. (If the fill port is within 3 feet of tank end, then collect the 2 side fill port samples from mid-region of the tank.)





(b) Multiple Tanks

Length of Tank

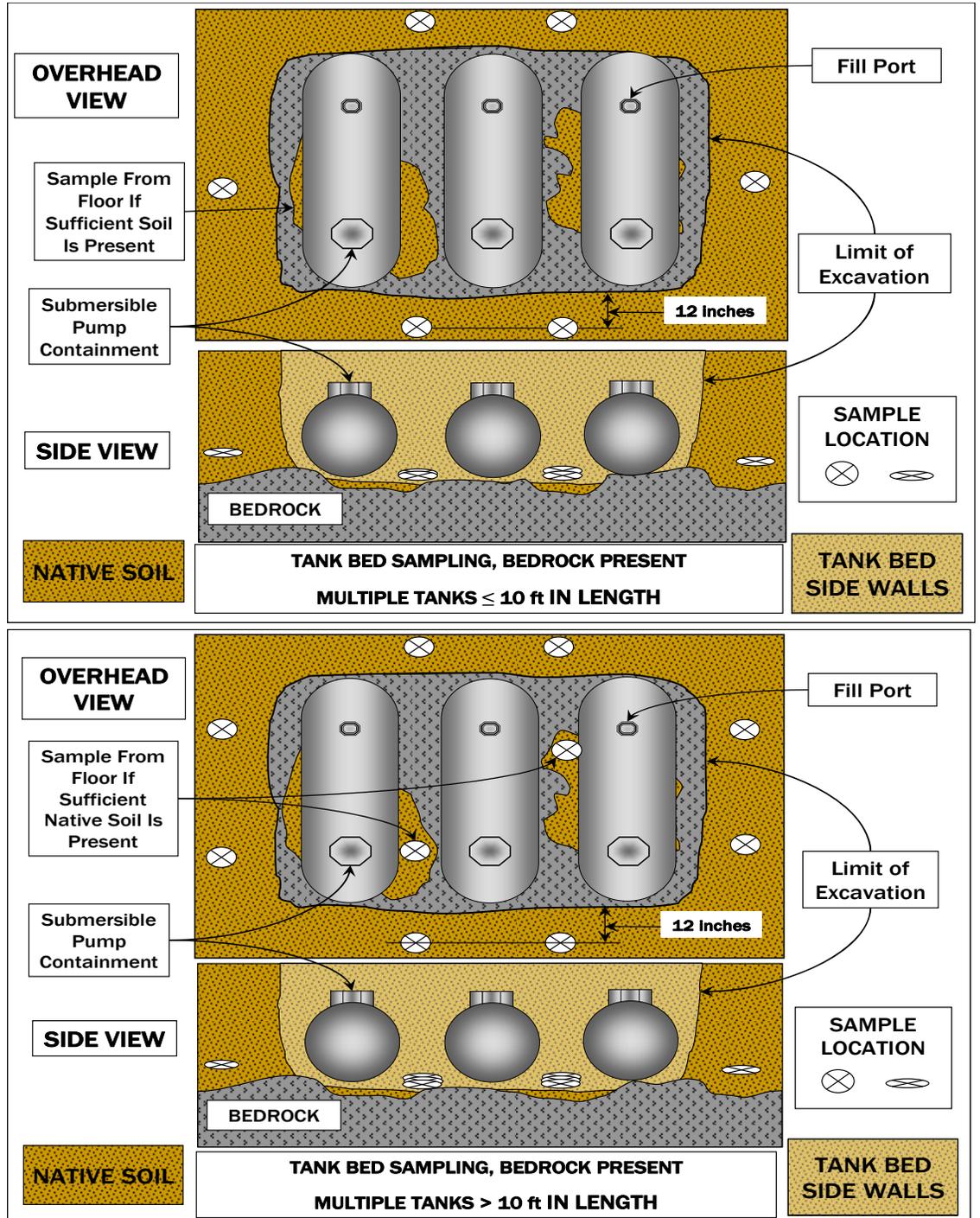
≤ 10 feet

>10 feet

Minimum Number of Soil Samples Per Tank Bed

6 samples: 1 off the side of each of the outermost tanks – mid-region of the tank, and 2 in line with each gap between tanks.

10 samples: 2 off the side of each of the outermost tanks – 1 in line with the pump containment and 1 in line with the fill port; 3 in the gap between each set of tanks – 1 mid-region and 1 at each end of the tanks. (If fill port is within 3 feet of tank end, then collect the side fill port samples from mid-region of the tank.)



4) CONCRETE SLABS OR “DEADMAN” ANCHORS ARE PRESENT

Samples of native soils are to be collected at the edges of the slab or anchor, at locations based on the number and length of the tanks (see diagrams below).

(a) Single Tank

Length of Tank

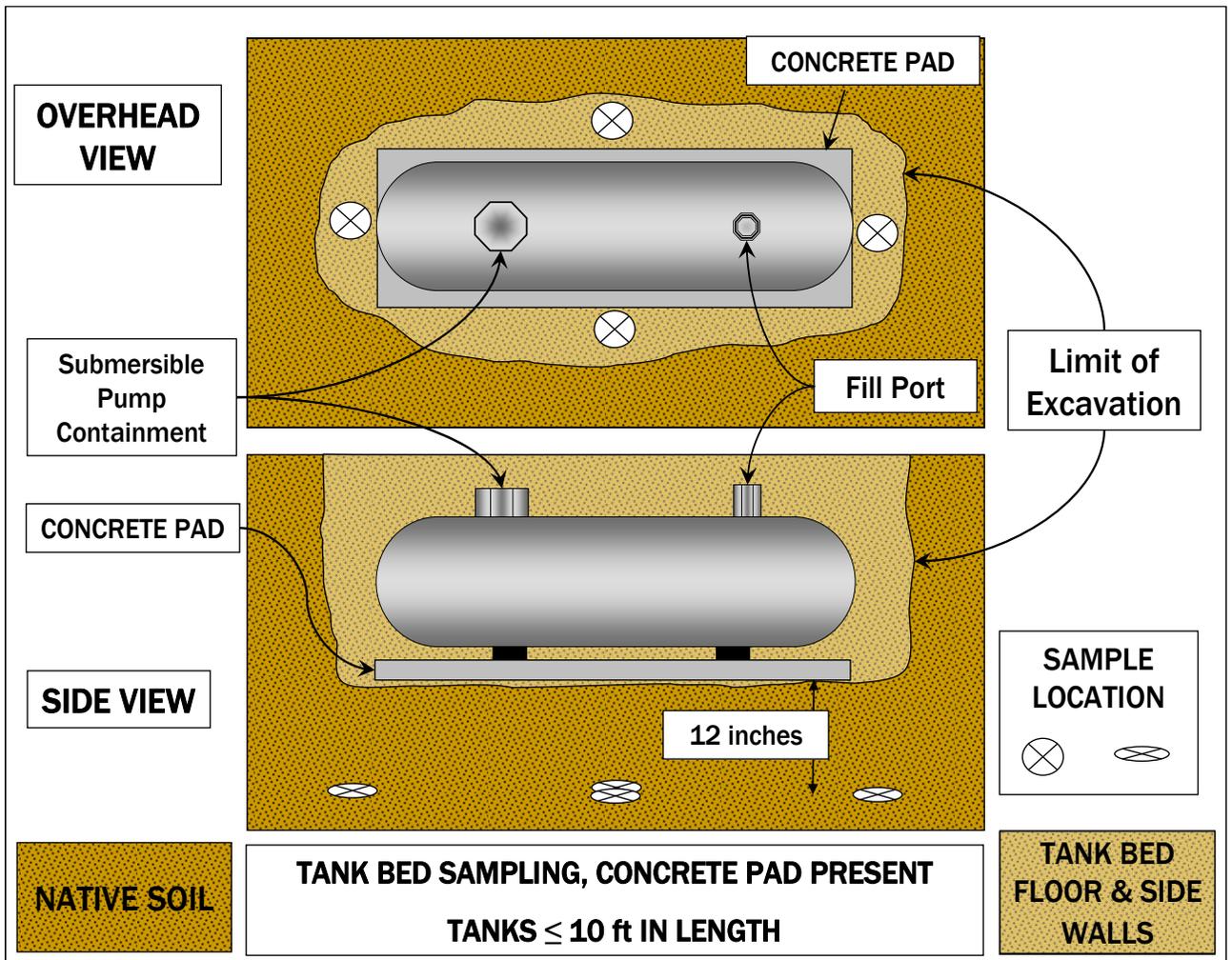
≤ 10 feet

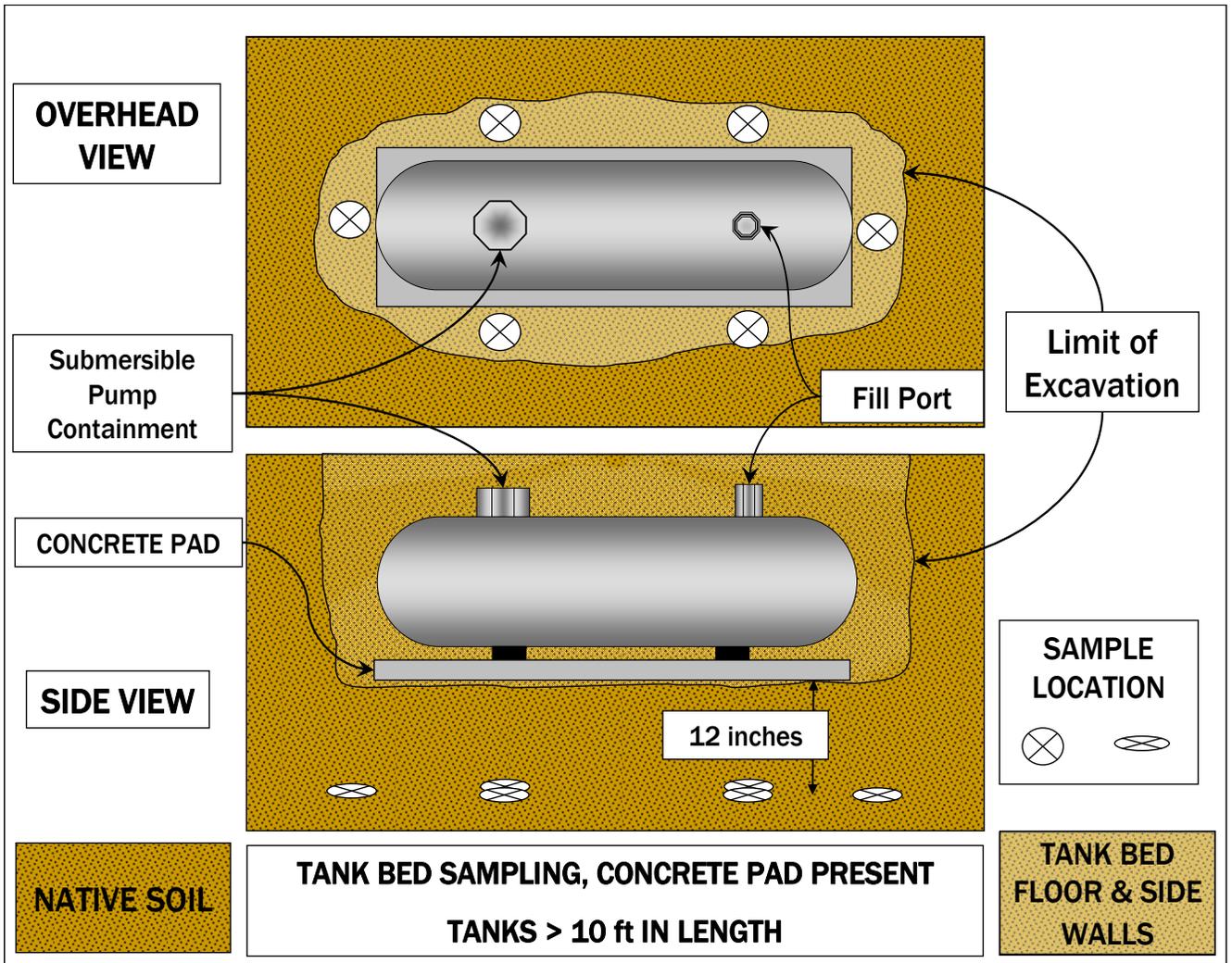
>10 feet

Minimum Number of Soil Samples Per Tank

4 samples: 1 at end of each tank and 1 off each side of tank – mid-region.

6 samples: 2 off each side of the tank – 1 in line with the pump containment and 1 in line with the fill port; and 1 off each end of the tank. (If the fill port is within 3 feet of tank end, then collect the 2 side fill port samples from mid-region of the tank.)





