

TO: BPSS and Local Program Site Managers
Petroleum Cleanup Preapproval Program Contractors

THROUGH: Mike Ashley, Chief
Bureau of Petroleum Storage Systems

FROM: Thomas W. Conrardy, PE Administrator
Petroleum Cleanup Section Three
Bureau of Petroleum Storage Systems

DATE: May 11, 2000

SUBJECT: Procedures to Contact Site Owners of PLRIP and PCPP Sites

Effective immediately, site managers should send the attached form letter to owners of PLRIP and PCPP sites (and to the responsible party if a separate entity) at the conclusion of the site assessment if it is determined that active remediation will be necessary for the cleanup of the site. The letter informs the site owner of the status of funds expended on the site relative to the site's funding cap and also informs the site owner of the option to complete the cleanup with a No Further Action (NFA) with conditions as a means to lower the site's cleanup cost. It is the responsibility of the designated preapproval contractor to communicate with the site owner to inform of possible cleanup strategies and options and verify the site owner's cleanup intentions prior to submittal of a work order proposal to prepare a Remedial Action Plan (RAP). If the responsible party is not the current site owner, the responsible party will need to be involved in the discussion with the site owner. The work order proposal to prepare the RAP should include a separate paragraph verifying that the required discussion has taken place and that the site owner is aware of his/her potential financial obligation toward the cleanup, and summarizing the site owner's cleanup intentions. A work order for a RAP on a PCPP or PLRIP site will not be prepared unless the work order proposal includes the necessary discussion of this issue.

Consultants are encouraged to inform the site owner of various cleanup strategy options for their consideration regardless of whether they wish to consider NFA with conditions. The Department generally requires that the alternative with the lowest present worth cost be implemented if the Department is paying for the cost of the cleanup. However, if the funding cap will likely be exceeded such that the Department's contribution will be the same regardless of the alternative selected, the site owner may have other interests than present worth cost of remediation that may be considered. For example, a significant source removal followed by long term monitoring of natural attenuation may be more costly than a shorter cleanup with an installed remediation system; however, the site owner may want to consider this option to avoid having an operating system installed at the site and to allow his/her contribution to the cleanup (natural attenuation monitoring) to be defrayed over a longer period of time.

If you have any questions, please contact me at (850) 488-3935.

Attachment