

REGULATED STORAGE TANKS CORRECTIVE ACTION PROCESS INVESTIGATION OF SUSPECTED RELEASES

The Corrective Action Process (CAP) regulations (25 Pa. Code, §§ 245.301-245.314) establish suspected release investigation, release reporting, and corrective action requirements for owners and operators of regulated aboveground and underground storage tank systems and storage tank facilities, and other responsible parties. This fact sheet discusses the requirements for investigation and reporting of suspected releases found in § 245.304 of the CAP regulations.

What is required of owners or operators who suspect a release?

Owners or operators who, for any reason, suspect that a release may have occurred must initiate and complete an investigation within seven days to determine whether a release has occurred. Although the CAP regulations provide for seven days, the investigation should be completed as soon as possible to reduce potential cleanup costs and environmental damage in the event of an actual release.

Must owners or operators report suspected releases?

If the investigation confirms a release has occurred, the release must be reported to the appropriate Department of Environmental Protection (DEP) regional office in most cases. See DEP fact sheet *Regulated Storage Tanks Corrective Action Process Release Reporting* (Doc. # 2620-FS-DEP1838) for information on release reporting.

If the investigation confirms that a release has not occurred, the owner or operator must completely recover and remove any regulated substance. If removal of the regulated substance cannot be accomplished within 24 hours, the owner or operator must immediately notify the appropriate DEP regional office.

If the investigation cannot determine whether a release has occurred, the owner or operator must, within 15 days of the indication of the suspected release, notify the appropriate DEP regional office. This notification must be made using DEP form *Notification of Release – Notification of Contamination* (Doc. # 2620-FM-BECB0082).

What are some common reasons to suspect that a release may have occurred?

There are many signals that should cause an owner or operator to suspect a release and to undertake a confirmatory investigation. Those signals can come from storage tank system equipment, site records, the environment, or a combination of these. The following are some common signals:

- ***Warning signals from equipment or site records:***
 - Erratic behavior of dispensing equipment;
 - Inventory control records which indicate a product deficit or gain above the “leak check” quantity for the month. For additional information, see DEP fact sheet *How to Detect Tank Releases Using Inventory Control* (Doc. # 2630-FS-DEP1493);
 - A failed tightness test. For additional information, see DEP fact sheet *Tightness Test for Underground Piping Systems* (Doc. # 2630-FS-DEP2132);
 - A sudden or unexpected loss of product from a tank, or the unexplained presence of water in a tank;
 - Indications from other leak detection methods; or
 - The discovery of holes in a tank.
- ***Warning signals from the environment:***
 - The discovery or awareness of product or vapors in soils, basements, utility lines, sewer lines, surface water, water supply wells, or other locations where product or vapors are not usually present; or
 - The presence of product or vapors outside of the storage tank system components designed to routinely contain or convey product, at or near a storage tank facility.

Who should investigate a suspected release?

In some cases, the investigation of a suspected release will be a simple matter and can be easily accomplished by the owner or operator. In other cases, where the investigation involves tightness testing or sampling of soil or groundwater, the owner or operator may need the assistance of a certified installer or an environmental consultant to assist in the investigation.

What type of investigation is required?

To a large extent, the scope and nature of the investigation will depend on how the suspicion of the release was triggered.

For example, if the suspicion of the release was triggered by warning signals from equipment, such as a leak detection device, the first step in the investigation would be to verify that the leak detection device was working properly. If it was, then it would be reasonable to conclude that a release had occurred.

In some instances, inventory control records or a failed tightness test alone will be sufficient in the owner's or operator's view to confirm that a release has occurred and to initiate corrective action. In other cases, where the initial investigation proves inconclusive or the results are close to the detection limit of the leak detection method, the owner or operator may want to corroborate the results with more direct evidence. Visual inspections or analysis of soil and groundwater samples from borings or excavations prior to initiating corrective action are examples of direct evidence.

The CAP regulations list a number of procedures that may be used to confirm a release. One or a combination of procedures may be appropriate, depending upon the circumstances of the suspected release. These procedures are:

- Checking product dispensing or other similar equipment to determine the cause of the unusual operating conditions or erratic behavior;
- Checking the release detection monitoring devices to verify that they are working properly;
- Checking inventory records to detect discrepancies;
- Visually inspecting the storage tank system, if possible, and the immediate surrounding area. For example, this could include a check of the subsurface at any access points, such as piping valve covers, manways, spill containment areas, and beneath the dispenser pump;
- Testing the storage tank system for tightness; or
- Sampling and analysis of soil or groundwater at a location where contamination from a release would most likely be present.

Where can owners or operators get more information?

For more information, visit www.dep.pa.gov, search term: Storage Tank Cleanup or contact the local DEP regional office.

DEP Regional Offices

Northwest Region

230 Chestnut St.
Meadville, PA 16335-3481
Phone: 814-332-6945
(8:00 a.m. to 4:00 p.m., M-F)
800-373-3398 (after hours, weekends,
and holidays)

Counties: *Armstrong, Butler, Clarion,
Crawford, Elk, Erie, Forest, Indiana,
Jefferson, Lawrence, McKean, Mercer,
Venango, and Warren*

Southwest Region

400 Waterfront Drive
Pittsburgh, PA 15222-4745
Phone: 412-442-4000
(24-hour number including weekends
and holidays)

Counties: *Allegheny, Beaver, Cambria,
Fayette, Greene, Somerset,
Washington, and Westmoreland*

North-central Region

208 W. Third St., Suite 101
Williamsport, PA 17701-6448
Phone: 570-327-3636
(24-hour number including weekends
and holidays)

Counties: *Bradford, Cameron, Centre,
Clearfield, Clinton, Columbia, Lycoming,
Montour, Northumberland, Potter,
Snyder, Sullivan, Tioga, and Union*

South-central Region

909 Elmerton Ave.
Harrisburg, PA 17110-8200
Phone: 717-705-4705
(8:00 a.m. to 4:00 p.m., M-F)
800-541-2050 (24-hour number
including weekends and holidays)

Counties: *Adams, Bedford, Berks,
Blair, Cumberland, Dauphin, Franklin,
Fulton, Huntingdon, Juniata, Lancaster,
Lebanon, Mifflin, Perry, and York*

Northeast Region

2 Public Square
Wilkes-Barre, PA 18701-1915
Phone: 570-826-2511
(24-hour number including weekends
and holidays)

Counties: *Carbon, Lackawanna,
Lehigh, Luzerne, Monroe,
Northampton, Pike, Schuylkill,
Susquehanna, Wayne, and Wyoming*

Southeast Region

2 E. Main St.
Norristown, PA 19401-4915
Phone: 484-250-5900
(24-hour number including weekends
and holidays)

Counties: *Bucks, Chester, Delaware,
Montgomery, and Philadelphia*