



WORK PLAN

Task: Abandoned Tank Surveys

October 21, 2013

Scope of Work: Sullivan International Group, Inc. (Sullivan) has been tasked with assisting the U.S. Environmental Protection Agency (USEPA) Region 9 with its Abandoned Underground Storage Tank (UST) Initiative (Initiative), in partnership with the California State Water Resources Control Board (State Water Board). The Initiative is aimed at better defining the universe of non-compliant sites with abandoned USTs present statewide and addressing any identified risks such as leaking fuels to bring these sites into compliance. USTs are considered abandoned when regulated substances are no longer stored within those USTs and/or monitoring requirements of the Operating Permit and of Title 23, California Health and Safety Code 25298, are not being implemented, including maintenance of the UST system. USTs that are out of service (temporarily abandoned) for more than 12 months must be removed or permanently closed in place in accordance with Title 23 Rules.

Local agencies reported a total of 323 sites with abandoned USTs present or suspected to be present across the State of California. Out of these sites, there are 43 sites with product present in the USTs, 37 sites which have no product present, and 243 sites without any information regarding the presence or absence of product in the USTs at those sites. Sullivan will work with the State Water Board and local agencies to prioritize investigating and conducting Abandoned Tank Surveys on the sites with product known to be present or unknown status regarding presence or absence of product. Non-compliant sites will be further prioritized by those that have cooperative responsible parties (RPs) and which are readily accessible. The information gathered during prioritization activities will be used to obtain compliance at these sites.

In order to identify non-compliant sites where Abandoned Tank Surveys are needed, Sullivan will assist with issuing Notices of Non-compliance (NONCs) from the State Water Board to a list of 166 prioritized sites (18 sites with known product present and 148 with unknown product present). This list was created by removing the following sites from the original list of 323 abandoned UST sites:

- Sites with Leaking Underground Storage Tank (LUST) Cases in the State Water Board's GeoTracker database
- Sites in the City of Los Angeles for which Sullivan was unable to confirm the presence of USTs after conducting file reviews at City of Los Angeles Fire Department and online research
- Sites under jurisdiction of Los Angeles County Department of Public Works, as they will send out their own Notices of Violation

Before issuing NONCs, Sullivan will coordinate with the Unified Program Agencies (UPAs) to confirm current site status. For sites where the property owners come into compliance, the site



status will be updated in GeoTracker. Additional research will be conducted on sites that do not come into compliance.

In consultation with the State Water Board, Sullivan will identify up to 50 non-compliant sites for which Abandoned Tank Surveys will be conducted. The majority of surveys will be limited to include a UPA file review, online research, and site visit to conduct geophysical survey and tank gauging activities. The results will be written up in a simple format. For a small number of sites selected with input from city and county agencies, investigations will be performed in accordance with EPA's final regulations governing All Appropriate Inquiries (AAI) or ASTM E1527-05, which will serve as a guideline for producing more comprehensive surveys. Conducting an Abandoned Tank Survey for these sites will include the following components:

- Ordering reports from Environmental Data Resources (EDR) including the Chain of Title Report and a Premium Package, which includes a radius map report, city directory report, Sanborn maps, historical aerial photos, historical topographic maps, environmental lien search, property tax map report, and building permit report;
- Performing an online database search to obtain historical information about the site;
- Performing a historical file review;
- Obtaining site access for site inspection;
- Conducting a site visit, which will include:
 - Interviews with owners/operators
 - Visual inspection of site conditions
 - Visual inspection of adjoining properties
 - Conducting a geophysical survey
 - Gauging accessible USTs present onsite
 - Documenting site conditions, site characteristics, land use restrictions, institutional controls, or engineering controls

Staff Support: Two Sullivan staff members are dedicated part-time to activities under this initiative and are based in Los Angeles at the USEPA Region 9 Southern California Field Office. Additional staff support from Sullivan's San Francisco and San Diego offices will be utilized as well.

Deliverables for Staff Support in Los Angeles

Document Review Forms (File Reviews) and Electronic Files: For each online database researched or physical file reviewed at local regulatory agencies and relevant city departments, a form will be filled out indicating the date of each relevant document, the document type, and including notes summarizing components of the document relevant to the abandoned UST(s). Document Review Forms and electronic files will be uploaded to the individual site entries in GeoTracker.



Abandoned Tank Survey Reports: Written reports will be produced to summarize all of the information gathered from online databases, historical file reviews, site inspections, tank gauging, and geophysical surveys. Reports will be produced using ASTM E1527-05 as a guideline. Reports will be submitted electronically to the State Water Board, USEPA, and the U.S. Army Corps of Engineers (USACE), in addition to being uploaded to GeoTracker.

GeoTracker Updates: Sullivan will regularly update GeoTracker Site Status to reflect changes in site compliance. Status options include: (1) Unknown; (2) Out of Compliance – USTs with Product; (3) Out of Compliance – USTs without Product; (4) Out of Compliance – USTs with Unknown Product Status; (5) In Compliance – USTs in Service; (6) In Compliance – Temporary Closure; (7) In Compliance – USTs Closed in Place; (8) In Compliance – USTs Removed. Additional site information will be added in the Staff Notes section, such as information obtained from the local Certified Unified Program Agencies (CUPAs) through correspondence with the property owners/operators, and from site inspections.

Mid-Term Progress Report: A brief report on the progress of Abandoned UST Surveys and Compliance Status will be provided halfway through the period of performance for this task. The report will be composed mainly of an updated Master List – Inventory of Abandoned UST Sites in California spreadsheet. In addition to showing the compliance status of the 323 sites, information will be updated on the following: number of USTs present, UST capacity, UST composition, and the presence or absence of product. This report will be delivered electronically via email to the State Water Board, USEPA, and USACE.

Schedule: Sullivan will work on this task from October 2013 through November 2014. The deliverable schedule is provided in Table 1 below.

Travel: Travel will be required for site surveys in non-local areas and meetings in San Francisco with USEPA, U.S. Army Corps (USACE), the State Water Board, City representatives, and local regulators. There will also be local travel to visit CUPA offices, city and county building departments, local sites for site surveys, and other travel as required in order to support the project.



Table 1: Deliverables for the Abandoned Tank Surveys

Deliverable Name	Submission Date	Notes
General Deliverables		
Monthly Report	Monthly	This report summarizes the work completed by Sullivan staff on a monthly basis and is submitted to the USEPA.
Mid-Term Progress Report	April 30, 2014	This report provides a mid-term update on the compliance status of all Abandoned UST Sites in the Master List – Inventory of Abandoned UST Sites in California.
Final Report	November 30, 2014	This report provides an end-of-performance-period update on the compliance status of all Abandoned UST Sites in the Master List – Inventory of Abandoned UST Sites in California. It will also include lessons learned from the project.
Specific Deliverables		
Document Review Forms	As completed through November 30, 2014	Document Review Forms will be produced for prioritized Abandoned UST Sites and uploaded to GeoTracker along with relevant supporting documents.
Abandoned Tank Survey Reports (First 4 sites)	November 30, 2013	Each Abandoned Tank Survey report will provide information gathered during the first 4 site investigations and reports produced will use ASTM Standards as a guideline.
Abandoned Tank Survey Reports (Additional sites)	Ongoing through November 30, 2014	Additional Abandoned Tank Survey reports will be produced when additional site investigations are conducted.
GeoTracker Updates	Weekly or as needed through November 30, 2014	Updates will be made weekly or as needed on sites where compliance status has changed or new information has been obtained.

If there are additional requested deliverables, an addendum to this work plan will be created and submitted to USEPA and USACE.

Signature:

Date: 10/21/13

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