



**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

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# Tanks Update / Issues

Laura Luther, Tanks RBCA Unit Chief

# Ask the Project Manager

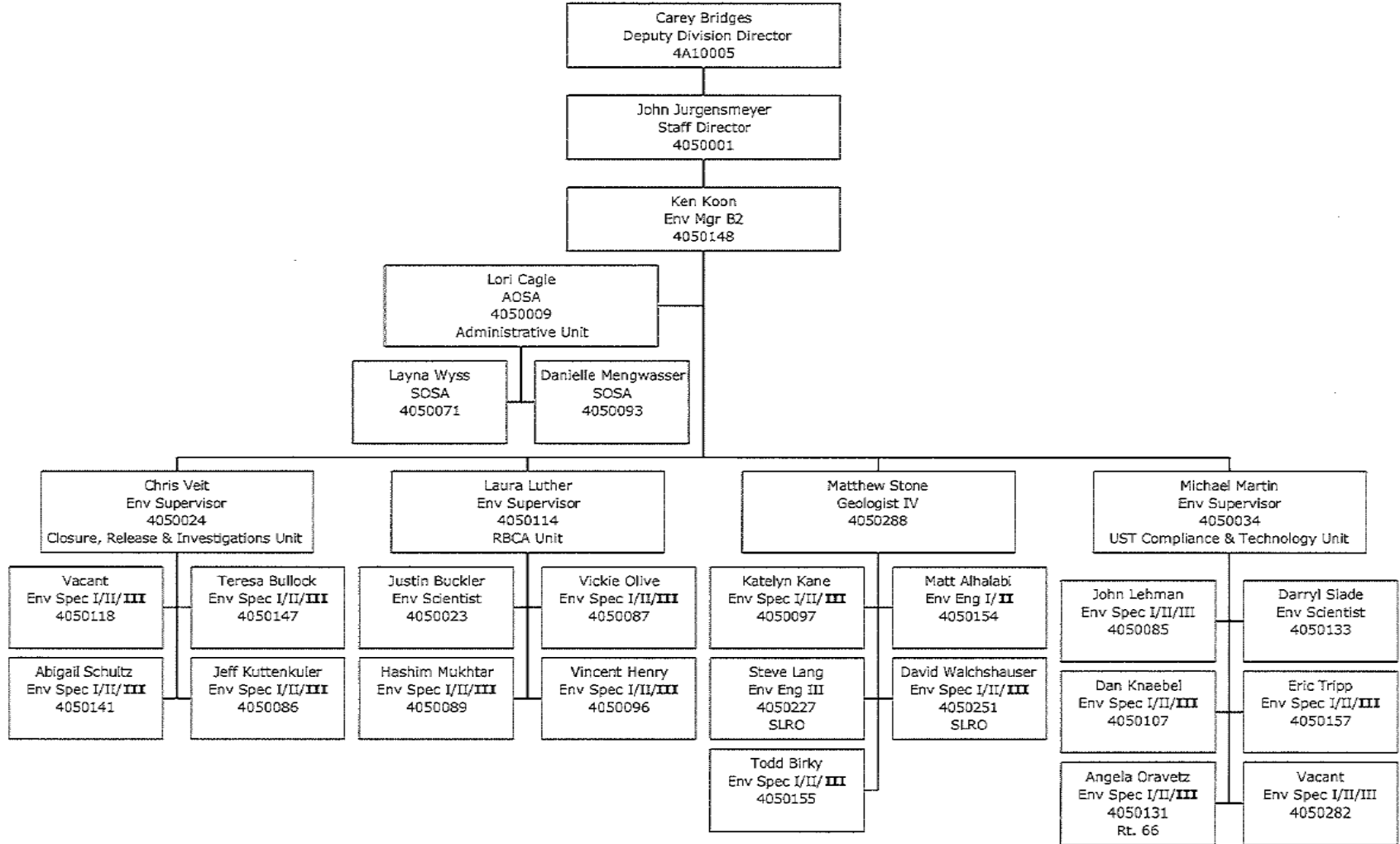
- Note Cards Available
- Box at Front of Meeting Room
- Answers: Tuesday at 1:30 Session
- Panel: Laura Luther, Matthew Stone, Chris Veit, Justin Buckler, Steve Lang, Darryl Slade, Brenna McDonald

# Changes at DNR

- Environmental Remediation Program
  - Tanks
  - Federal Facilities
  - Brownfields / Voluntary Cleanup Program
  - Superfund
- Tanks



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# Meetings and Conference Calls

- Agenda
- Attendance
- Attorneys
- Notes

# New Well Regulations

- MGS Session Monday at ~ 4:00 in Parasol I
- Implications in Tanks
  - Bedrock Wells
  - General Effect

# RSMo 640.648

- “Right to private water systems and ground source system retained, exceptions – right to rainwater protection systems retained.”
- Effective 8/28/2018

# Data Issues

- Use Closure Data in Risk Assessment
  - When release is found during closure
  - When closure occurs during release investigation
- Naphthalene and EDB Detection Limits
  - Must meet target levels for domestic use pathway if complete



# Data Issues Cont.

- When you have contamination above the DTLs then you must perform a risk assessment.

# Data Issues Cont.

- J-Flags or E-Flags
  - Estimated value outside the range of the instrument standards
  - Not defensible in court
  - Use Reporting Limit, Practical Quantitation Limit, etc.
  - MDLs not acceptable

# Data Issues Cont.

- What Samples to Use?
  - If it is appropriate for plume stability evaluation then it is appropriate for the representative concentration calculation and vice-versa

# Data Issues Cont.

- Polynuclear Aromatic Hydrocarbons (PAHs)
  - Soil
    - All Surficial Soil Samples which detect TPH-DRO or TPH-ORO
    - 25% or 2 (whichever is greater) of Sub-surface soil samples which detect TPH-DRO or TPH-ORO. Samples with highest amounts of TPH must be selected

# Data Issues Cont.

- Polynuclear Aromatic Hydrocarbons (PAHs)
  - Groundwater
    - 25% or 2 (whichever is greater) of groundwater samples which detect TPH-DRO or TPH-ORO. Samples with highest amounts of TPH must be selected
    - All groundwater samples that are used to evaluate the construction worker pathway which detect TPH-DRO or TPH-ORO

# Blanks

- Soil Samples – Section 5.8.5
  - Trip Blanks
- Groundwater Samples – Section 5.9.2
  - Field Blanks
  - Trip Blanks
- Soil Vapor Samples – Appendix C.5.6
  - At least one Field Duplicate
  - At least one Equipment Blank

# Domestic Use Evaluation

- Door-to-Door Surveys
  - Go Door-to-Door
  - Talking to city employees is not the same as talking to property owners

# Domestic Use Evaluations Cont.

- Springfield – Area 9 (Formerly Special Area C)
  - Citing Well Regulations Not Sufficient for Future Use Evaluations
  - Need Additional Discussion / Documentation to Support Evaluations





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# Thank You

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