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## NOTIFICATION AND SOIL SAMPLING REQUIREMENTS for REMOVAL of UNDERGROUND STORAGE TANK SYSTEMS

Effective Date: October 1, 2012

The Department of Natural Resources and Environmental Control, Tank Management Section (DNREC-TMS) has developed this guidance sheet to assist tank owners, operators, and contractors in complying with DE Admin. Code 1351, Delaware's *Regulations Governing Underground Storage Tank Systems* (the UST Regulations) Part A, Section 4.1.6. and 4.8.; Parts B and C, Section 4.; and Part D, Section 3., when removing tanks. This is guidance only, the DNREC-TMS may impose additional requirements when deemed necessary.

#### **NOTIFICATION**

- 1. A completed UST Closure Notification Form must be received by the DNREC-TMS office ten (10) days prior to the removal date given on the form. The tank *may not* be removed unless the DNREC-TMS has received the notification form as required in the UST Regulations, Part A, Section 4.8.1. A *Confirmation of Scheduled Tank Work* form will be faxed or emailed to the UST contractor upon approval of the notification form.
- 2. UST Closure Notification forms will not be accepted if a date of removal is not indicated. Include a tentative date at a minimum.
- 3. If the actual date of the removal changes from the date noted on the notification form, the contractor or owner or operator must give the DNREC-TMS at least two (2) days notice prior to the new removal date. This notification may be done by telephone: (302) 395-2500 or fax: (302) 395-2555. The new date must be approved and confirmed by the DNREC-TMS via a faxed or emailed *Confirmation of Scheduled Tank Work* form to the contractor.
- 4. When prior approval is requested for a deviation from the soil sampling recommendations in this guidance a site map showing all tanks, dispensers, vents, lines and the dimensions of the tank(s) must be submitted with the notification. The DNREC-TMS will review this information and use it to determine the number of soil samples necessary to characterize the site.
- 5. For notification forms received more than thirty (30) days prior to the removal, the DNREC-TMS must be notified again ten (10) days before the removal actually occurs, unless prior approval is given. This may be done by telephone: (302) 395-2500 or fax: (302) 395-2555.

#### SOIL SAMPLING REQUIREMENTS for UST REMOVAL

You must receive approval **in advance**, from the DNREC-TMS, for **any** deviation from these requirements. Requests for deviation must be written, including reason for deviation and a sketch showing proposed sampling locations.

#### SOIL SAMPLING PROTOCOL

#### **Composite Soil Sampling**

At least one composite soil sample per tank must be collected by taking several discrete samples from the soil disturbed by excavation around each individual UST being removed (*Fig. 1.*), and mixing them together. Soil samples should be field screened and samples collected from the area where the contamination appears to be the greatest. To prevent volatilization of any contamination, composite samples should be collected as soon as backfill materials surrounding the tank are excavated. The number of required composite soil samples per tank is described in *Table 1*.

#### **Grab Soil Sampling**

Grab soil samples must be collected from specific spots along the sides or bottom of the tank excavation, below the product dispensers, and occasionally within piping runs, per the diagram below (Fig. 1.). The location of the grab samples depends on the elevation of the water table and the presence of contamination, i.e. staining. Samples must be collected from the area where the contamination appears to be the greatest. To prevent volatilization of any contamination, grab samples should be collected as soon as the sample locations become accessible. The number of required grab soil samples per tank is described in Table 1.

#### **Tanks Above the Water Table**

If groundwater is not present in the tank pit following tank removal grab samples must be collected at an elevation equal to two (2) feet below the bottom of the tank with preference given to areas with obvious staining. (Fig.1)

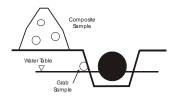
- At least one grab sample must be collected at the product piping connection (submersible pump end).
- If contamination is evident, the remaining samples must be collected from the areas where the contamination appears to be the greatest.
- If no contamination is evident, the remaining samples must be collected at intervals evenly spaced along the center line of the former tank location within the pit.

# Composite Sample

#### **Tanks Below the Water Table**

If the tank was submerged (i.e. groundwater is present in the tank pit following tank removal), grab samples must be collected from the pit wall at the soil/groundwater interface with preference given to areas with obvious staining. (Fig. 1)

- At least one grab sample must be collected from the sidewall nearest the product piping connection (submersible pump end).
- If contamination is evident, the remaining samples must be collected from the area of the sidewalls where contamination appears to be the greatest. Remaining samples must be collected from any area of the sidewall where staining is evident, or evenly spaced around the perimeter of the pit.
- If no staining is evident, the remaining grab samples must be evenly spaced around the perimeter of the pit.



