



Missouri Risk-Based Corrective Action for Petroleum Storage Tank Sites – Appropriate Documents to be Sealed by a Registered Geologist or Professional Engineer

Hazardous Waste Program fact sheet

10/2013

Division of Environmental Quality Director: Leanne Tippett Mosby

Each year, the Hazardous Waste Program’s Tanks Section receives thousands of documents pertaining to closure and remediation projects at underground and above ground storage tank sites. Some of the documents are reports or include data that, in accordance with the Geologist Registration Act at Sections 256.450 to 256.483 RSMo, needs to be signed and sealed by a Missouri Registered Geologist (RG) or Qualified Professional Engineer (PE).

This Fact Sheet includes a list of documents that environmental consultants and tank owners and operators routinely submit to the Tanks Section. Based on the experience of the Tanks Section with reviewing these documents, the following guidance has been developed to assist environmental consultants and tank owners and operators with identifying when a document must be signed and sealed by a RG or PE.

Please note that, as specified at Section 256.459 RSMo, the provisions of the Geologist Registration Act – including final determinations regarding what documents and data require the signature and seal of a RG – are administered by the Board of Geologist Registration. This guidance may not reflect the position of the board and should not be relied upon to ensure compliance with the Geologist Registration Act.

Type of Submittal	Is RG or PE Seal Required?
UST closure report	Only if report includes a tier I risk assessment evaluation or a bedrock assessment.
Suspected release report	No
Site check/system test report	No
Initial hazard abatement report	No
Free product recovery work plan	Usually not, unless plan includes a custom-engineered system.
Free product recovery report	No
Site characterization work plan	No
Certification and registration forms for borings or monitoring wells	No, but forms must be signed by a driller who holds a current, unrestricted monitoring well permit. A professional seal should accompany any boring log that is used for interpretation unless the RG personally (or someone under their supervision) created the logs or if the logs were stamped by another RG or PE.

Boring logs	No A professional seal should accompany any boring log used for interpretation unless the RG personally (or someone under their supervision) created the logs or if the logs were stamped by another RG or PE.
Site characterization report	Yes
Soil vapor monitoring work plan	No
Soil vapor monitoring report	Yes
Tier 1 risk assessment	Yes, including addenda, responses, etc., to the risk assessment that includes an evaluation of the data or assessment of risk.
Tier 2 risk assessment	Yes, including addenda, responses, etc., to the risk assessment that includes an evaluation of the data or assessment of risk.
Tier 3 risk assessment work plan	Yes, including addenda, responses, etc., to the risk assessment that includes an evaluation of the data or assessment of risk.
Tier 3 risk assessment	Yes, including addenda, responses, etc., to the risk assessment that includes an evaluation of the data or assessment of risk.
Corrective action plan	Yes
Corrective action report	Yes
Groundwater monitoring work plan	No
Groundwater monitoring report	Yes, if it includes evaluation of the data. If part of an approved quarterly plan, if data only, then seal is not required.
Plume stability analysis	Yes
Copy of restrictive covenant	No

- The department reserves the right to require a seal on any document that provides an evaluation of environmental data or a conclusion in regards to an assessment of risk, in accordance with the Registered Geologist Act.
- Disclosure required by Section 640.026, RSMo: Nothing in this document may be used to implement any enforcement action or levy any penalty unless promulgated by rule under chapter 536 or authorized by statute.

For More Information

Missouri Department of Natural Resources
Hazardous Waste Program
P.O. Box 176
Jefferson City, MO 65102-0176
800-361-4827 or 573-751-3553
www.dnr.mo.gov/env/hwp/index.html