TELEPHONE CONVERSATION RECORD

DATE: May 2, 1989

PERSON CALLING: T. M. Chanda
Environmental Engineer

PHONE: 216-297-3221

PERSON CALLED: Mr. Kelly Gill, Mr. Tom Forbes, and Mr. Greg White
State Fire Marshal's Office
Bureau of Underground Storage Tank
Reynoldsburg, OH

PHONE: 614-752-8200

SUBJECT: Suction Line Rupture on Underground Storage Diesel Fuel Tank at Bldg. 1045

Kelly Gill Discussion 4/28/89

1. RVAAP has made contact with Bureau of Underground Storage Tank (BUSTR) to notify of subject leak. Spill is reported at approximately 5 gals. with no free product liquid accumulation or any significant soil contamination within the excavated area of the release. RVAAP had disconnected the suction line from the UST, removing the majority of the line and abandoning that portion extending into the foundation of the pump station. The contaminated soil was removed, sampled, and placed under protective cover pending analytical results for determining final disposition. Further sampling of soil was taken to confirm excavation of the contamination.

2. Gill sited EPA method 820 for Benzene, Toluene, and Xylene (BTX) and EPA method 7420 for total lead to be used upon the soil sample that was obtained following the excavation of contaminated soil layer. Both EPA methods are referenced in USEPA Methods Manual-SW846.

3. RVAAP will also be required to perform a core drilling process down to 20 ft. or first groundwater contact. The sample will be analyzed for Total Petroleum Hydrocarbons (TPH) using EPA Method 9071-SW846 soils extraction procedure followed by EPA Method 418.1 from USEPA publication 600/4-79-020. In the event groundwater is encountered prior to the 20 ft. termination point, only method 418.1 would apply since liquids would be the contaminated media rather than soil.

4. The results of this site investigation is to be presented by RVAAP, in formal report, to the State Fire Marshal's office within 20 days of the reported release. Realizing the laboratory turn around time sometimes exceeds 20 days, request can be made for a time extension of the formal submittal.

5. Gill will provide RVAAP with subject documentation to support the abovementioned directives.

Tom Forbes Discusion 5/2/89

1. Gill was originally contacted, but was unavailable at which this office was transferred to Gill's co-worker Tom Forbes.

2. Forbes was questioned to further clarify the drilling process for site investigation along with an administrative question regarding inventory record keeping upon regulated inactive tanks particularly those RVAAP tanks that were maintained in a stand-by status with a water and corrosion inhibitor mixture.

3. Forbes indicated that the drilling operation should be conducted with a split-spoon or shelby-tube type sampling device; either of which extracts a measured core sample. As the core samples are extracted from the bore hole field screening should be performed utilizing a Photoionization Device (PID). The PID performs an in-the-field analysis for benzene, a main constituent of distilled petroleum products. The PID analysis performs a course determination as to what depth the released product has penetrated as well as determining the uncontaminated zone. Core sampling should be performed in the same area of the release. On the subject of inventory recordkeeping frequency for inactive tanks, this office was turned over to a Mr. Greg White.

Greg White Discussion:
The following was conveyed to this office:

1. Any UST that is looked upon by the installation as inactive or laid-away status must undergo a regulatory process of temporary abandonment.

2. Temporary abandonment consists of complete product removal from tank and connecting lines; all product lines and appurtenances disconnected and capped; and final fill of the tank with inert material either pea gravel or sand. White recommended that inert material be pea gravel since it would be easier to remove by conventional means of vacuum and would not compact over time. Prior to implementing such action, a permit for temporary abandonment would have to be submitted to the State Fire Marshal's Office.

3. RVAAP's current status of inactive tanks being laid away with a mixture of water and corrosion inhibitor is unacceptable by State standards. The water itself may exist as a hazardous waste by reason of its lead content generated by the remnants of the petroleum product that remained during the time that the water and inhibitor were added to the tank; the lead being the constituent of the petroleum product. RVAAP should remedy this situation expeditiously. The water/inhibitor would have to be handled as a hazardous waste if analyses shows a concentration greater than 5 mg/L (ppm).

4. It was reminded that a permit application is required of RVAAP before commencement of any repair/replacement work. Permit issuance can be performed via a State certified Fire Safety Inspector or the State Fire

Marshal's office. Being a Federal Facility and an entity that does not formally adopt Ohio Fire Codes, RVAAP must deal directly with the State in permit matters.

5. Any permits that RVAAP may require pertinent to UST (e.g. temporary abandonment and/or repair/replacement) should contact Ms. Kate Graff of the Inspection Branch of the State Fire Marshal's office at phone 614-864-5510. There'll be a fee for each type permit filed with the State Fire Marshal's office.

T. M. Chanda

cc: RVAAP COR Office/Environmental
N. Wulff
H. Cooper
J. McGee/J. Mound
J. Watson
G. Wolfgang
R. Holford