#### **Below Product Dispensers**

If the product dispenser(s) are beyond the tank field area, one grab sample per dispenser must be collected from an elevation of five (5) feet below each dispenser or at the top of the water table, whichever is encountered first. If the product dispensers are within the tank field area, additional grab samples are not required (*Fig. 1.*).

#### Piping Run Sampling – Piping includes product, vent, vapor return and remote fill piping.

For Piping installed prior to January 1, 1999 where closure-in-place of a piping run is performed, sampling is required.

For the purpose of this Guidance "closure-in-place of a piping run" includes any closure operations which involve pulling or lifting the piping out of an unexposed or unexcavated trench, or leaving the piping in place, as they do not allow for a thorough inspection and evaluation of the soil conditions in the vicinity of the piping. You are required to contact the DNREC-TMS in advance and obtain approval for a piping sampling plan.

For piping runs removed from the ground via trenching so that soil conditions beneath the piping can be evaluated, sampling will only be required from areas of the piping trench with observable staining or evidence of a release.

For Piping *installed after January 1, 1999* where closure-in-place of a piping run is performed, **sampling is <u>not</u> required** unless there is observable staining or evidence of a release.

TABLE 1.

REQUIRED NUMBER OF SOIL SAMPLES by TANK CAPACITY

UST Capacity (gallons)	# of Samples per Tank*		
0 - 1,100	1 grab & 1 composite/tank		
	plus		
	Dispenser & Piping Run samples		
1,101 – 30,000	2 grabs & 1 composite/tank		
	plus		
	Dispenser & Piping Run samples		
30,001 – above	Call DNREC-TMS		
Compartmentalized USTs	Call DNREC-TMS		

<sup>\*</sup>See Figure 2

#### QA/QC PROTOCOL

All samples must be submitted in clean sealed containers provided by the analytical laboratory and kept at

 $\leq$  6°C until delivered to the laboratory for analysis. The laboratory must receive samples within twenty-four (24) hours of collection. If sample delivery within twenty-four (24) hours is not possible (for example, samples are collected late on a Friday after the laboratory is closed) proper storage of the samples must be documented on the chain of custody form. A chain of custody form must be maintained at all times for all samples and submitted to the DNREC-TMS.

For sampling events where volatile organic compounds (BTEX, GRO, EDB, EDC, MTBE, etc.) are to be analyzed, a trip blank must accompany the cooler from pickup to delivery. The trip blank must be analyzed for the same volatile organic compounds as the collected soil samples.

For sampling events where volatile organic compounds are to be analyzed, methanol preservation or Encore<sup>TM</sup>® sampling must be conducted. Note: Encore<sup>TM</sup>® Samplers **should not** be used when sampling pea gravel. When sampling pea gravel, methanol preservation of the sample in the field is required. Coordinate with your laboratory in advance to determine best sample volume and appropriate bottleware size for representative samples and ease of sample collection.

To minimize the risk of cross-contamination the use of disposable/dedicated sampling equipment is highly recommended when collecting samples. If reusable sampling equipment is preferred, proper decontamination procedures must be employed. The collection of an equipment blank is recommended, not required, when reusable/non-dedicated sampling equipment is used.

To maintain sample integrity, a DNREC-TMS Representative on-site may apply a custody seal to the sample container at the time of sample collection. If the seals are applied a separate chain-of-custody will be provided. This chain of custody must accompany the sample to the laboratory and a copy must be returned to the DNREC-TMS along with the sample results. If a sample is received by the laboratory with a damaged custody seal the DNREC-TMS may not accept the sample results and will request additional samples be collected.

Call the DNREC-TMS for more specific information about sampling methods, including proper procedures to assure QA/QC of samples and decontamination of tools.

#### REPORTING REQUIREMENTS

- 1. Site Map noting the sample locations.
- 2. Results of the soil sample analyses with chain-of-custody.
- 3. Custody seal chain-of-custody, if applicable.
- 4. All appropriate disposal documentation (e.g. disposal of product, sludge)
- 5. If sampling deviation is approved in the field an amended UST Closure Notification form must be submitted. The name of the DNREC-TMS project officer who approved the deviation must be clearly indicated and the sampling locations must be noted on the site map.

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The required documentation must be forwarded to the DNREC-TMS within sixty (60) days of the tank removal activity. The sample results must be labeled with the full site name, address, and date of the removal. It is the responsibility of the owner and operator or designated representative to provide all necessary information to the DNREC-TMS.

