Part 4
Closure Release & Investigations Unit

- Closure Notices
- Closure Reports
- Closure Inspections
- Phase II Environmental Site Assessments
- Suspected & Confirmed New Releases

Part 4
Tank Closures

- Processing Closure Notices
- Tracking Open Closure Notices
- Reviewing Closure Reports
- Preparing Correspondence
- Data Entry into Database

Processing Closure Notices

- O/o are required to notify DNR 30 days prior to closure of USTs
- Check Database to make sure the tank information matches up
- Approve or deny within 5 Days of receipt
- Stamp approved and send a copy back to RP, direct original to ST file, update database

Open Closure Notices

- **If no report after 180 days- will send follow up letter**
- **If tank(s) not yet closed but they still intend to/ must resubmit closure notice**

Out of Use Tanks

- Tanks must be emptied (<1 inch fuel)
- Steel tanks & lines must maintain cathodic protection
- Leave vent lines open & functioning
- Cap and secure other lines (fill ports)
- Within 1 year, must conduct a site assessment
- Within 5 years, must bring UST back into service or permanently close

Oversight of Closure Activities

- The Tanks Section tries to attend as many Tank closures as possible, so we ask that the O/O notify DNR within 3 days of beginning closure activities

Review of Closure Reports

- Closure reports are due within 60 days of completion of closure activities
- Narrative
- Site Maps
- Color Photographs
- Laboratory Data
- Disposal/Cleaning Documentation
- Tanks and Tank Cleaning
- Soil and Water Disposal

Closure - Narrative

- Narrative with timeline of site activities
- Clearly state site cleanup target levels
- Product recovered & disposal
- Number of tanks removed and their observed condition
- Number of tanks left in place
- Planned future use of site

Closure - Narrative (continued)

- Are new tanks to be installed onsite?
- Amount of backfill and native soil removed and its fate
- Concrete pad in pit? Its condition?
- Groundwater in pit? Removed? Recharged within 12 hours?
- Bedrock present?

Closure - Maps

- Drawn to scale
- North arrow
- Current onsite buildings
- Area land uses
- Location of tanks, excavation boundaries, product lines, dispenser islands
- Depth of excavation
- Underground utilities
- Downgradient direction and degree of slope
- Locations of all soil samples collected

Closure Reports – Color photos

- Photos from before excavation
- Ends and sides of all tanks
- Cleaned interior of tanks
- Tank pit floor and sidewalls
- Product line and dispenser trenches
- Tank pad if present
- Bedrock if exposed
- Sealed USTs/lines that are closed in place
- Site after completion of closure
- All photos need to be properly labeled

Closure Reports – Lab Data

- Analytical results
- Sample results for all appropriate COC's (Table 5-1)
- If TPH-DRO or -ORO detected, 25% (or min. of two, whichever is greater) of samples w/ highest concentrations must be analyzed for PAHs (Tech. Bulletin 2160).
- Samples of soil returned to the pit/excavation
- Samples of soil removed for disposal
- Background sample results if claiming Lead concentrations are due to background
- QA/QC documentation

Closure Report – Lab Data

- A complete chain of custody – check sample temperature & turn around times
- Laboratory reporting limits must meet the Required Reporting Limits as outlined in Table 5-3 of the MRBCA guidance document
- All appropriate QA/QC must be documented

Closure Report – Tank Cleaning

- Photographic documentation and a signed statement by the party performing tank cleaning activities attesting to the proper cleaning of the tanks
- A signed statement by the UST owner or the owner/operator of the receiving facility attesting to the fate of the USTs
- Documentation on the fate of any usable product recovered from the USTs
- Proper characterization of the sludge/rinsate generated during tank cleaning activities as well as the appropriate manifest(s) signed by the generator, transporter, and receiving facility of the waste

Closure Report – soil & water disposal

- Documentation of the proper disposal of contaminated soil (e.g. landfill disposal receipts, weight tickets)
- Documentation of the proper disposal of contaminated pit water, including: Signed statement of permission from the POTW prior to disposal, documentation of wastewater characterization required by the POTW, and appropriate documentation that the wastewater was accepted by the POTW

Closure Reports - Other

- If bedrock is encountered in the excavation, a geologic assessment must be performed by a registered geologist or a qualified professional engineer (Section 4.4.2.4)

Other

- If the cleanup target levels are above the Default Target Levels, the domestic use of groundwater pathway must be evaluated in strict accordance with Sect. 6-3 and Fig 6-2
- If non-residential cleanup target levels are used, documentation on the reasonably anticipated future use of the site must be submitted

Pre-closure Characterization

- In some cases, the tank owner might benefit from conducting investigations and evaluating the DU pathway and RAFU prior to beginning closure activities
  - Determines whether release has occurred
  - Allows determination of cleanup standards and estimation of area exceeding standards prior to digging
  - Can allow for all necessary actions - closure and remediation - during one mobilization
  - At the discretion of the Tank Owner
  - Potentially saves time and money

Updating Database

- Update Tanks tab to reflect change in status
- Update Closure tab to reflect receipt of closure notice & closure report and issuance of NFA, if appropriate
- Submit a form to open a new Release site for sites with contamination
- Transfer to Remediation units if contamination > cleanup & all other closure documentation requirements are met.

Phase II ESAs

- Submit form to Create new Release file
- Request work plan for Site Characterization (SC)
- Review & approve work plans for SC
- Transfer site to Remediation Unit

Confirmed New Releases

- Compliance/Inspection group receives notifications of Suspected releases
- Closure unit will coordinate to determine if release got out of containment or has been adequately remediated
- If confirmed release has not been adequately addressed, Closure Unit will open a release site and request a work plan for SC.

Emergency Response Coordination

- Coordinate with the EER staff on releases that are posing an immediate threat
- Open a new release file
- Direct the responsible party to submit a work plan for site characterization
- Transfer site to Remediation Unit

Break