(b) Multiple Tanks

Length of Tank

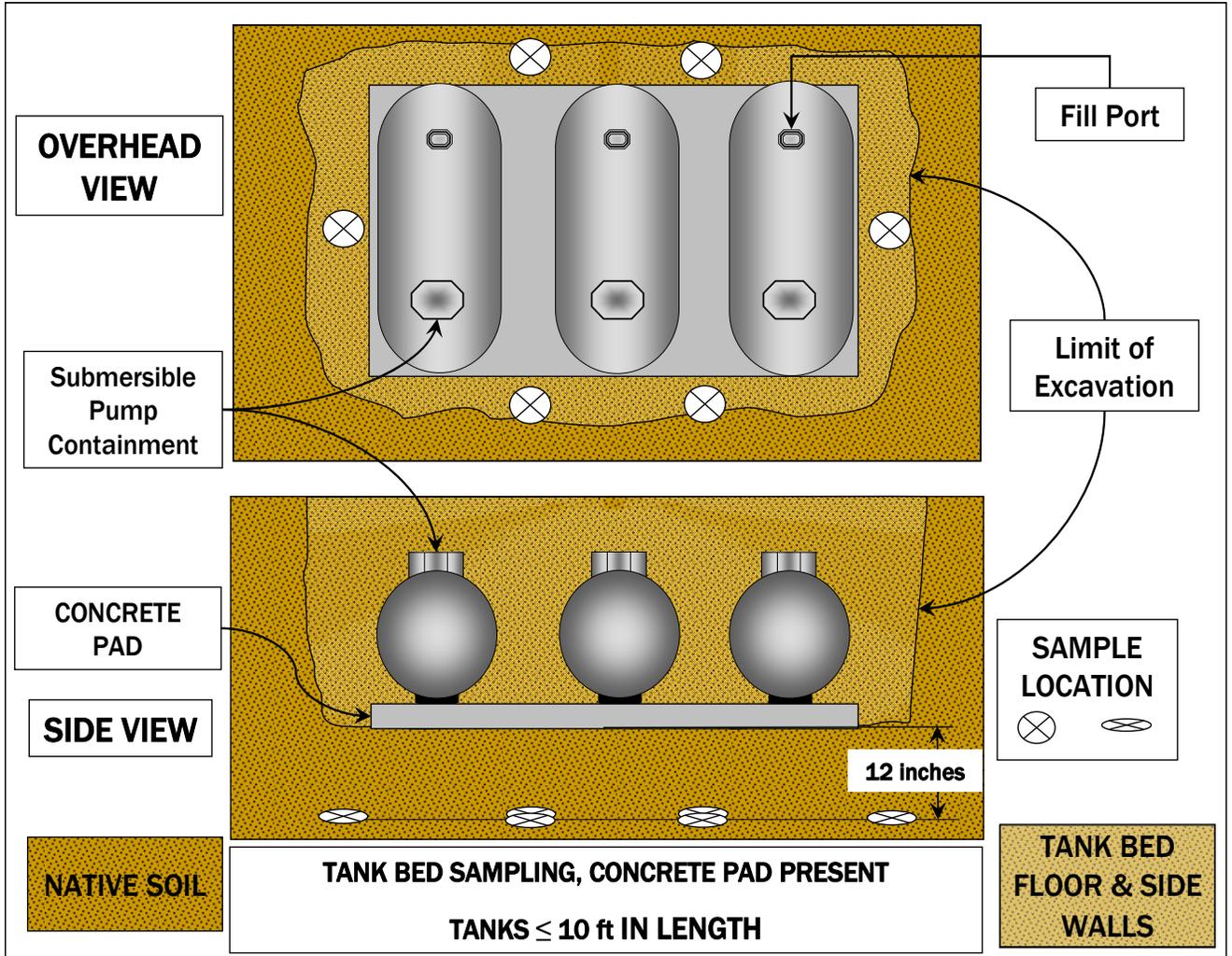
≤ 10 feet

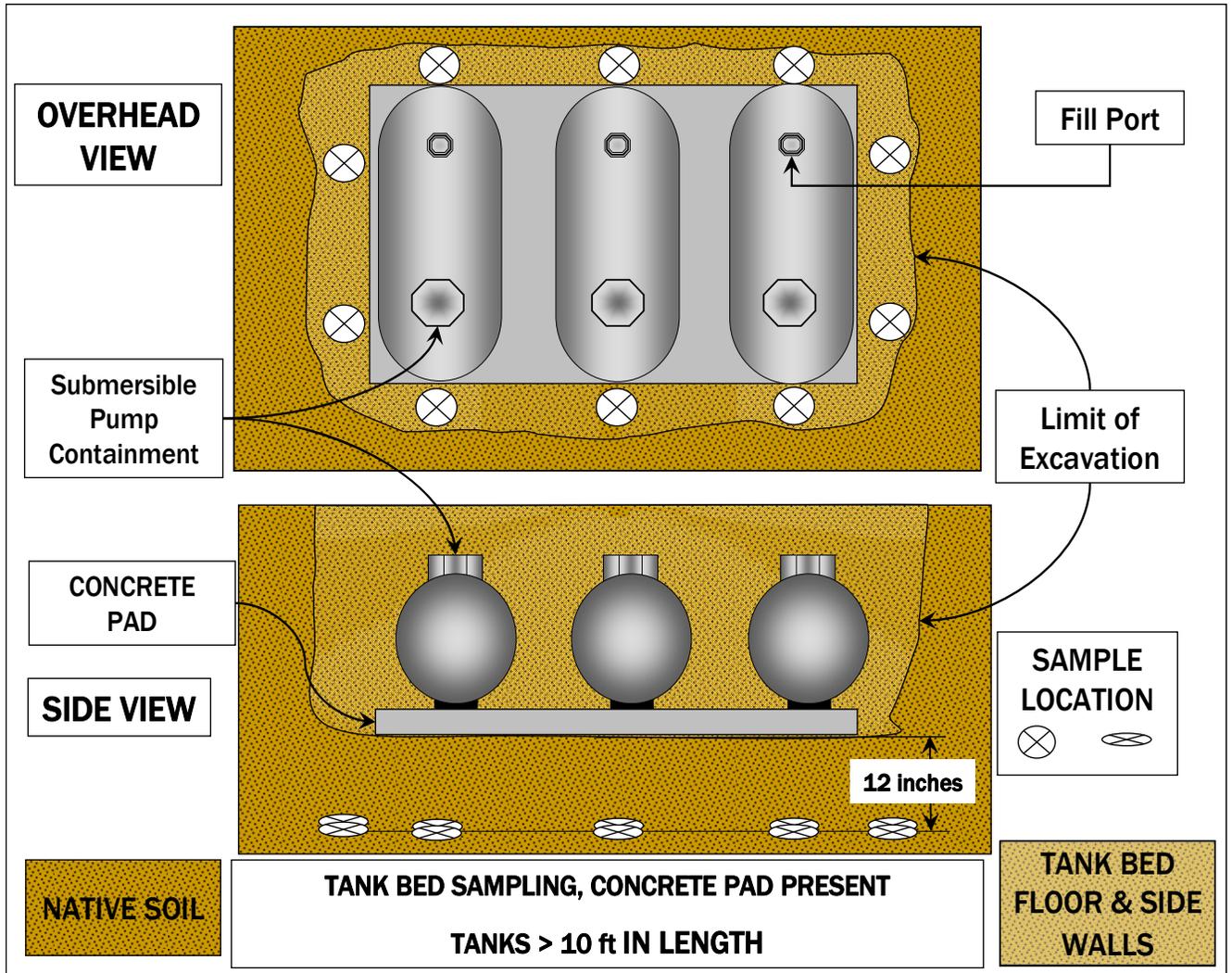
>10 feet

Minimum Number of Soil Samples Per Tank Bed

6 samples: 1 at end of each set of tanks in line with the gap between each set of tanks; and 1 off the side of each of the outermost tanks – mid-region of the tank.

10 samples: 2 off the side of the outermost tanks – 1 in line with the pump containment and 1 in line with the fill port; and 1 at the end of each tank. (If fill port is within 3 feet of tank end, then collect the side fill port samples from the mid-region of the tank.)





5) GROUNDWATER IS PRESENT

If water is present in the tank bed, collect soil samples from immediately above the soil-water interface, 1 foot into the sidewall, in numbers according to the diagrams below. Note in the TSSA report the depth below ground surface from which the sidewall samples were collected.

(a) Single Tank

Length of Tank

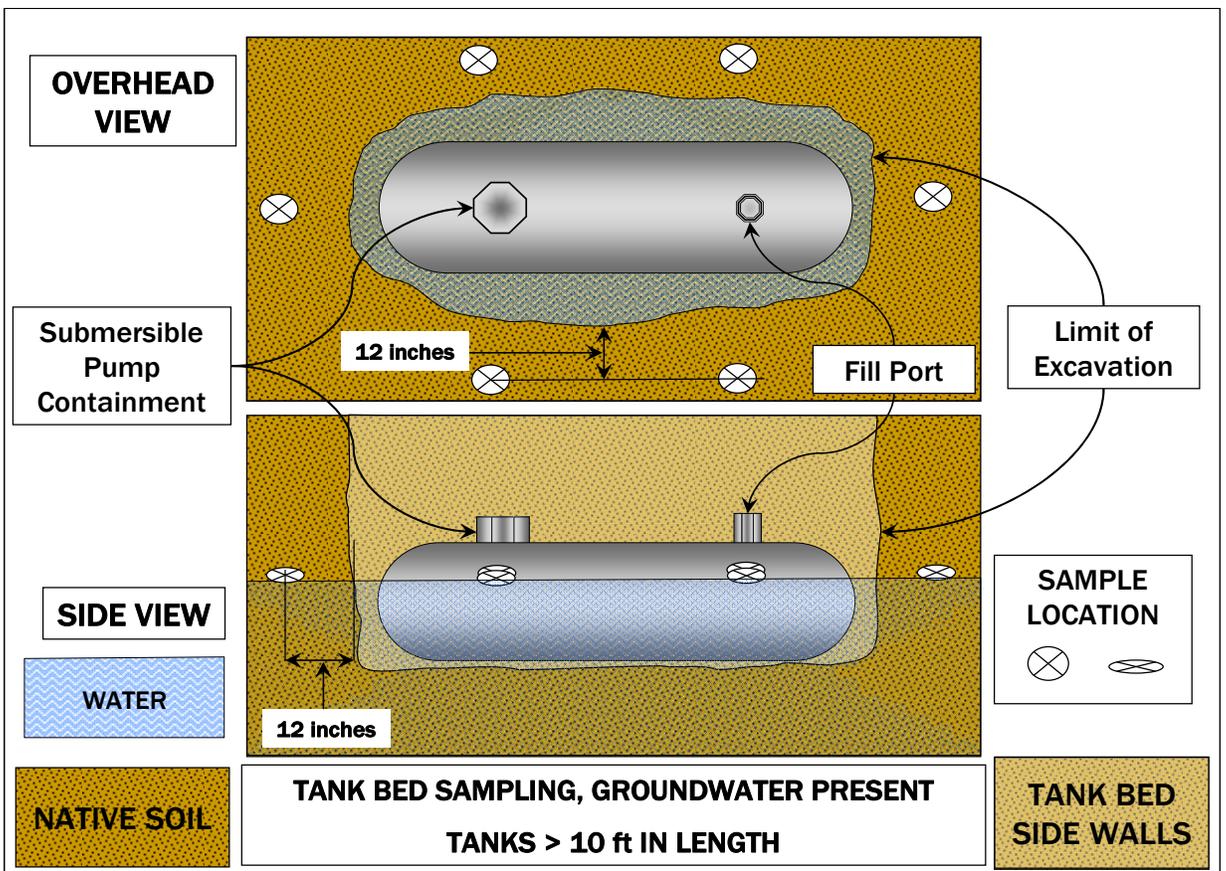
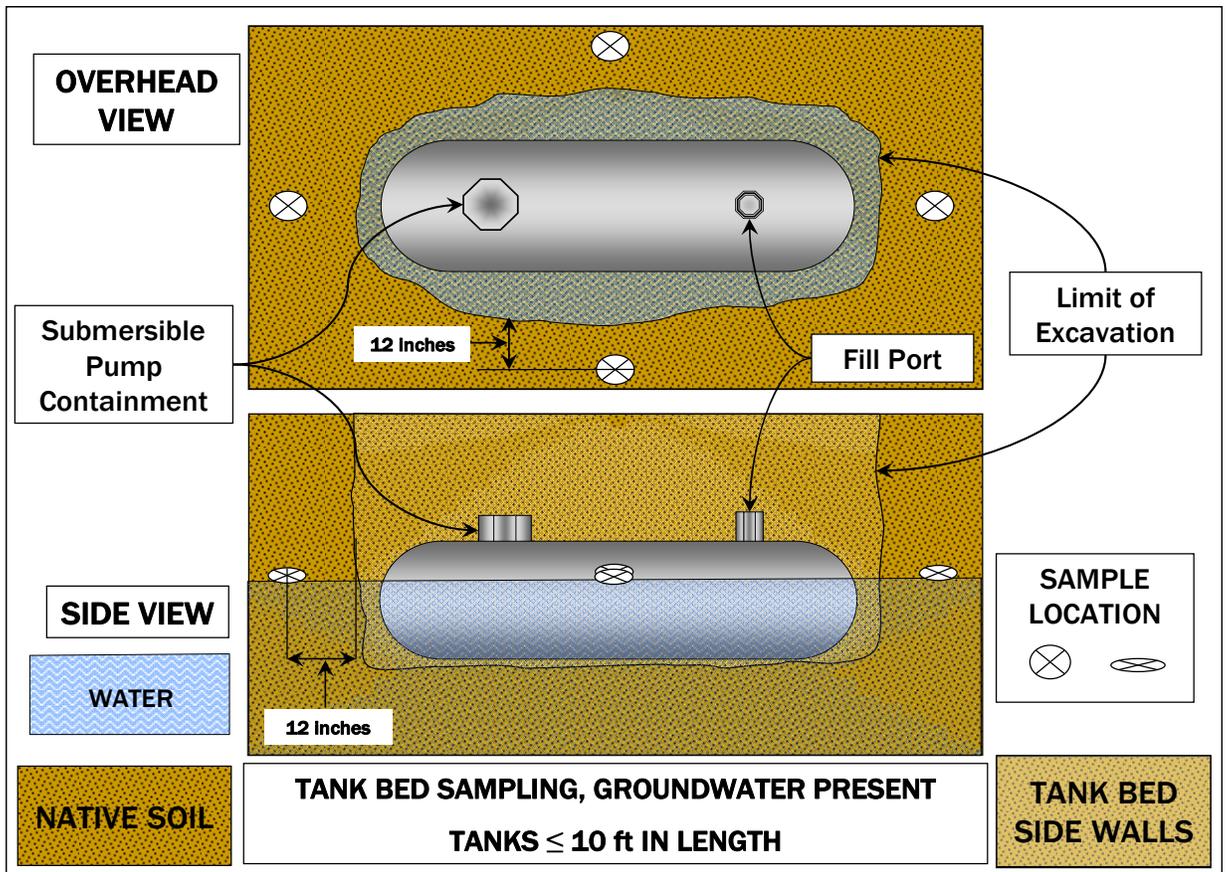
≤ 10 feet

> 10

Minimum Number of Soil Samples Per Tank

4 samples, at the soil-water interface: 1 at end of each tank and 1 on each side of tank, mid-region.

6 samples, at the soil-water interface: 1 at each end of tank and 2 on each side of tank – 1 in line with fill port and 1 in line with pump containment. (If the fill port is within 3 feet of tank end, then collect the 2 side fill port samples from mid-region of the tank.)