#### ANALYTICAL PARAMETERS

All soil samples from petroleum tanks must be analyzed according to the following **DERBCAP Tier 0** table below:

	Tier 0 Action	G II	Kerosene /	Diesel/ Heating	Used	Aviation	New Oil	Heavy	0.1
Analyte	Level	Gasoline	Jet Fuels	Fuels	Oil <sup>1,2</sup>	Gas		Oils	Other
	Benzene 230 ppb, Total BTEX 10								
BTEX <sup>5, 7</sup>	ppm	X	X		X	X			
GRO <sup>7</sup>	100 ppm	X	X		X	X			
DRO	1000 ppm		X	X	X		X		
HRO	Site by Site				X		X	X	
Lead, EDB <sup>7</sup> , EDC <sup>7</sup>	400 ppm, 10 ppb, 400 ppb	$X^4$			X	X			
MTBE <sup>3, 7</sup>	130 ppb	X	X		X	X			
Ethanol <sup>7,8</sup>	None	X							
Other <sup>6</sup>	Site by Site								$X^6$

#### Footnotes:

- 1. Used oil as defined in the Delaware Regulations Governing Underground Storage Tank Systems, Part A, Section 2. and the Delaware Regulations Governing Hazardous Waste.
- 2. Used oil USTs may also be required to analyze for metals, volatiles, semi-volatiles or any other analyte as required on a site specific basis depending on the tank contents. Contact the DNREC-TMS for determination.
- 3. MTBE analysis is required, unless conclusive documentation is submitted and pre-approved by the DNREC-TMS that no portion of the tank system was in service after January 1, 1978.
- 4. For gasoline USTs only, Lead, EDB and EDC analysis is required, unless conclusive documentation is submitted and pre-approved by the DNREC-TMS documenting that all portions of the tank system were installed after January 1, 1996.
- 5. In addition to total BTEX, benzene must be reported separately.
- 6. If the tank system contained anything other than petroleum products or if the tank system contained Racing Fuel, contact the DNREC-TMS for information on sampling procedures and analytical requirements prior to any on site activities.
- 7. Samples collected for the analysis of volatile organic compounds must be preserved with methanol. Encore<sup>TM</sup>® samplers are acceptable provided the preservative is methanol. Note: Encore<sup>TM</sup>® Samplers should not be used when sampling pea gravel. When sampling pea gravel, methanol preservation of the sample in the field is required.
- 8. Ethanol analysis is required, unless conclusive documentation is submitted and pre-approved by the DNREC-TMS that no portion of the tank system was in service after April 1, 2006.

#### SOIL SAMPLING FOR TANK REMOVALS

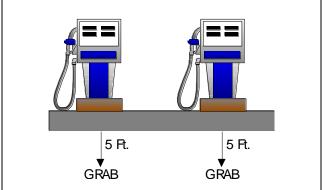
Any deviation from the following **must** be approved in advance by the DNREC-TMS:

#### Figure 1

#### **DISPENSERS**

All dispensers associated with the removed tank(s) must be sampled.

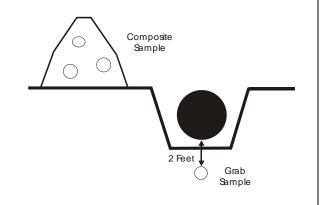
One grab sample taken 5' below each dispenser is required unless the dispenser is located in the tank field.



#### TANKS ABOVE THE WATER TABLE

Collect grab samples at a depth equal in elevation to two (2) feet below the bottom of the tank.

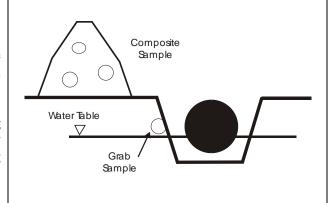
Composite soil samples must be collected by taking several discrete samples from the soil disturbed by excavation around each individual tank being removed and mixing them together.



#### TANKS BELOW THE WATER TABLE

Collect grab samples from the sidewall of the excavation immediately above the water table level in the pit.

Composite soil samples must be collected by taking several discrete samples from the soil disturbed by excavation around each individual tank being removed and mixing them together.



#### SOIL SAMPLING FOR TANK REMOVALS

Any deviation from the following **must** be approved in advance by the DNREC-TMS:

Figure 2

UST Capacity		
(gallons)	# of Samples per Tank	Illustration
0 – 1,100	1 grab & 1 composite/tank	
1,101 – 30,000	2 grabs & 1 composite/tank	
Multiple Tanks	Follow protocol for single tank based on capacity.  Include 1 composite per tank in the pit	Example: (3) 15,000 gallon USTs: