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# Tank Closure Checklist

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Use this checklist to ensure that the information that is necessary for a complete Tank Closure Report is included in the report. Be aware that, as each site is different, the following may not address all issues at a particular site. The checklist includes most of the items that need to be addressed.

## Missouri Risk-Based Corrective Action Forms and Notifications

- Submittal of forms CN-1 and CN-2 30 days prior to Underground Storage Tank Closure.
- Provide notification to the department's Tanks Section three days prior to beginning closure activities. Phone (573) 751-6822.
- Call the spill hotline at (573) 634-2436 when contamination is confirmed (staining, odor, etc.)
- Forms CR-1, CR-2, and CR-3 as part of closure report. CR-1 contains signature of Underground Storage Tank owner/operator.
- Closure Report (submitted within 60 days of the completion of closure activities)

## Narrative

- Timeline of site activities.
- Cleanup target levels clearly stated.
- Reusable product recovered? Fate?
- Number of tanks removed and their observed condition.
- Number of tanks left in place.
- Planned future use of site.
- Are new tanks to be installed onsite?
- Amount of backfill and native soil removed and its fate.
- Concrete pad in pit? Its condition?
- Groundwater in pit? Removed? Recharge within 12 hours?
- Bedrock present?

## Site Maps

- Drawn to scale.
- Current on-site buildings.
- All adjacent property use.
- Location of tanks, excavation boundaries, product lines, dispenser islands.
- Depth of excavation.
- Underground utilities.
- Downgradient direction and degree of slope.
- North arrow.
- Locations of all obtained soil samples.

## Color Photos

- Pictures before excavation.
- Ends and sides of all tanks.
- Cleaned interior of tanks.
- Tank pit floor and sidewalls.
- Product line and dispenser trenches.
- Tank pad if present.
- Bedrock if exposed.
- Sealed Underground Storage Tanks/lines that are closed in place.
- Pictures after completion of closure.
- Description of photos.

## Laboratory Data

- Sample results from appropriately obtained samples (Section 4.4.2).
- Sample results for the appropriate Contaminants of Concern (COCs) (Table 5-1).
- If TPH-DRO or –ORO detected, 25 percent (or a minimum of two, whichever is greater) of samples with highest concentrations must be analyzed for PAHs. See the fact sheet *MO Risk-Based Corrective Action for Petroleum Storage Tank Sites - Sampling for Polynuclear Aromatic Hydrocarbons*, PUB2160 available from the department's Web site at [www.dnr.mo.gov/pubs/pub2160.pdf](http://www.dnr.mo.gov/pubs/pub2160.pdf).
- Sufficient sample results from all soil returned to the pit to establish that it was below clean up target levels for the site.
- Sufficient sample results for disposed soil.
- Background sample results for waste oil sites and pre-1980 gasoline tanks.
- Quality Assurance/Quality Control documentation.

- A complete chain of custody with all signatures, as well as the dates and times the samples were obtained and subsequently relinquished to the laboratory, and the temperature of the samples as they were received by the laboratory.
- Laboratory reporting limits must meet the Required Reporting Limits as outlined in Table 5-3 of the Missouri Risk-Based Corrective Action guidance document.

### **Tanks and Tank Cleaning**

- Photographic documentation and a signed statement by the party performing tank cleaning activities attesting to the proper cleaning of the tanks.
- A signed statement by the Underground Storage Tank owner or the owner/operator of the receiving facility attesting to the fate of the Underground Storage Tanks.
- Documentation on the fate of any usable product recovered from the Underground Storage Tanks.
- Proper characterization of the sludge/rinsate generated during tank cleaning activities as well as the appropriate manifest(s) signed by the generator, transporter, and receiving facility of the waste.

### **Soil and Water Disposal**

- Documentation of the proper disposal of contaminated soil (e.g. landfill disposal receipts, weight tickets).
- Documentation of the proper disposal of contaminated pit water, including:
  - Signed statement of permission from the Publicly Owned Treatment Works (POTW) prior to disposal
  - Documentation of wastewater characterization required by the POTW, and
  - Appropriate documentation that the wastewater was accepted by the POTW.

### **Other Possible Inclusions**

- If bedrock is encountered in the excavation, a geologic assessment performed by a registered geologist or a qualified professional engineer is necessary.
- If the soil type at the site is declared to be Soil Type 2 or 3, a Soil Type Determination must be made by a registered geologist or a qualified professional engineer (March 18, 2005 Guidelines).
- If the cleanup target levels are above the Default Target Levels, the domestic use of groundwater pathway must be evaluated in strict accordance with Section 6-3 and Figure 6-2.
- If the cleanup target levels are for non-residential use, documentation on the reasonably anticipated future use of the site must be submitted.

## **Closure Contact Information**

Closure Main Phone Line: (573) 751-6822

Brett Bottomley e-mail: Brett.Bottomley@dnr.mo.gov

Rick Brown e-mail: Richard.Brown@dnr.mo.gov

## **References and Forms**

Missouri Risk-Based Corrective Action Guidance Document

Missouri Risk-Based Corrective Action Closure Forms (CN- and CR-)

*MO Risk-Based Corrective Action for Petroleum Storage Tank Sites - Sampling for Polynuclear Aromatic Hydrocarbons*, Fact Sheet PUB2160 (PAH analysis)

Soil Type Determination Guidelines

The above may be found at [www.dnr.mo.gov/env/hwp/tanks/mrbca-pet/mrbca-pet-tanks.htm](http://www.dnr.mo.gov/env/hwp/tanks/mrbca-pet/mrbca-pet-tanks.htm)

## **For more information**

Missouri Department of Natural Resources

Hazardous Waste Program

Tanks Section

P.O. Box 176

Jefferson City, MO 65102-0176

1-800-361-4827 or (573) 751-6822

(573) 526-8922 fax

[www.dnr.mo.gov/env/hwp/tanks/tanks.htm](http://www.dnr.mo.gov/env/hwp/tanks/tanks.htm)

[www.dnr.mo.gov/env/hwp/index.html](http://www.dnr.mo.gov/env/hwp/index.html)