(b) Multiple Tanks

Length of Tank

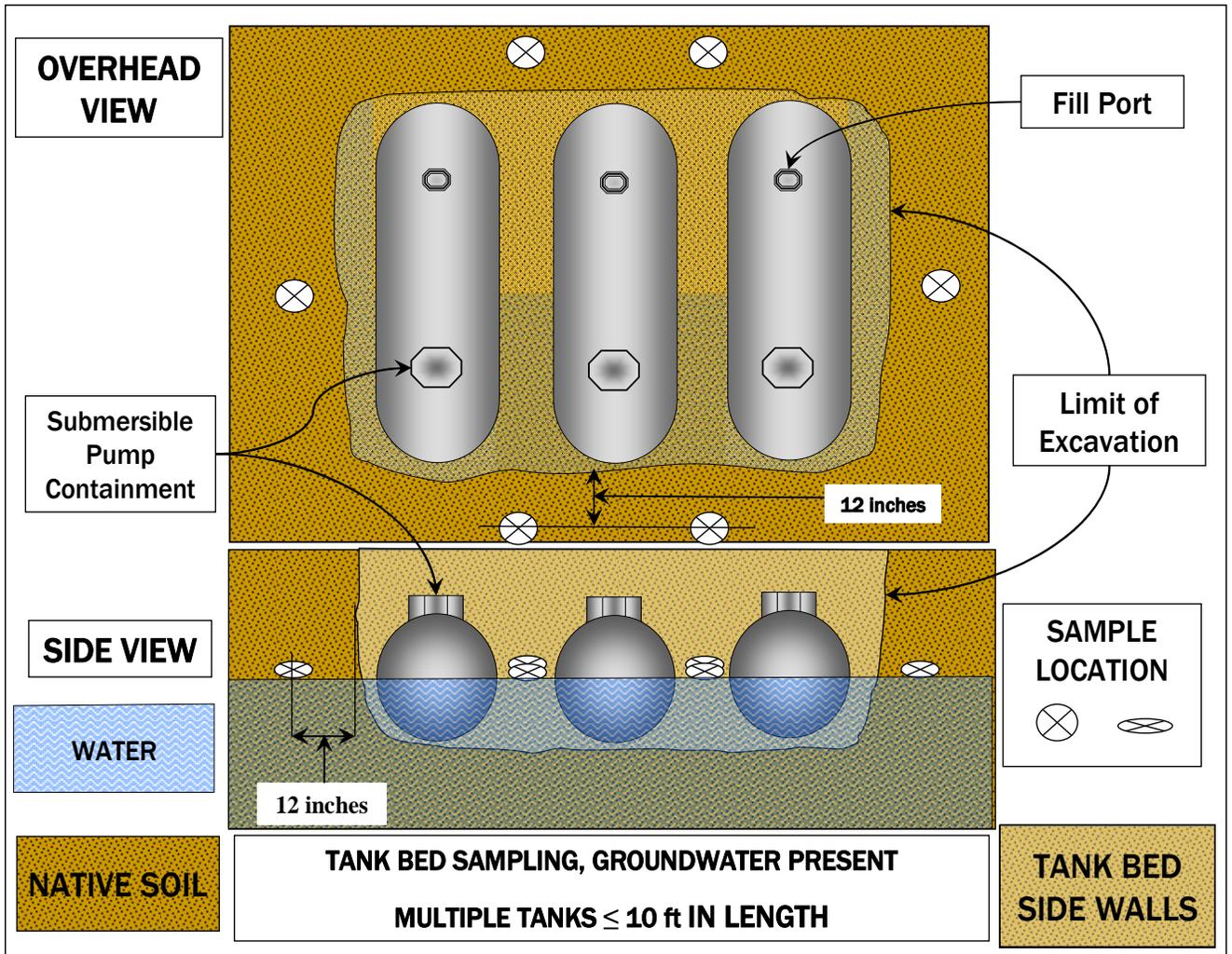
≤ 10 feet

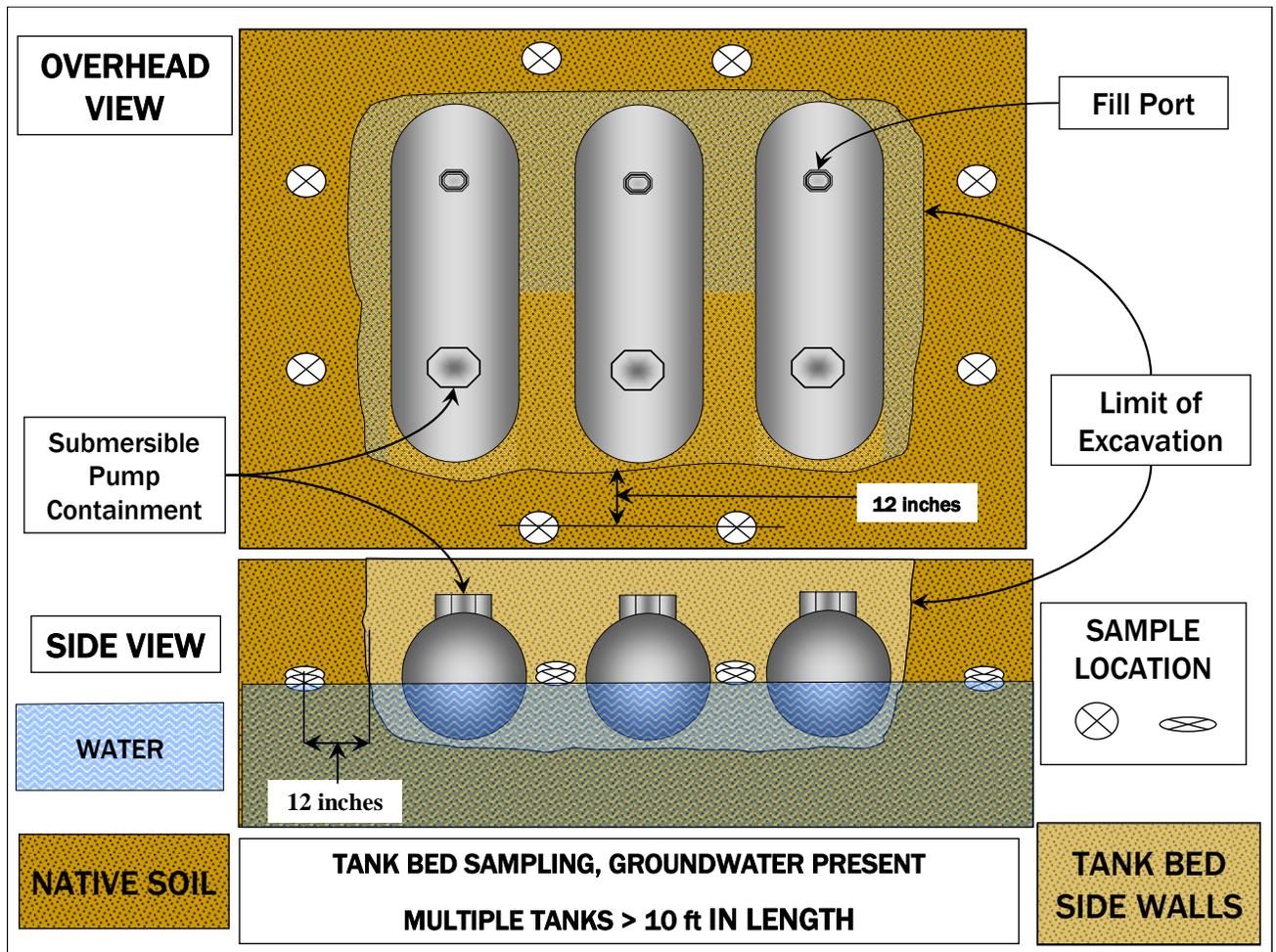
> 10

Minimum Number of Soil Samples Per Tank Bed

6 samples, at the soil-water interface: 1 in the gap between each set of tanks at end of each tank and 1 off the side of each of the outermost tanks – mid-region of the tank.

8 samples, at the soil-water interface: 1 in the gap between each set of tanks at end of each tank, and 2 on each side of each of the outermost tanks – 1 in line with fill port and 1 in line with pump containment. (If the fill port is within 3 feet of the tank end, then collect the 2 side fill port samples from middle of tank.)





B) PIPING AND DISPENSER SAMPLING

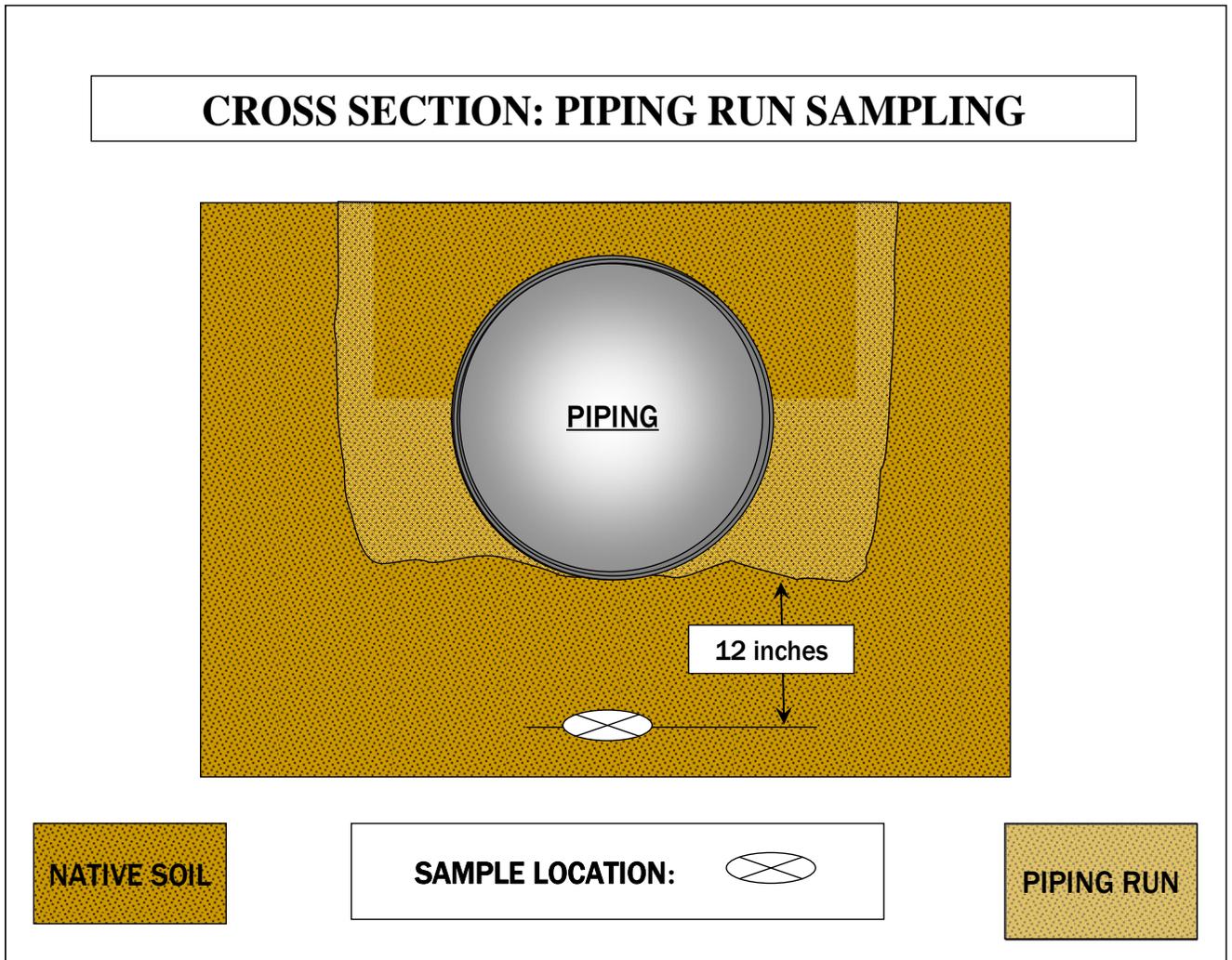
1) Piping Runs

Studies from various sources, including the EPA, have shown that leaks from piping are the second-most common UST leak source. Therefore, the Department strongly recommends the use of as-built drawings, remote sensing techniques, or excavation to locate all piping prior to initiating sampling. Completely expose the piping to better see where joints, bends, connectors and areas of obvious contamination are located. When performing a UST system closure, all piping must be either removed from the ground or properly closed in-place. Collect grab samples of native soil from beneath the piping, approximately 1 foot below the base of the trench floor. Locations such as at elbows (where the piping changes direction), connectors, joints, any corrosion holes or other evidence of potential contamination must be targeted for sampling.

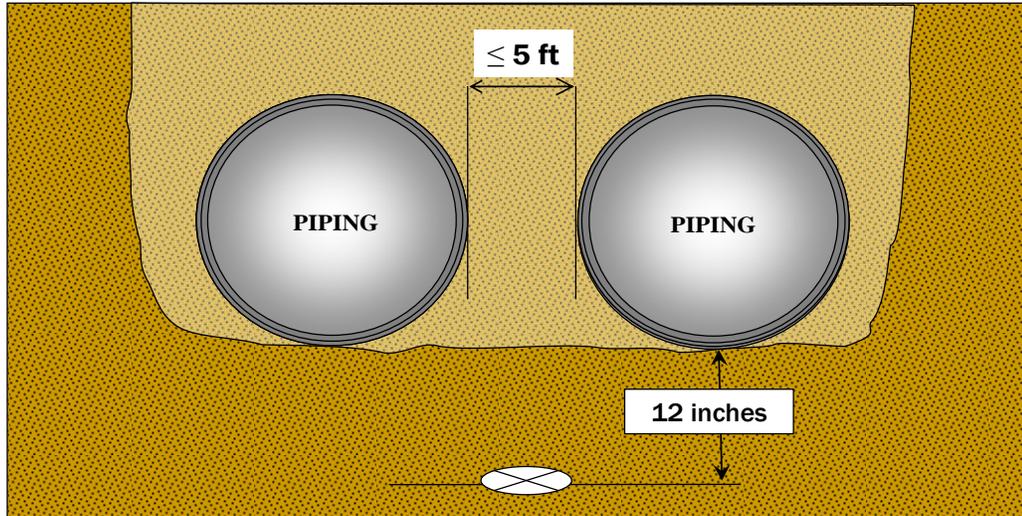
In those cases where none of the aforementioned sampling locations exist along a piping run, at least 1 native soil sample should be collected for every 20 feet of piping. For an assessment associated with a repair, sampling is typically needed only in the vicinity of the repair, unless

there is evidence that suggests the impact of a release extends beyond the immediate vicinity of the repair.

Note: If the dispenser(s) are located over the tanks, and there is no remote fill port, then dispenser samples will satisfy piping run sample requirements. If a piping run contains more than 1 product line, or if lines are within 5 feet of each other, only 1 sample need be collected from between the lines for every 20 linear feet of the piping group. The following diagrams show the locations of the required piping run samples.



**CROSS SECTION:
PIPING RUN SAMPLING - MULTIPLE PIPES**



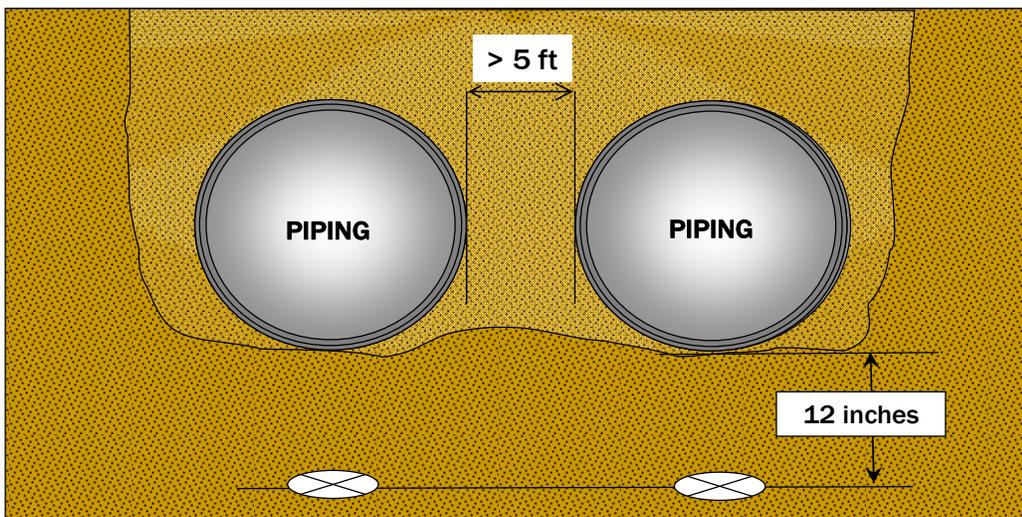
NATIVE SOIL

SAMPLE LOCATION:



PIPING RUN

**CROSS SECTION:
PIPING RUN SAMPLING - MULTIPLE PIPES**

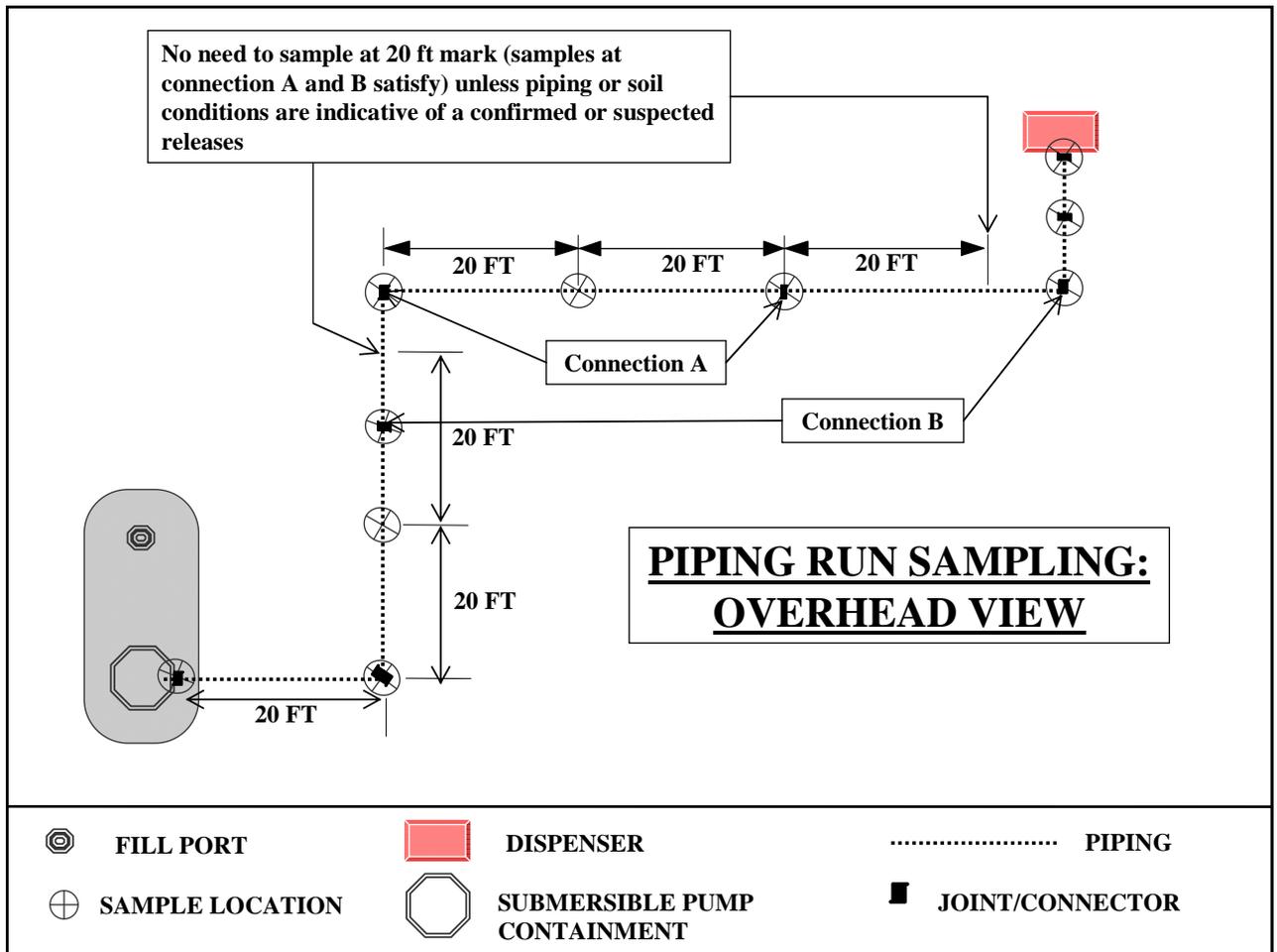


NATIVE SOIL

SAMPLE LOCATION:



PIPING RUN

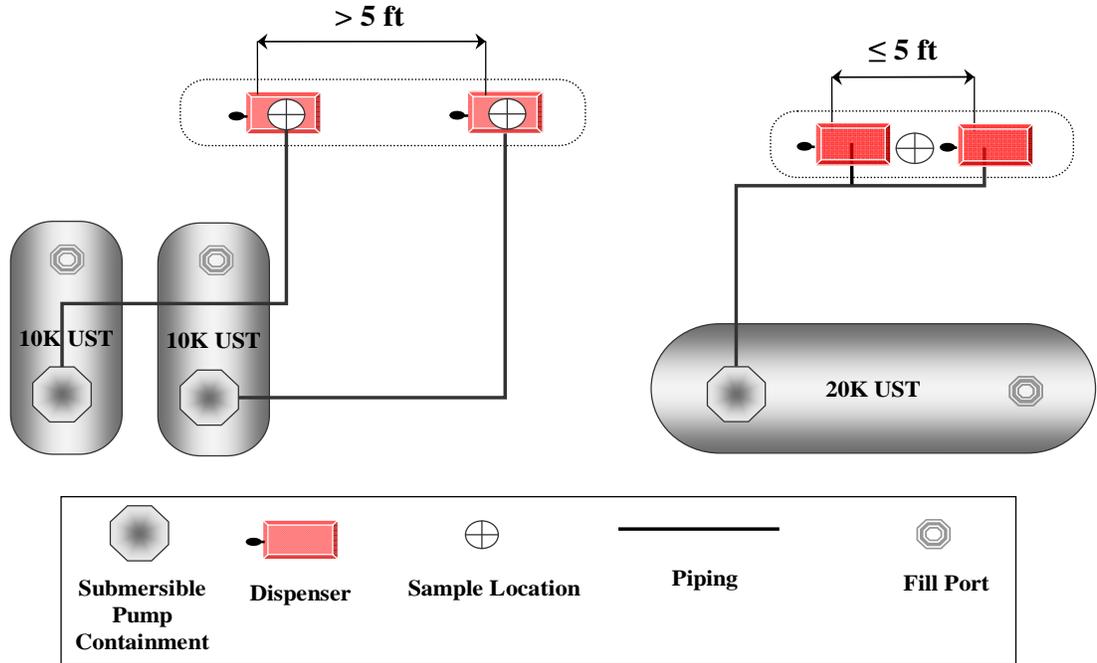


2) Dispensers

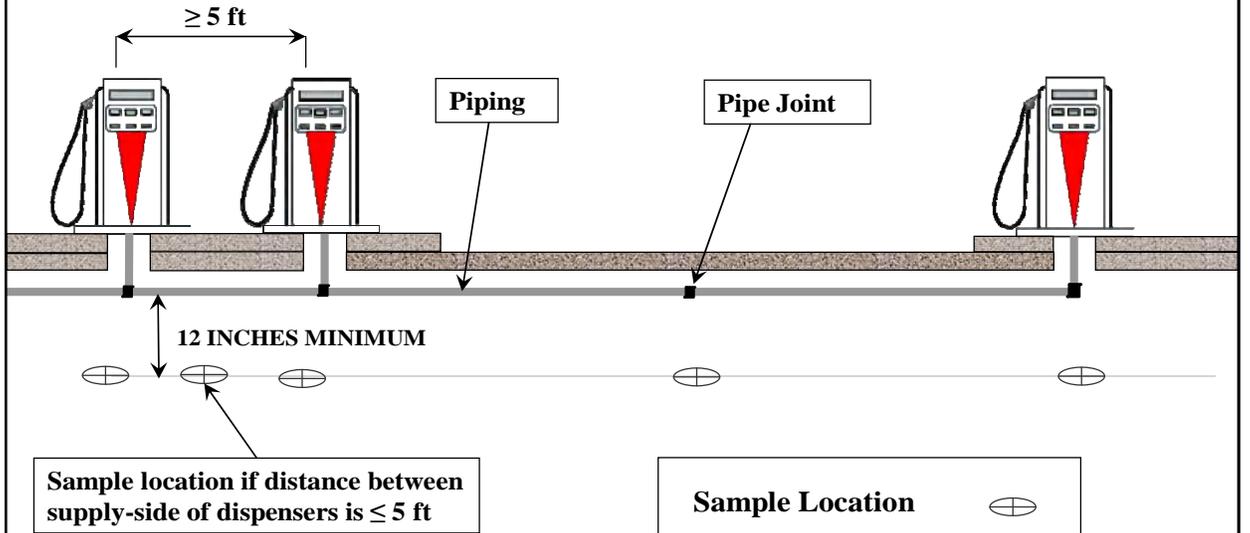
Take 1 discrete grab sample per dispenser. Collect samples of native soil from beneath the dispenser at a depth of at least 12" below the dispenser supply piping. If two dispensers are located within 5 feet of each other as measured from supply-side to supply-side, then only one (1) boring, advanced exactly midway between the supply-sides of the dispensers will satisfy dispenser sampling requirements for both dispensers.

Note: If the dispenser(s) are located over the tanks, and there is no remote fill port, then dispenser samples will satisfy piping run sample requirements as well.

DISPENSER SAMPLING: PLAN VIEW



DISPENSER SAMPLING: CROSS-SECTIONAL VIEW



C) SAMPLING LOCATIONS FOR TANK SYSTEM CLOSURE IN-PLACE OR CHANGE IN SERVICE TO STORE A NON-REGULATED SUBSTANCE

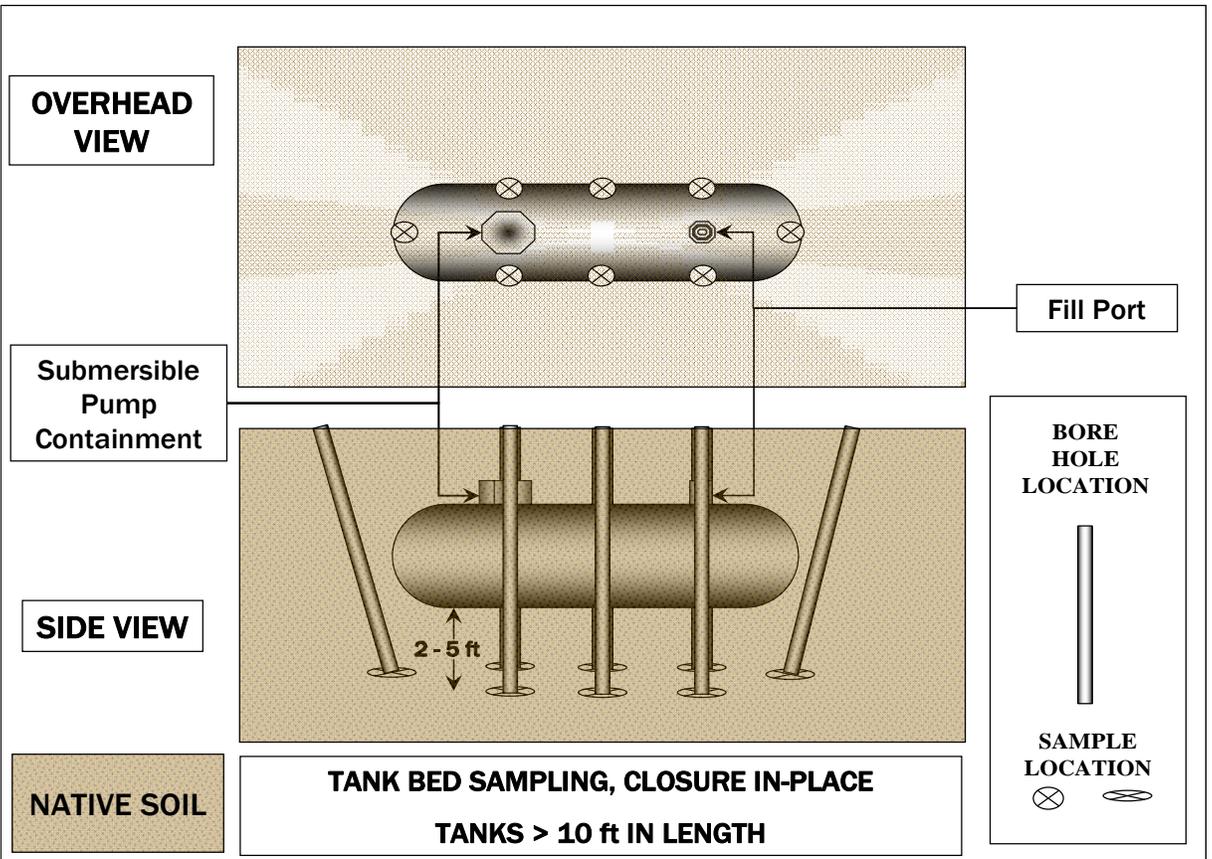
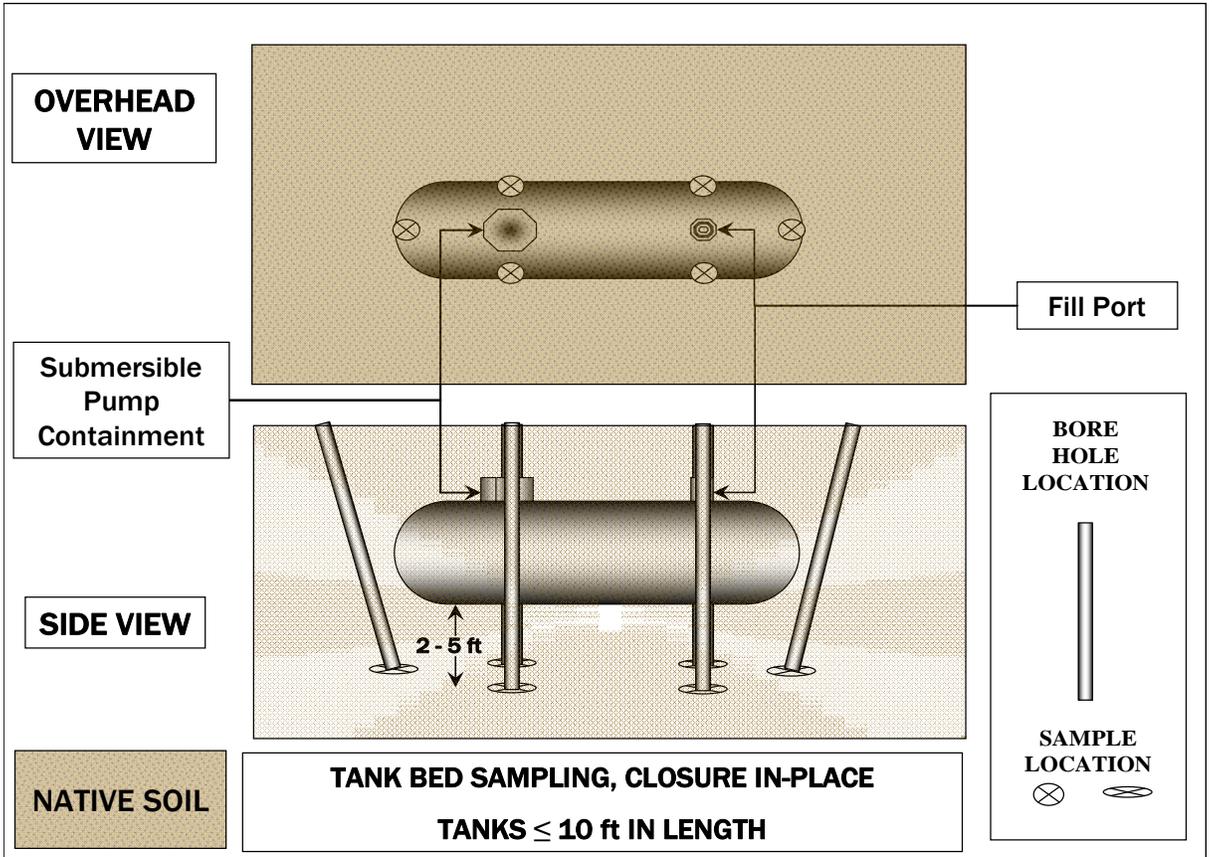
Since potentially contaminated soils cannot be seen as easily during either a closure in-place or a change in service, as compared to when a tank system is removed, the sampling requirements are more conservative. You must follow the steps given in this document unless special circumstances do not allow these steps. For those circumstances, an alternative sampling plan must be submitted to the Department for approval at least 15 days prior to commencing field activities.

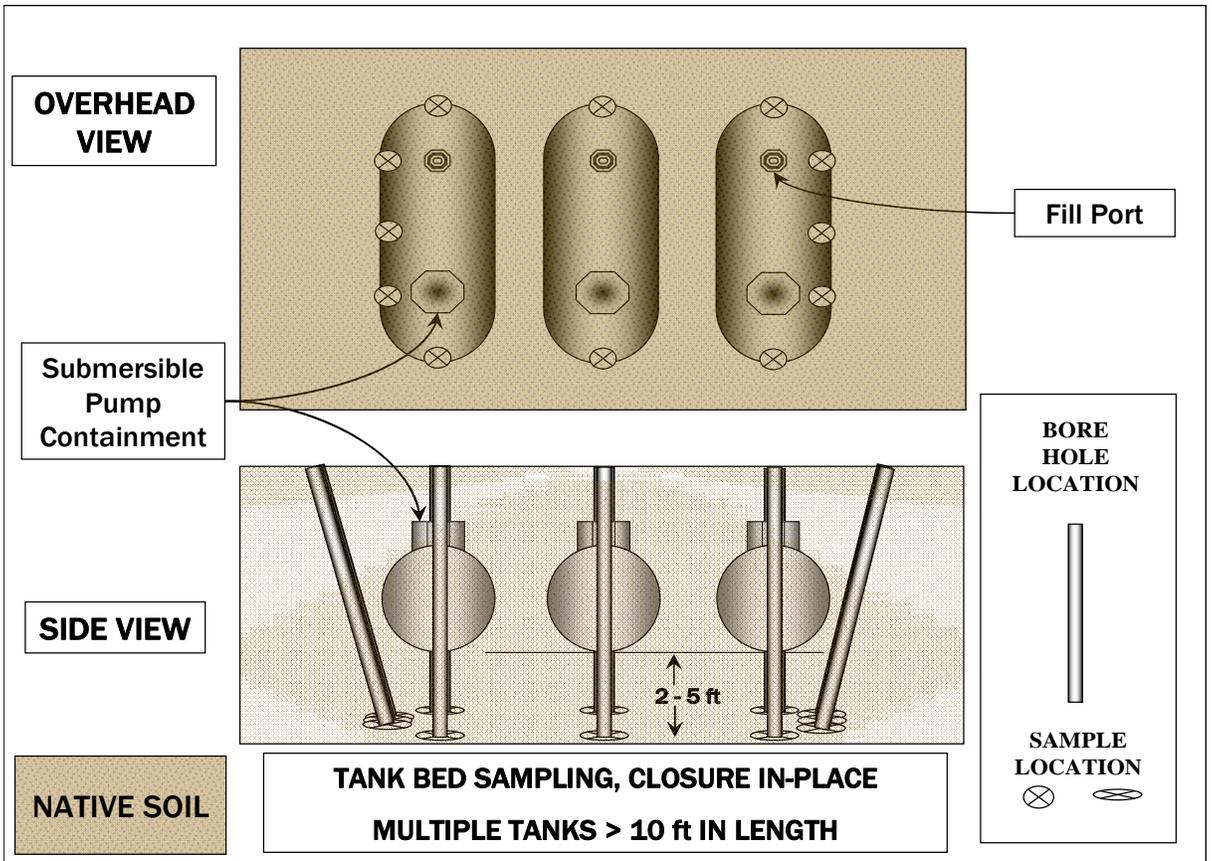
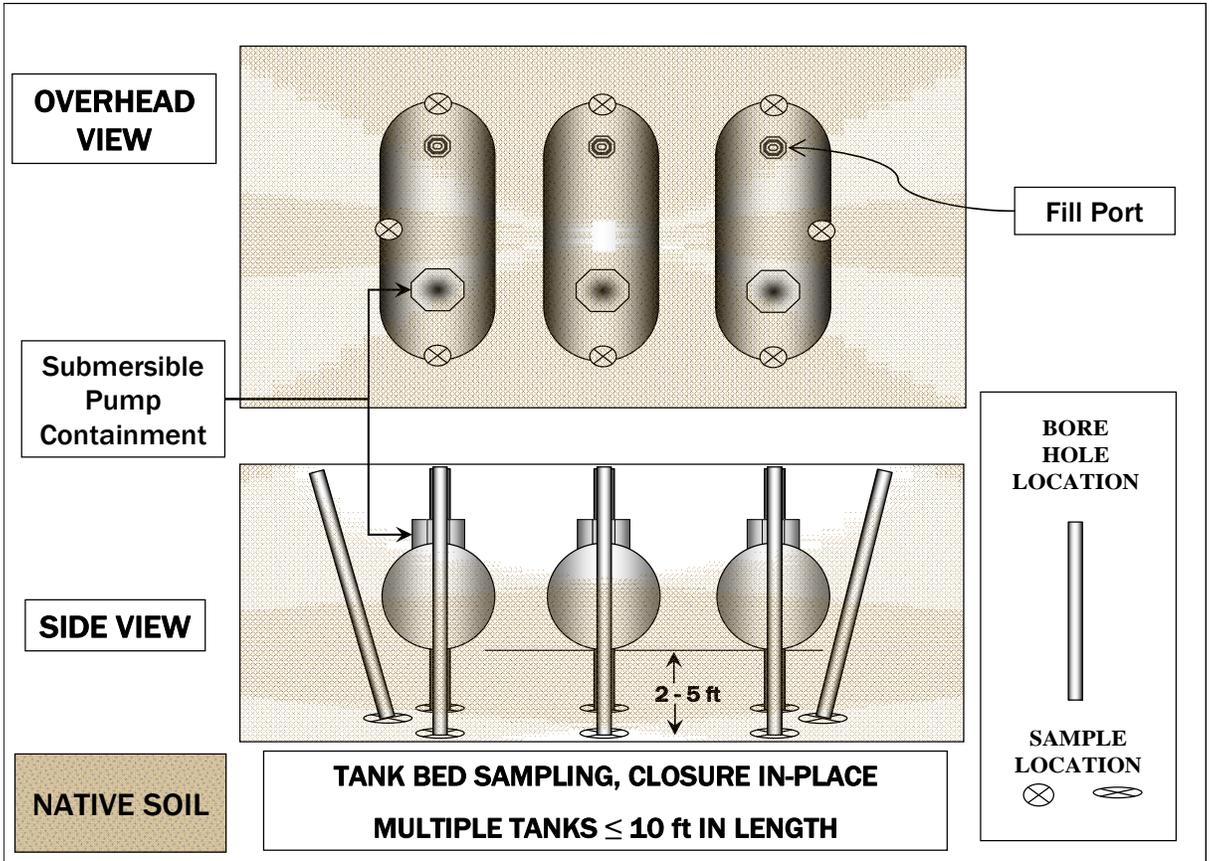
Tanks and piping closed in-place must be cleaned and filled with an inert, solid material, after receiving permission for the closure from the Department or an authorized agent. All tank and piping sludge removed during the cleaning process must be properly disposed of in accordance with all regulatory requirements (see Attachment 3).

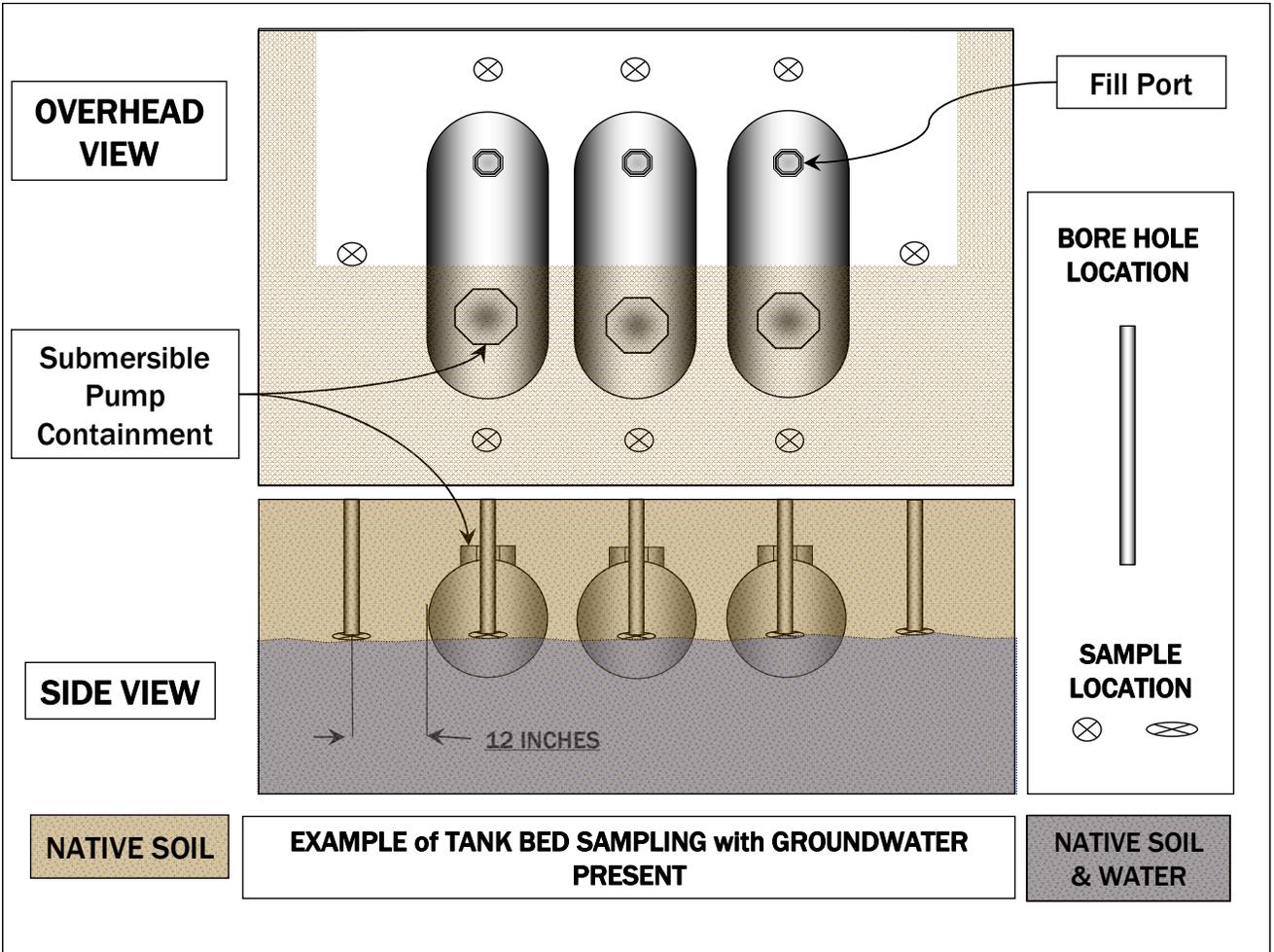
If a suspected or obvious release is encountered during a change in service to store a non-regulated substance, the same notification and sampling requirements that apply to permanent closure in-place of a tank system must be followed. Sampling must be conducted in the same manner as tank system closure in-place, and the interior of the tank must be properly cleaned. In addition, the Department must be notified of the change in service.

1) Tank Bed

Drill, hydraulic probe or hand auger at the locations depicted in the following diagrams. Each boring must be within 3–5 feet of the tank and angled in toward the midline of the tank bed. The objective is to collect samples beneath and along the midline of the tank. Borehole total depth must be 2 feet deeper for low permeability soils (clay or silt), and 5 feet deeper for high permeability soils (sand or gravel), than the bottom of the tank bed. Collect 2 samples from each boring. Collect 1 sample from the interval with the greatest visual, olfactory, or field-screening-instrument indication of contamination; or if no indication, (1) immediately above the soil-water interface if water is encountered (see diagram on page 31), or (2) between tank midpoint and total depth. Collect a second sample at total depth. For an assessment associated with a repair, sampling is typically needed only in the immediate vicinity of the repair.







2) Piping

Use the same sampling method as was used for tank closure in-place, except that the borings are to be performed along the piping run. One discrete sample is to be collected from native soil under each connector, elbow, bend, etc., at a depth of 2 feet below the piping for low permeability soils (e.g., clays, silts, fine sands) and at 5 feet below the piping for high permeability soils (e.g., medium to coarse sand, gravel). A minimum of 1 sample is to be collected every 20 linear feet of piping. If the distance between 2 parallel piping runs is ≤ 5 feet, then only 1 borehole need be performed between the piping runs.

D) EXAMPLES FOR REPLACEMENTS OR REPAIRS

Below are several procedure examples to follow when you are only replacing piping or tanks or abandoning a dispenser island:

- **I am only abandoning an island – the facility will remain operating as a UST facility.** In this case, you must submit the TSSA forms and indicate on the form that only piping is being closed. The section of piping that supplied the abandoned dispenser island must also be closed in accordance with the requirements of this document and chapter Comm 10.

- **I am only replacing the piping – the facility will remain operating as a UST facility and all of the new piping will utilize the existing trenches/dispenser islands.** In this case, you must submit the TSSA forms and indicate on the form that only piping is being removed. All replacement piping must be closed in accordance with the requirements of this document and chapter Comm 10.

- **I am only replacing the tanks – the existing piping will be utilized.** In this case, you must submit the TSSA forms and indicate on the form that only tanks are being closed. The tanks must be closed in accordance with the requirements of this document and chapter Comm 10.

- **I am only repairing the piping.** In this case, you must notify the field inspector of your intent and indicate on the TSSA form that only piping repair is being performed. For an assessment associated with a repair, sampling is typically needed only in the vicinity of the repair, unless there is evidence that suggests the impact of a release extends beyond the immediate vicinity of the repair.

V) REPORTING

A) REPORT FORM

Sampling results are to be reported on part B of the Department's Tank System Service and Closure Assessment Report Form ERS-8951, which is included at the end of this publication. This form is also available from the Division at P.O. Box 7837, Madison, WI, 53707-7837, or at telephone (608) 266-7874; or from the Division's Web site at <http://www.commerce.state.wi.us/ER/ER-BST-FM-Comm10Forms.html>.

B) CONTACT INFORMATION

1) Emergencies

For emergencies, such as fires, explosions, or vapor hazards, immediately call the local emergency response personnel by dialing 911; and then call the statewide spills hotline at **800-943-0003**, and the corresponding Department of Natural Resources regional spill coordinator shown under the following DNR Web site: <http://dnr.wi.gov/org/aw/rr/spills/>.

2) Non-Emergencies, and Follow-Up After Reporting an Emergency

(a) Reporting Releases

Owners or operators or other persons who cause non-emergency releases of regulated substances are required to report the release as soon as reasonably possible, in accordance with section 292.11 (2) of the Statutes, to the corresponding Department of Natural Resources regional spill coordinator shown under the following DNR Web site: <http://dnr.wi.gov/org/aw/rr/spills/>. The notification form for reporting non-emergency hazardous substance releases can be downloaded at the following Web site: <http://www.dnr.state.wi.us/org/aw/rr/archives/pubs/4400-225.pdf>.

(b) Reporting TSSA Findings to the Facility Owner or Operator

All TSSAs must be documented on the ERS-8951 form cited in section A above and submitted to the owner or operator within 21 business days after discovery of the conditions that resulted in the assessment.

(c) Reporting TSSA Findings to the DNR

- i. TSSA reports that document no contamination, for tank or piping removals, must be sent to the following address, within 21 business days after the removal.

UST Closure Assessments - RR/3
Department of Natural Resources
PO Box 7921
Madison WI 53707

- ii. TSSA reports that document an obvious release to the environment must be sent, within 21 business days after discovery of the release, either by mail or telefax to the Environmental Program Associate in the corresponding DNR regional office shown under the following DNR Web site: <http://dnr.wi.gov/org/aw/rr/spills/>. The fax numbers and addresses for the DNR regional offices are as follows:

<u>Abbreviation</u>		<u>Region Fax #</u>
NER	Northeast Region	920-662-5197
NOR	Northern Region	715-365-8932
SCR	South Central Region	608-273-5610
SER	Southeast Region	414-263-8716
WCR	Western Central Region	715-839-6076

Mailing Addresses:

Northeast Region (NER)
2984 Shawano Ave, PO Box 10448
Green Bay WI 54313

Southeast Region (SER)
2300 N. Martin Luther King Dr
Milwaukee WI 53212

Northern Region (NOR)
107 Sutliff Avenue Box 818
Rhineland WI 54501

Western Central Region (WCR)
1300 W. Clairemont Avenue Call Box 4001
Eau Claire WI 54702-4001

South Central Region (SCR)
3911 Fish Hatchery Road
Fitchburg WI 53711

NOTE: Completion of the release notification may cause the case to move out of the Commerce TSSA process and into the NR 700 process.

NOTE: Failure to notify the DNR of a release may have serious consequences including forfeitures of not less than \$10 nor more than \$5000 for each violation. Be aware that each day of continued violation is a separate offense, and that each tank which is in violation is a separate offense.

NOTE: Department of Commerce staff and authorized agents of the Department, such as Local Program Operators, periodically inspect storage facilities for petroleum products and other hazardous substances. These inspectors have authority to report any release encountered during these inspections that has not been reported to the DNR by the owner or operator – and these releases may become the subject of formal enforcement actions.

C) WHERE TO OBTAIN ADDITIONAL INFORMATION

The Petroleum Products and Tanks Bureau of the Commerce ERS Division is the primary unit responsible for the regulation of Wisconsin's underground and aboveground storage tank systems through the Comm 10 regulations.

The DNR's Remediation and Redevelopment Program and Commerce's ERS Site Review Section oversee the investigation and cleanup of environmental contamination that includes storage tank investigations and cleanups through the NR 700 regulations.

Additional information can be found at the following Commerce and DNR Web sites:

<http://commerce.wi.gov/ER/ER-BST-HomePage.html>

<http://commerce.wi.gov/ER/ER-PECFA-Home.html>

<http://www.dnr.state.wi.us/org/aw/rr/index.htm>

VI) REFERENCES

- 1) NFPA Standard 329, Recommended Practice for Handling Underground Leakage of Flammable and Combustible Liquids – may be used for guidance in the investigation of releases.
- 2) Guidance on Conducting Environmental Response Actions (PUBL-SW-157-92).
- 3) Soil Sampling Requirements for LUST Site Investigation and Excavation (PUBL-SW-127; Appendix Q of the *Guidance on Conducting Environmental Response Actions-4/92*).
- 4) Cleanup Process for the Emergency and Remedial Response Program (PUBL-SW-132-3/92).
- 5) Selecting an Environmental Consultant (PUBL-SW-113-11/91).
- 6) Solid Waste Rules Concerning Petroleum Contaminated Soil (Appendix 0 of the *Guidance on Conducting Environmental Response Actions-4/92*).
- 7) LUST and Petroleum Analytical and Quality Assurance Guidance (PUBL-SW-130-93; Appendix B of the *Guidance on Conducting Environmental Response Actions-6/93*).
- 8) LUST Field Screening Procedures (PUBL-SW-176).

These references are available from:

LUST Information Requests
Department of Natural Resources
P.O. Box 7921
Madison, WI 53707
(608) 266-2111

ADDITIONAL INFORMATION FOR CERTIFICATION

- 9) *Field Measurements: Dependable Data When You Need It*, EPA publication 530/UST-90/003, September 1990. Provides information on field screening techniques for petroleum releases. Superintendent of Documents Stock No. 055-000-00368-8, U.S. Government Printing Office, Washington, D.C. 20402 (202) 783-3238. \$5.50, Visa and MasterCard accepted.
- 10) *A Guide to the Assessment and Remediation of Underground Petroleum Releases*, API Publication 1628, 2nd Edition, 1989. Pages 1-20 provide an excellent overview of where to look for spilled petroleum. American Petroleum Institute, 1220 L St NW, Washington, DC 20005 (202) 682-8000. \$37.00 + shipping and handling if prepaid.

ATTACHMENT 1

RELEASE REPORTING QUESTIONS AND ANSWERS

Who is legally responsible for reporting releases?

The person(s) in possession or control of the hazardous substance that was discharged or who caused the discharge of the hazardous substance. This is usually the owner/operator of the property on which the discharge occurred, however it can also be a generator, transporter or other person.

Is it solely the owner or is the contractor legally responsible as well?

The contractor is only responsible if he/she is in "possession/control" or "caused" the hazardous substance discharge.

Can the owner tell the contractor "I will report the release, fill in the excavation"?

Yes, the owner can tell the contractor to do so. However, if contaminated soil is used to fill in the excavation, the contractor has violated solid/hazardous waste disposal requirements and the contractor would then also have a responsibility to report a hazardous substance discharge under section 292.11(2), Wis. Stats.

What would be the contractor's liability if the release went unreported?

If clean fill was used to backfill the excavation, it depends upon the harm caused by the failure to report. It is possible that if a threat to public health or safety exists as a result of the failure to notify, the contractor would be liable to the third party who was injured (e.g., explosive vapors present and someone is injured in an explosion). If contaminated material was used to backfill the excavation, the contractor may be as liable as the property owner for cleanup, and may also be penalized for the failure to notify and for the illegal disposal.

Can the contractor withhold the information on the basis of the client-consultant relationship?

Be aware that under s. 292.11(8), Wis. Stats., the Department of Natural Resources (DNR) and its authorized representatives are able to access property and inspect any record relating to a hazardous substance for the purpose of ascertaining compliance with s. 292.11, Wis. Stats. It is likely that the DNR would be able to obtain the information under this authority.

How can parties report releases to meet their legal obligations?

Either by contacting DNR directly or by phoning DNR's designated 24-hour telephone number, (800) 943-0003. This number is answered by the Division of Emergency Government (DEG) and receives calls covering all "emergencies." However, the LUST program requests that releases be faxed to the appropriate regional office using the fax format, and that the DEG number be used for emergency situations.

Can parties report releases by telefax or federal express?

Yes, as long as they comply with the "immediate" time frame. Often the phone number for the appropriate DNR staff person is busy, and faxing the notification is a more timely method of release reporting.

What information should be reported in a release notification?

The following information is usually requested by the DNR. Reporters should provide additional information that they think is relevant

1. Name, address and telephone number of the person reporting the discharge.
2. Name, address and telephone number of the responsible parties or the potentially responsible parties.
3. Date, time and duration of the discharge.
4. Location of the discharge, including the legal description (public lands survey system) if available.
5. Identity, physical state and quantity of the hazardous substance discharged.
6. Physical, chemical, hazardous and toxicological characteristics of the hazardous substance.
7. Cause of the discharge.
8. Emergency response or other response actions being taken.

9. Source, speed of movement and destination or probable destination of the discharged hazardous substance.
10. Distance and direction to the nearest inhabited buildings.
11. Impacts to the environment including air, land, and waters of the state and private wells.
12. Weather conditions existing at the scene, including wind direction and velocity.
13. Name, address and telephone number of environmental contractors (closure assessment, investigation) involved.
14. Additional information deemed relevant by the reporter.

ATTACHMENT 2

CONTRACTOR CERTIFICATION IN WISCONSIN

Regulatory Overview

In 1988, the federal government promulgated comprehensive UST regulations dealing with prevention, detection and cleanup of releases from USTs. Two state agencies implement these regulations in Wisconsin.

The Department of Commerce's Environmental and Regulatory Services Division regulates the installation, operation, and closure of underground and aboveground storage tank systems (Tanks Bureau); administers the financial reimbursement program (PECFA); and is responsible for overseeing environmental cleanups for low- and medium-risk sites (PECFA-eligible and non-PECFA eligible). These responsibilities include:

1. Technical code and standard consultation.
2. Permitting and registration of aboveground and underground flammable, combustible and hazardous liquid storage tanks.
3. Retail service station inspection and petroleum product testing.
4. Maintaining a statewide aboveground and underground storage tank database.
5. Review of system design plans for storage or dispensing system installation, modification or upgrade.
6. Credential administration for individuals working in certification requiring specialties.
7. Contractor Certification.
8. Administration of the Comm 10 Local Program Operator program.
9. Performance standards for new UST systems.
10. Spill and overfill control requirements.
11. Corrosion protection requirements.
12. Facility operations reporting and record keeping.
13. Release detection, reporting and record keeping.
14. UST closure and closure assessment, and reporting of suspected releases.
15. Release investigation and confirmation.
16. Reporting and cleanup of spills and overfills.
17. Initial response to releases, and abatement measures.
18. Free-product removal.
19. Investigations for soil and groundwater cleanup.
20. Corrective action plans to address contamination.

The Department of Natural Resources (DNR) is responsible for overseeing environmental cleanups at sites where a hazardous substance(s) has/have been released into the environment (this includes "High Risk" petroleum releases). The DNR administers rules pertaining to:

1. Reporting of suspected releases.
2. Release investigation and confirmation.
3. Reporting and cleanup of spills and overfills.
4. Initial response to releases and abatement measures.
5. Free product removal.
6. Investigations for soil and groundwater cleanup.
7. Corrective action plans to address contamination.
8. Public notification of releases.

Contractor Registration, Certification, and Qualifications

Contractor Certification under Chapter Comm 5, Wis. Admin. Code.

Comm 5 establishes contractor certification in the following categories:

1. Underground tank system installers.
2. Tank system tightness testers.
3. Aboveground tank system installers.
4. Tank removers and cleaners.
5. Tank-system site assessors.
6. Tank system inspectors.
7. Underground tank system liners.

Certification is only required when work is performed on a tank system covered by Comm 10. That means:

- The **tank-system site assessor** must be certified only when Comm 10 requires a TSSA, e.g., for fleet and retail motor fuel tanks; farm and residential non-commercial motor fuel tanks of 1100 gallons or more; and heating oil USTs of 4000 gallons or more, and
- The **tank removers and cleaners** must be certified for all tanks covered by the Comm 10 closure requirements. In essence, this means all underground tanks of 60 gallons or more and all aboveground tanks of 110 gallons or more (except for field-erected tanks and heating fuel tanks for 1- or 2-family dwellings), where the product stored is flammable, combustible or hazardous.

Information on contractor certification may be requested from:

The Department of Commerce
Environmental and Regulatory Services Division
Bureau of Petroleum Products and Tanks
Attention: Mr. Cerry Hermosillo
P.O. Box 7838
Madison, WI 53707-7838
(608) 266-7874
FAX (608) 261-7725

Consultant Registration under ch.Comm 47, Wis. Admin. Code.

Commerce also requires that consultants register in order for their work to be reimbursed by PECFA. A list of registered PECFA consultants is maintained by the Department. Contact Mr. Cerry Hermosillo at (608) 266-7874 for a registration form.

Consultant Qualifications under Chapter NR 712, Wis. Admin. Code.

There is no formal approval process for doing environmental cleanup work under chapter NR 712 Wis. Admin. Code in Wisconsin. Consultants are required to have specific qualifications to do specific work as outlined in NR 712. Copies of the NR 700 series are available from the Department of Administration, Document Sales (see below). Additional information including copies of detailed technical guidance for environmental cleanups is available from the Emergency and Remedial Response Section, Public Information Requests, at (608) 264-6009. A publication checklist and instructions for ordering publications is included elsewhere in this publication.

The DNR maintains lists of environmental consultants in different categories (see publication checklist). All of this information is self-reported and the DNR makes no warranties regarding its accuracy or the reliability of firms on these lists. The DNR also maintains data on environmental consultants who have indicated they wish

to be considered for state projects. The list of consultants who have provided information is enclosed. The actual data is intended for Department use, and specialized reports are prepared on a site-specific basis. However, the data is public information and may be requested in its entirety in the form used by the Department (computer disk). To get on the lists, request the "Survey of Environmental Companies" and return it to the address on the publication checklist.

Copies of Administrative Rules can be purchased from the Department of Administration:

Document Sales
P.O. Box 7840
Madison, WI 53707
(608) 266-3358
1-800-362-7253

The following rules relate to tank-system site assessments:

Chapter Comm 10

Chapter Comm 47

Chapters NR 700-736

ATTACHMENT 3

PETROLEUM TANK AND SLUDGE MANAGEMENT FACT SHEET

Many owners of underground storage tanks (USTs) are in the process of removing or upgrading their tanks to come into compliance with new Environmental Protection Agency (EPA) regulations. Tank owners are responsible for properly managing any waste and product that remains in tanks which are being upgraded or removed.

The Department of Commerce regulates petroleum products. See "Management of Petroleum Products at Tank Closure" for product handling guidance. Commerce considers tank contents less than two inches above the water line or the tank bottom to be wastes. These wastes are regulated by the Department of Natural Resources (DNR) as either sludge or wastewater.

Tank sludge is a solid waste regulated under chapter 144, Wis. Stats. Depending on the products stored in tanks, it may also be a hazardous waste. The state has the authority to impose civil or criminal penalties against tank owners, tank excavators, tank transporters, and tank salvagers who improperly dispose of tank sludge. The tank owner is responsible for classifying tank waste and making sure it is properly handled and disposed of in compliance with the regulations. Wastewater is regulated by DNR under chapters 281 and 283, Wis. Stats.

An owner or operator who permits improper disposal may become ineligible for reimbursement under the state's Petroleum Environmental Cleanup Fund Award program (PECFA).

WASTEWATER HANDLING

Wastewater may be generated from either removal of tank condensate or from tank washing. It must be disposed of legally. Some tank excavation services include wastewater disposal. In sewered areas you may contact the municipal wastewater treatment plant for disposal approval. In unsewered areas you may contact a licensed septic disposal service to transport wastewater to a wastewater treatment plant. Septic haulers may not transport flammable liquids. Identify an acceptable method to dispose of wastewater prior to excavating tanks.

SLUDGE HANDLING

Tank sludge is solid waste. Tank owners are responsible for determining if it is also hazardous waste, and, if so, characterizing and managing it in accordance with all state and federal regulations. This is a technical procedure that should be handled by an experienced hazardous waste contractor. If there is a possibility that at any time the tank contents were not clean fuels, additional analysis is required to identify residual wastes (PCB's, solvents, etc.). Complete analysis must be performed for waste oil tank sludge.

Tank sludge that has been classified as non-hazardous may be:

- a. Removed by a waste oil service for recycling.
- b. Disposed of in a licensed sanitary landfill with a clay liner if the sludge does not contain free liquids as determined by the paint filter test (EPA SW-846 methods, update II). Free liquids may be absorbed by adding clean absorbent materials such as sawdust or vermiculite.

Tank sludge that has been classified as hazardous must be:

- a. Transported to a licensed treatment, storage or disposal facility by a licensed hazardous waste transportation service.
- b. Manifested for transportation using a U.S. Environmental Protection Agency (EPA) identification (ID) number.

ID numbers can be obtained by completing an EPA notification form (8700-12, rev. 10-88). This form can be obtained from WDNR by contacting Mr. David Kollasch by phone [608 – 264-6022] or e-mail [david.kollasch@wisconsin.gov] or, by going directly to the US EPA web site by clicking on the following link: <http://www.epa.gov/epawaste/inforesources/data/form8700/8700-12.pdf>. The completed form must be submitted to:

Mr. DAVE KOLLASCH
NOTIFICATION COORDINATOR
Wisconsin Dept. of Natural Resources
PO Box 7921
Madison WI 53707-7921

The EPA ID number should be requested six weeks prior to tank excavation. ID numbers cannot be obtained from WDNR.

Sludge may be held on site while laboratory analysis is being completed, or it may be transported immediately by a licensed transporter. (Liquid tank sludge may be manifested as ignitable waste.) Some tank excavation companies offer sludge analysis and disposal services.

Sludge that is being held on site should be handled as follows:

- a. Consult the laboratory prior to sampling to determine proper sampling procedures and sample containers.
- b. Carefully transfer the sludge from the tank to a metal drum. Seal the drum, affix the date and label it "Petroleum Tank Sludge."
- c. To avoid contaminating non-hazardous sludge with hazardous sludge from other tanks, do not mix sludges from different tanks. Each sample jar and each sludge drum must be identified by matching numbers or descriptions.
- d. Handle sludge with care! Anyone transferring sludge must have proper training and wear protective clothing and gloves.
- e. Avoid spills! Spilling sludge may contaminate an otherwise clean tank excavation site. You must immediately report any spill to DNR and clean up the spill.
- f. Maintain the drums containing sludge in good condition and in a secure location while waiting for laboratory results. Report the location of sludge drums in the tank system site assessment report that you provide to the Department of Commerce and DNR.

ADDITIONAL INFORMATION AVAILABLE

Tank Excavation Services:

The Department of Commerce
Environmental and Regulatory Services Division
Bureau of Petroleum Products and Tanks
P.O. Box 7838
Madison, WI 53707-7838
(608) 266-7874
FAX (608) 261-7725

Hazardous Waste Management Services:

Bureau of Solid and Hazardous Waste Management
Department of Natural Resources
P.O. Box 7921
Madison, WI 53707

Certified Laboratories:

Office of Technical Services
Department of Natural Resources
P.O. Box 7922
Madison, WI 53707

Additional FACT SHEETS Available from DNR:

“What is Hazardous Waste?” (Publication WA-106 98)

“EPA Identification Number” (Publication WA-101)

“Hazardous Waste: Your Business Responsibilities” (Publication WA 294 2006)

DNR fact sheets and forms to obtain EPA identification numbers can also be obtained from DNR Regional Offices.

This fact sheet is a summary of regulations. It may not be used as a substitute for the statutes and codes administered by the Departments of Natural Resources; Commerce; Transportation; or the federal government. Consult the regulations and statutes for specific information. Remember, a tank owner, tank excavator, tank transporter and tank salvager may all be liable for improper sludge transportation and disposal.

ATTACHMENT 4

MANAGING PETROLEUM PRODUCTS* DURING TANK CLOSURES

WHAT IS IT? WHO REGULATES IT?

Product pumped to a maximum depth of 2" above the water level in the tank or 2" above the tank bottom whichever is higher. Bureau of Petroleum Products and Tanks (Department of Commerce)

Waste water, product-water interface, petroleum directly above product-water interface, sludge--anything below the 2" level. Department of Natural Resources

The Petroleum Inspection Program, under the authority of chapter 168 of Wisconsin's Statutes and chapter Comm 48 of Wisconsin's Administrative Code, has established the following requirements for petroleum products removed from underground storage tanks (USTs) at time of closure:

PRODUCT MAY BE

- Transferred only by a tank vehicle that complies with "Standards for Tank Vehicles for Flammable and Combustible Liquids."
- Returned to a terminal slop tank.
- Returned to a refiner.

TO USE THE PRODUCT, FOLLOW THESE GUIDES.

- Gasoline may be transferred to another retail facility.
- Gasoline storage must meet the standards established in chapter Comm 10 of Wisconsin's Administrative Code and the EPA rules.
- Gasoline may be treated as interface and blended with new gasoline at terminals or refineries at a blend rate not to exceed 1/2 of 1%.
- #1 oils must be downgraded to #2 fuel oil.
- Oils may be sold without blending for nonsensitive burner and heating use, but only to a qualified buyer/user established with the concurrence of the District Petroleum Inspection Office.
- Kerosene, #1 diesel, #2 diesel, #1 fuel oil, or #2 fuel oil may be blended with new #2 fuel oil up to a 50% rate and used or sold for heating purposes.
- Products heavier than #2 fuel oil may be blended with an equal or heavier stock at up to a 50% rate and used or sold for heating purposes.

When product quantities of 500 gallons or more are involved, contact a Department of Commerce (Commerce) District Petroleum Inspection Office. They may:

- a. Sample and test the product to determine compliance with chapter Comm 48 and then provide directions for disposition.
- b. Allow transfer of the product to another facility for use or sale.
- c. Classify the product as falling outside the scope of Comm 48.

*Any product regulated by the Department of Commerce under chapter Comm 48 – Petroleum Products.

ATTACHMENT 5

TRANSPORTING HAZARDOUS WASTE

To transport hazardous waste in Wisconsin you must:

* Obtain an I.D. Number from EPA using the Notification of Regulated Waste Activity Form 8700-12. To request a notification form, contact a Department of Natural Resources (DNR) Hazardous Waste Specialist or call (608) 266-2111.

* Obtain a hazardous waste transportation service license from the DNR. To request a transportation license application form, contact a Department Hazardous Waste Specialist or call (608) 266-2111.

Persons transporting hazardous waste into or through Wisconsin who are based in another state should submit a license application and fee to the DNR regional office where the transportation activity is concentrated or where the transporter enters Wisconsin.

The \$250 annual license fee covers the period from October 1 to September 30 and is required with each application. A \$150 late fee is assessed for late renewals.

* Only accept hazardous waste accompanied by a manifest that is properly signed by the generator (unless the waste was generated by a very small quantity generator who is not required to, and does not, manifest its waste). The transporter must ensure that copies of a manifest meeting the requirements of chapter NR 620, Wis. Adm. Code:

- a) Are signed by the generator.
- b) Are signed and dated by the transporter when the waste is accepted from the generator.
- c) Accompany the waste at all times.
- d) Are signed and dated by another transportation service that also transports the waste or by the facility indicated on the manifest that receives the waste.
- e) Are kept by the transporter for 3 years.

(NOTE: A manifest should not be used for shipments of only nonhazardous waste, except for PCB waste.)

If the transporter is unable to deliver the waste to the facility, alternate facility, or another transporter indicated on the manifest, the transporter must contact the generator for further directions. The transporter must then revise the manifest, obtain a second manifest, or return the waste to the generator.

* Properly package, label and mark the waste and placard the vehicle. Hazardous waste must be packaged according to the hazardous materials transportation requirements in 49 CFR Part 173. Hazardous waste must be labeled and marked, and vehicles must be placarded according to the hazardous materials transportation requirements in 49 CFR Part 172.

* First secure containerized waste in the vehicle to prevent movement.

* Properly train equipment operators. Each transportation service must have an employee training program for hazardous waste handling and equipment operators. Topics in the program must include the problems and potential hazards posed by the transportation and disposal of hazardous waste, and equipment inspection techniques. Training records must be kept for 3 years.

* Periodically inspect your equipment. Each transportation service must have an inspection program for hazardous waste handling and transportation equipment. The program must include a schedule for equipment inspection and a checklist of specific areas or items to inspect. Records of when the equipment was inspected, any problems observed, and any maintenance, must be kept for 3 years.

* Properly report and respond to hazardous waste discharges.

This summary of hazardous waste transporter requirements is based on guidance from the DNR for chapter NR 663, Wisconsin Administrative Code, effective August 1, 2006. For more details and verification of actual requirements, consult the code or contact the DNR Hazardous Waste Specialist for the county in which your site is located. Please note: requirements are slightly different for rail or water transport or when a transporter mixes wastes of different shipping descriptions.

What should be done if a discharge of hazardous waste occurs during transportation?

1. Call the Division of Emergency Government's 24-hour number: 800-943-0003.
2. Comply with the hazardous substance spill requirements in section 292.11, Wisconsin Statutes and chapter NR 706, Wis. Adm. Code.
3. Give notice as required by 49 CFR 171.15 to the National Response Center at (800) 424-8802.
4. Report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, U.S. DOT, Washington, D.C. 20590.
5. Remove, containerize, transport and dispose of spilled hazardous waste according to the hazardous waste management requirements in chapters NR 600 to 685, Wis. Adm. Code.

ATTACHMENT 6

TANK CLEANING AND HANDLING

Wisconsin's hazardous waste management regulations require that storage tanks be adequately cleaned before they are transported or cut up for scrap.

Why Must Tanks Be Cleaned Properly?

It is illegal to transport tanks containing residues (including petroleum residues) that are hazardous wastes, without a variance or emergency waiver from Department of Natural Resources (DNR) hazardous waste staff. Interstate carriers must obtain United States Department of Transportation approval to carry uncleaned tanks that have held hazardous materials. Improperly or inadequately cleaned tanks may pose a fire or explosion hazard through the production of vapors from sludge residues. Also, these residues may be hazardous due to their toxicity. Inadequate cleaning may prevent recycling of the tanks as scrap metal.

Before removing sludge, cleaning tanks, and transporting tanks, fill the tanks with inert gases or properly vent them in accordance with the Department of Commerce requirements to remove explosive vapors. Federal Occupational Health and Safety Administration (OSHA) confined space entry regulations may apply.

When Is a Tank Cleaned Adequately?

It is difficult to clean a tank so completely that no product or sludge remains on the inside surfaces. The objective of cleaning tanks is to minimize the risk of explosion, fire, or toxic substance release.

There is no widely-accepted standard for determining if a tank has been adequately cleaned. However, adhering to the methods described in the publications API 2015 (American Petroleum Institute, 2101 L Street, NW, Washington, D.C. 20037) or NFPA 327 (National Fire Protection Association, Batterymarch Park, Quincy, MA 02269) will produce a tank that can be recycled as scrap.

When a tank has been properly cleaned, an inspector should be unable to remove additional sludge or scale by wiping the inside surface of the tank with a rag or squeegee.

It is important to realize that even if a tank passes this "wipe test" it may contain sufficient traces of product to generate hazardous vapors. Therefore, cleaned tanks must be properly inerted or vented according to the standard procedures described in API 2015 or NFPA 327 before they are transported, cut apart or stored.

The materials collected during cleaning (rinsate and sludge) may be hazardous wastes. The generator of the waste (generally the owner of the contents of the tank) is responsible for determining if these materials are hazardous wastes. If they are, they must be stored, transported, and disposed of according to hazardous waste regulations. Details of Wisconsin's hazardous waste regulations may be obtained from the DNR Hazardous Waste Management program.

What Tank Cleaning Information Must Be Included in the Closure Assessment?

The closure assessment must state:

- (1) The method used for inerting the tank.
- (2) The method used for cleaning the tank (e.g., steam, water jet, chemical).
- (3) Who cleaned the tank.
- (4) The quantity of waste residue (sludge and rinsate) collected during cleaning.
- (5) How the waste residue was managed.
- (6) Where the tank or tank fragments were taken for disposal and the manner of disposal.

ATTACHMENT 7

METHANOL FIELD PRESERVATION FOR GRO SAMPLES - QUESTIONS AND ANSWERS

What is the methanol field preservation and when is it required?

Methanol field preservation involves placing soil samples in jars containing methanol or adding methanol to jars containing soil while at the sampling location. The methanol reduces volatilization and biodegradation of soil contaminants prior to lab analysis, thus giving more accurate sample results.

Is the methanol preservation necessary?

There is strong evidence that samples which are not preserved in the field underestimate the contamination present. Scientific data shows that losses of 30 percent or more are typical. This data is supported by field experience where screening, odor and staining of soils indicate that contamination was present, but lab samples showed no detect.

What is the procedure for preserving samples with methanol?

For samples collected for closure assessments (e.g., closure assessments for underground storage tanks), the Department of Natural Resources (DNR) recommends adding 25 gm of soil directly to a tared 60 ml jar containing 25 mls of purge and trap grade methanol. It is not advisable to weigh out exactly 25 gm of soil for each sample because this is a ballpark figure, and any agitation causes unnecessary volatilization. Instead, weigh out one 25 gm sample of site soil into an empty 60 ml jar, mark a fill line and use this jar as a model for collecting the actual samples. The maximum amount of soil that can be added to a 60 ml jar is 35 gm. If a 40 ml jar is used, the sampler should add a maximum of 20 gm of soil and 20 mls of methanol.

For samples collected for LUST investigations, the DNR recommends adding the methanol to the soil because many samplers use field screening to identify samples for analysis, and soil samples preserved in methanol are a hazardous waste unless analyzed by a laboratory. Collect 2 samples at each sample location, one for field screening and one for potential laboratory analysis. Place 25 grams of soil in an empty, tared 60 ml VOC vial for potential lab analysis (20 gm maximum for a 40 ml vial). Cap the vial and place on ice while conducting field screening of the other co-located sample. Collecting soils into an intermediate container and subsampling after screening has been done is not acceptable. After completing field analysis of all samples, select the co-located laboratory samples that should be analyzed based on the field screening results.

There are three ways to add methanol to the soil. The first two involve the use of a glass syringe and non-coring syringe needle to transfer the methanol from a septa vial containing purge and trap grade methanol to the sample vial. Both require the sampler to use a fresh syringe needle for each sample to avoid cross contamination. The first method requires loosening the cap to relieve pressure buildup from the methanol addition. The second method is to use a smaller sample size and less methanol to overcome sample pressurization. All samples must maintain a 1:1 ratio of milliliters (ml) of methanol to grams. DNR recommends using 10 gm soil and 10 ml of methanol, but the laboratory analyzing the samples should approve the sample size. It is also possible to remove the cap and add the methanol directly to the jar. However, this method increases the potential for volatilization, cross contamination, and spillage. Add the methanol to samples within 2 hours of collection. Samples should be returned to an iced cooler immediately after preservation. Samples may be preserved by the laboratory only if they are received by the lab within 2 hours of collection.

How can I dispose of soil samples that aren't sent in for analysis?

Soil preserved in methanol is a hazardous waste. Soil samples are exempt from hazardous waste regulations if they are analyzed at a laboratory. Any samples that are not analyzed are hazardous waste and the generator is legally responsible for proper disposal. In general, do not collect and preserve excess samples, and if you collect and preserve a sample, have it analyzed.

What can be done to insure personal safety while handling the methanol?

Do not store the methanol in a hot place. On hot days, carry the methanol samples in your sample cooler prior to sample collection. Beware of pressure buildup in heated sample jars containing methanol. Avoid inhaling the methanol vapors. Work quickly while filling sample jars to minimize your exposure to the methanol. Open only one methanol vial at a time. Do not handle methanol in an unventilated area. If you are preserving samples inside a vehicle in inclement weather, make sure to provide some ventilation.

What is a dry-weight sample and how many do I have to collect?

A dry weight sample is simply a jar filled with dirt that is required by the lab to calculate the percent moisture of the soil at the sampling location. Dry weight samples should be tightly sealed to prevent loss of soil moisture but, since they are not analyzed for contaminants, they do not require special preservation. You need to collect a dry-weight sample for each sampling location at the site.

How can I avoid cross-contamination?

Site assessors should not handle petroleum products prior to sample collection. Wash your hands after filling your car with gas. Under no circumstances should methanol sample jars be stored with gasoline (e.g. with a gas can in the trunk of a car). Tank removers doubling as site assessors should wear coveralls during tank removal and take them off before sampling. Vehicle exhaust and ambient gasoline vapors are another potential source of cross contamination. Quickly open, fill, and reseal methanol sample jars. Low concentrations of ambient vapors can be monitored with a PID. Contamination from other samples and sample breakage are other potential sources. Put each sample in a separate freezer bag.

What are the consequences of spilling methanol?

If methanol is spilled from vials before or after sample collection the lab results will be skewed and incorrect. When a small amount of methanol is spilled during the sampling process, it is necessary to resample using a fresh vial. If methanol is spilled during shipping to the laboratory, the DNR will ask for resampling.

Will rain water entering the sample jar affect the results?

It may. Do not allow rain water to enter a sample jar. Suspend sampling if it is raining hard.

How should I ship the jars to the lab?

Methanol must be shipped in accordance with the attached shipping instructions. To pack the jars in an absorbent material and still keep them on ice, place the jars in an insulated cooler with ice or other coolant and then place the cooler in a slightly larger cardboard box. Fill the space between the cooler and the box with the absorbent material (e.g. vermiculite).

Is there a shelf-life for unused methanol jars?

The shelf-life may be specified by the lab providing the jars, and could be 15-30 days.

What companies provide jars containing methanol and other equipment?

Tared sample jars containing methanol should be obtained from the laboratory that will perform the analysis. A list of commercial labs certified for VOC analysis is available from the DNR at the address shown in the references.

ATTACHMENT 8

SHIPPING METHANOL

The Wisconsin Department of Natural Resources' "Modified GRO Method for Determining Gasoline Range Organics" requires laboratories and samplers to ship sample vials with small amounts, (25 mls), of methanol for in field preservation of samples.

Methanol is considered a hazardous material by the U.S. Department of Transportation. Methanol shipments must follow Title 49 of the Code of Federal Regulations (49 CFR). However, methanol shipped in small amounts qualifies for a small quantity exemption (section 173.4).

Title 49 CFR is a lengthy document. The following is a summary of the requirements for shipping samples. Consultants and laboratories should refer to the code for a complete review of the requirements.

- 1) Maximum volume per vial is 30 mls.
- 2) A vial must not be full (of methanol).
- 3) Vials must be securely packed with cushioning and surrounded by an absorbent material such as vermiculite.
- 4) Packaging must be strong enough to hold up to the intended use, (see specifications in 173.4 6i).
- 5) The maximum package weight is 65 pounds.
- 6) The package must be marked with the following statement:

"This package conforms to conditions and limitations specified in 49 CFR 173.4"

Refer to section 173.4 of Title 49 CFR for detailed information on these requirements. In addition, it would be prudent to mark these packages with the words "THIS SIDE UP" and arrows, in case the vials are improperly sealed.

If the methanol has leaked from the vials in transport to the lab the, Department of Natural Resources or the Department of Commerce will ask for resampling.

ATTACHMENT 9

GEOGRAPHIC REFERENCING USING THE PUBLIC LANDS SURVEY SYSTEM

The public lands survey system (PLS) is a system of land surveying established by the United States Government in the 19th century. It is one of the most Common systems of geo-referencing in use in Wisconsin and is the easiest system to learn for the purpose of providing the legal description of the site location for underground storage tank closure assessments.

The parts of the reference system from largest to smallest are the township, range, section, quarter section, and quarter-quarter section. A **township** is a 6-mile by 6-mile square of land. The land area of Wisconsin, which is approximately 325 miles long and 300 miles wide, contains over 400 townships. Townships are identified using the PLS reference system, which is similar to a Cartesian coordinate system. In the PLS system, the “x-axis” (east-west) is the **town base** line and the “y-axis” (north-south) is the fourth principal **meridian**. Any township in Wisconsin can be identified using an ordered pair consisting of a township number and a range number. Township numbers are not unique to a particular township. For example, 50 different townships can have the same township number. Only the combination of a township number and range number uniquely identifies a township.

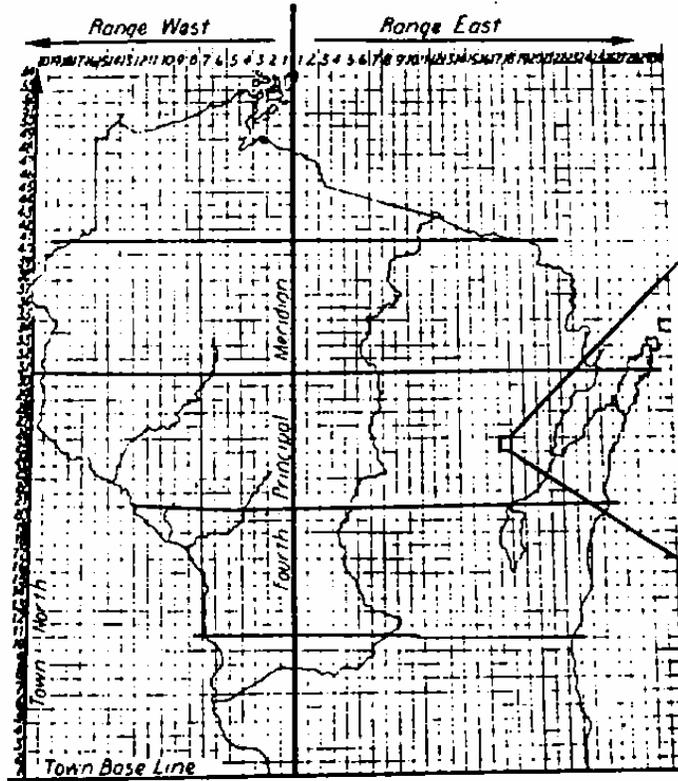
Townships north of the town base line are followed by an N and townships south of it are followed by an S. Since all townships in Wisconsin are north of the town base line, all Wisconsin township numbers are followed by an N. Townships east of the fourth principal are followed by an E and townships west of it are followed by a W. For example, T1N R2W designates the township in Grant county occupied by the southwestern-most corner of Wisconsin. T34N R30E designates the township in Door county occupied by the northeastern tip of Washington Island. Note that, although the town base line runs east-west, township numbers change in the north-south direction. Similarly, although the fourth principal meridian runs north-south, the range numbers change in the east-west direction.

Sections are 1-mile by 1-mile squares of land. Each township contains 36 sections. The sections are numbered in a standard zig-zag order, which was used by field crews conducting traverses. The sections are further divided into **quarters** and **quarter-quarters** (i.e. sixteenths). The four quarters are referenced using the four corners of the compass: northeast (NE), southeast (SE), southwest (SW), and northwest (NW). A quarter-quarter is referenced by first identifying the quarter within which it lies and then referencing the four corners of the compass again. For example, **X** in the figure is in the NW quarter-quarter of the SE quarter of section 21. **O** in the figure is in the SE quarter-quarter of the NW quarter. It is possible to further subdivide quarter-quarters into quarter-quarter-quarters following the same pattern. The length of a quarter-quarter-quarter is 1/16 of a mile or 330 feet. In summary, the legal description of **X** is NW 1/4, SE 1/4, Section 21, T25N, R17E

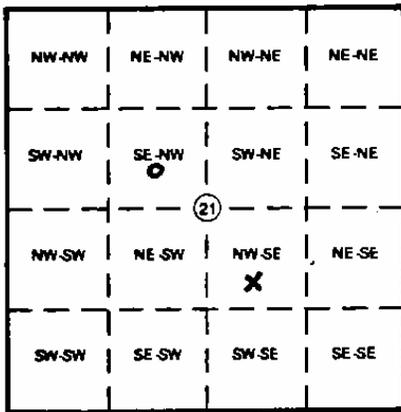
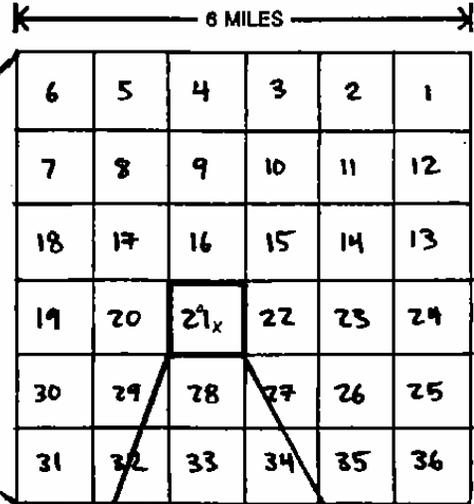
The legal description of a particular site can be determined by locating the site on a United States Geologic Survey topographic map or a plat book. USGS maps can be purchased from the USGS as well as from the Wisconsin Geologic and Natural History Survey (WGNHS) in Madison. Plat books can be purchased from Rockford Map Publishers and are available for viewing at most libraries and town halls.

Note: it is not necessary to provide detailed metes and bounds to satisfy the legal description requirement (e.g. **PTNE 1/4 SEC 7 T7N R20E** COM E1/4 COR NO 44'E 832.68 FT THE BGN NO 44'E 505 FIP N89 23'W 189.86 FT S61 01'W 210 FTS51 33'W 150 FT S28 58'E 387.81, etc.) However, such descriptions do provide all or part of the necessary information (shown in bold).

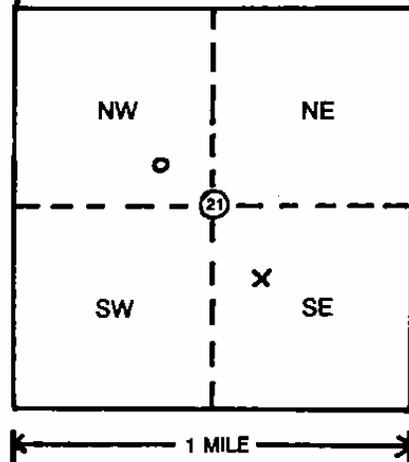
WISCONSIN



TOWNSHIP T25N R17E



SECTION 21



SECTION 21

Complete One Form for Each System Service Event

TANK SYSTEM SERVICE AND CLOSURE ASSESSMENT REPORT

RETURN COMPLETED CHECKLIST TO:

The information you provide may be used for secondary purposes [Privacy Law, s.15.04 (1) (m), Wis. Stats.]

CHECK ONE:
 UNDERGROUND
 ABOVEGROUND

Wisconsin Department of Commerce
 ERS Division
 Bureau of Petroleum Products and Tanks
 P.O. Box 7837
 Madison, WI 53707-7837

FOR PORTIONS OF THE FORM THAT DO NOT APPLY, CHECK THE 'N/A' BOX

Part A – To be completed by contractor performing repair or closure

A. TYPE OF SERVICE CLOSURE REPAIR/UPGRADE CHANGE IN SERVICE

Indicate portion of system being serviced if a repair, upgrade or change in service is being performed

- Remote fill Tank Piping Transition/containment sump Spill bucket Dispenser

B. IDENTIFICATION (Please Print)

1. Site Name		2. Owner Name	
Site Street Address (not P.O. Box)		3. Contact Name Job Title	
Municipality		Contact Mailing Address	
<input type="checkbox"/> City <input type="checkbox"/> Village <input type="checkbox"/> Town of:		Municipality	State Zip Code
Zip Code	County	County	Telephone No. (include area code) ()
4. Primary Service Contractor Section A above		Service Contractor Street Address	
Service Contractor Telephone No. (include area code) ()		Service Contractor City, State, Zip Code	

C. TANK SYSTEM DETAIL (Complete for all service activities)

a	b	c	d	e	f	g	h	
Tank ID #	Type of Closure ¹	Tank Material of Construction	Piping Material of Construction	Tank Capacity (gallons)	Contents ²	Release - System Integrity Compromised (e.g. holes, cracks, loose connection, etc)?	If "Yes" to "g", Then Specify Source & Cause of Release ⁵	
						<input type="checkbox"/> Y <input type="checkbox"/> N	Source of Release ³	Cause of Release ⁴
						<input type="checkbox"/> Y <input type="checkbox"/> N		
						<input type="checkbox"/> Y <input type="checkbox"/> N		
						<input type="checkbox"/> Y <input type="checkbox"/> N		
						<input type="checkbox"/> Y <input type="checkbox"/> N		
						<input type="checkbox"/> Y <input type="checkbox"/> N		

1. Indicate type of closure: P = Permanent, TOS = Temporarily Out-of-Service, CIP = Closure In-Place
 2. Indicate type of product: DL = Diesel, LG = Leaded Gasoline, UG = Unleaded Gasoline, FO = Fuel Oil, GH = Gasohol, AF = Aviation Fuel, K = Kerosene, PX = Premix, WO = Waste/Used Motor Oil, FCHZW = Flammable/Combustible Hazardous Waste, OC = Other Chemical (indicate the chemical name(s))

CAS number(s): _____

3. Source of release: T = tank, P = piping, D = dispenser, STP = submersible turbine pump, DP = delivery problem, O = other
 4. Cause of release: S = spill, O = overflow, POMD = physical or mechanical damage, C = corrosion, IP = installation problem, O = other
 5. Has release been reported to the Department of Natural Resources? Yes No Release not evident at this time

D. CLOSURES (Check applicable box at right in response to all statements in section D)

Written notification was provided to the local agent 15 days in advance of closure date. Y N
 All local permits were obtained before beginning closure. Y N NA
 UST Form ERS-7437 or AST Form ERS-8731 filed by owner with the Dept. of Commerce indicating closure. Y N NA
NOTE: TANK INVENTORY FORM ERS-7437 or ERS-8731 SIGNED BY THE OWNER MUST BE SUBMITTED WITH EACH CLOSURE or CHANGE-IN-SERVICE CHECKLIST

D.1 TEMPORARILY OUT-OF-SERVICE

	Remover Verified	Inspector Verified	NA
1. Product removed.			
a. Product lines drained into tank (or other container) and liquid removed, and	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
b. All product removed to bottom of suction line, OR	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
c. All product removed to within 1" of bottom.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
2. Fill pipe, gauge pipe, tank truck vapor recovery fittings, and vapor return lines capped.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
3. All product lines at the islands or pumps located elsewhere are removed and capped, OR	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
4. Dispensers/pumps left in place but locked and power disconnected.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>

5. Vent lines left open.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
6. Inventory form filed indicating temporarily out-of-service (TOS) closure.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>

D.2. CLOSURE BY REMOVAL OR IN-PLACE

1. General Requirements

a. Product from piping drained into tank (or other container).	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
b. Piping disconnected from tank and removed.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
c. All liquid and residue removed from tank using explosion-proof pumps or hand pumps.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
d. All pump motors and suction hoses bonded to tank or otherwise grounded.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
e. Fill pipes, gauge pipes, vapor recovery connections, submersible pumps and other fixtures removed.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
f. Vent lines left connected until tanks purged.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
g. Tank openings temporarily plugged so vapors exit through vent.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
h. Tank atmosphere reduced to 10% of the lower flammable range (LEL) - see Section E.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>

2. Specific Closure-by-Removal Requirements

a. Tank removed from excavation after PURGING/INERTING ; placed on level ground and blocked to prevent movement.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
b. Tank cleaned before being removed from site.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
c. Tank labeled in 2" high letters after removal but before being moved from site.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
NOTE: COMPLETE TANK LABELING SHOULD INCLUDE WARNING AGAINST REUSE; FORMER CONTENTS; VAPOR STATE; VAPOR FREEING TREATMENT; DATE.			
d. Tank vent hole (1/8" in uppermost part of tank) installed prior to moving the tank from site.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
e. Site security is provided while the excavation is open.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>

3. Specific Closure-In-Place Requirements

NOTE: CLOSURES IN-PLACE ARE ONLY ALLOWED WITH THE PRIOR WRITTEN APPROVAL OF THE DEPARTMENT OF COMMERCE OR LOCAL AGENT.

a. Tank properly cleaned to remove all sludge and residue.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
b. Solid inert material (sand, cyclone boiler slag, or pea gravel recommended) introduced and tank filled.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
c. Vent line disconnected or removed.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>
d. Inventory form filed by owner with the Department of Commerce indicating closure in-place.	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/>

E. REPAIR, UPGRADE OR CHANGE IN SERVICE

Written notification was provided to the local agent 15 days in advance of service date. Y N NA
 All local permits were obtained before beginning service. Y N NA
 Form ERS-7437 or ERS-8731 filed by owner with the Department of Commerce indicating change in service. Y N NA

F. METHOD OF VAPOR FREEING OF TANK

- Displacement of vapors by eductor or diffused air blower.
 Eductor driven by compressed air, bonded and drop tube left in place; vapors discharged minimum of 12 feet above ground.
 Diffused air blower bonded and drop tube removed. Air pressure not exceeding 5 psig.
- Inert gas using dry ice or liquid carbon dioxide.
- Inert gas using CO₂ or N₂ **NOTE: INERT GASSES PRODUCE AN OXYGEN DEFICIENT ATMOSPHERE. LEL METERS MAY NOT FUNCTION ACCURATELY. THE TANK MAY NOT BE ENTERED IN THIS STATE WITHOUT SPECIAL EQUIPMENT.**
 Gas introduced through a single opening at a point near the bottom of the tank at the end of the tank opposite the vent.
 Gas introduced under low pressure not to exceed 5 psig to reduce static electricity. Gas introducing device grounded.
- Readings of 10% or less of the lower flammable range (LEL) or 0% oxygen obtained before removing tank from ground.
- Tank atmosphere monitored for flammable or combustible vapor levels prior to and during cleaning and cutting.
- Calibrate combustible gas indicator and/or oxygen meter prior to use. Drop tube removed prior to checking atmosphere. Tank space monitored at bottom, middle and upper portion of tank.

G. REMOVER/CLEANER INFORMATION

Remover/Cleaner Name (print) _____ Remover/Cleaner Signature _____ Certification No. _____ Date Signed _____
 I attest that the procedures and information which I have provided as the tank closure contractor are correct and comply with Comm 10.
 Company expected to perform soil contamination assessment _____

H. INSPECTOR INFORMATION

Inspector Name (print) _____ Inspector Signature _____ Inspector Cert # _____ LPO Agency #: _____
 FDID # For Location Where Inspection Performed _____ Inspector Telephone Number _____ Date Signed _____

Part B – To be completed by environmental professional

I. TANK-SYSTEM SITE ASSESSMENT (TSSA)

Site Name: _____ **Address:** _____

To determine if a TSSA is required, see Comm 10 and section II part B of *ASSESSMENT AND REPORTING OF SUSPECTED AND OBVIOUS RELEASES FROM UNDERGROUND AND ABOVEGROUND STORAGE TANK SYSTEMS*.

If a TSSA is required, then follow the procedures detailed in *ASSESSMENT AND REPORTING OF SUSPECTED AND OBVIOUS RELEASES FROM UNDERGROUND AND ABOVEGROUND STORAGE TANK SYSTEMS*.

1. Site Information

a. Has there been a previously documented release at this site? Y N

If yes, provide the Commerce # _____, or DNR BRRT's # _____.

b. Number of active tanks¹ at facility prior to completion of current services USTs _____ ASTs _____.

(NOTE 1: Do not include previously closed systems or system components.)

c. Excavation/trench dimensions (in feet). (Photos must be provided.)

EXCAVATION/TRENCH #	LENGTH	WIDTH	DEPTH

2. Visual Excavation/Trench Inspection (Photos must be provided for "Yes" responses, except item b.)

Do any of the following conditions exist in or about the excavation(s)?

a. Stained soils: Y N b. Petroleum odor: Y N c. Water In excavation/trench: Y N

d. Free product in the excavation/trench: Y N e. Sheen or free product on water: Y N

3. Geology/Hydrogeology

a. Depth to groundwater _____ feet b. Indicate type of geology² _____

(Note 2: Use these symbols individually or in combination as appropriate: C = Clay, SLT = Silt, S = Sand, Gr = Gravel)

4. Receptors

a. Water supply well(s) within 250 feet of the facility? Y N If yes, specify _____

b. Surface water(s) within 1000 feet of the facility? Y N If yes, specify _____

5. Sampling

a. Follow the procedures detailed in *ASSESSMENT AND REPORTING OF SUSPECTED AND OBVIOUS RELEASES FROM UNDERGROUND AND ABOVEGROUND STORAGE TANK SYSTEMS*.

b. Complete Tables 1 and 2 as appropriate. (Attach chain-of-custody and laboratory analytical reports.)

c. Attach a detailed map of site features and sample locations.

J. NOTE RELEVANT OBSERVATIONS, SPECIFIC PROBLEMS OR CONCERNS BELOW
