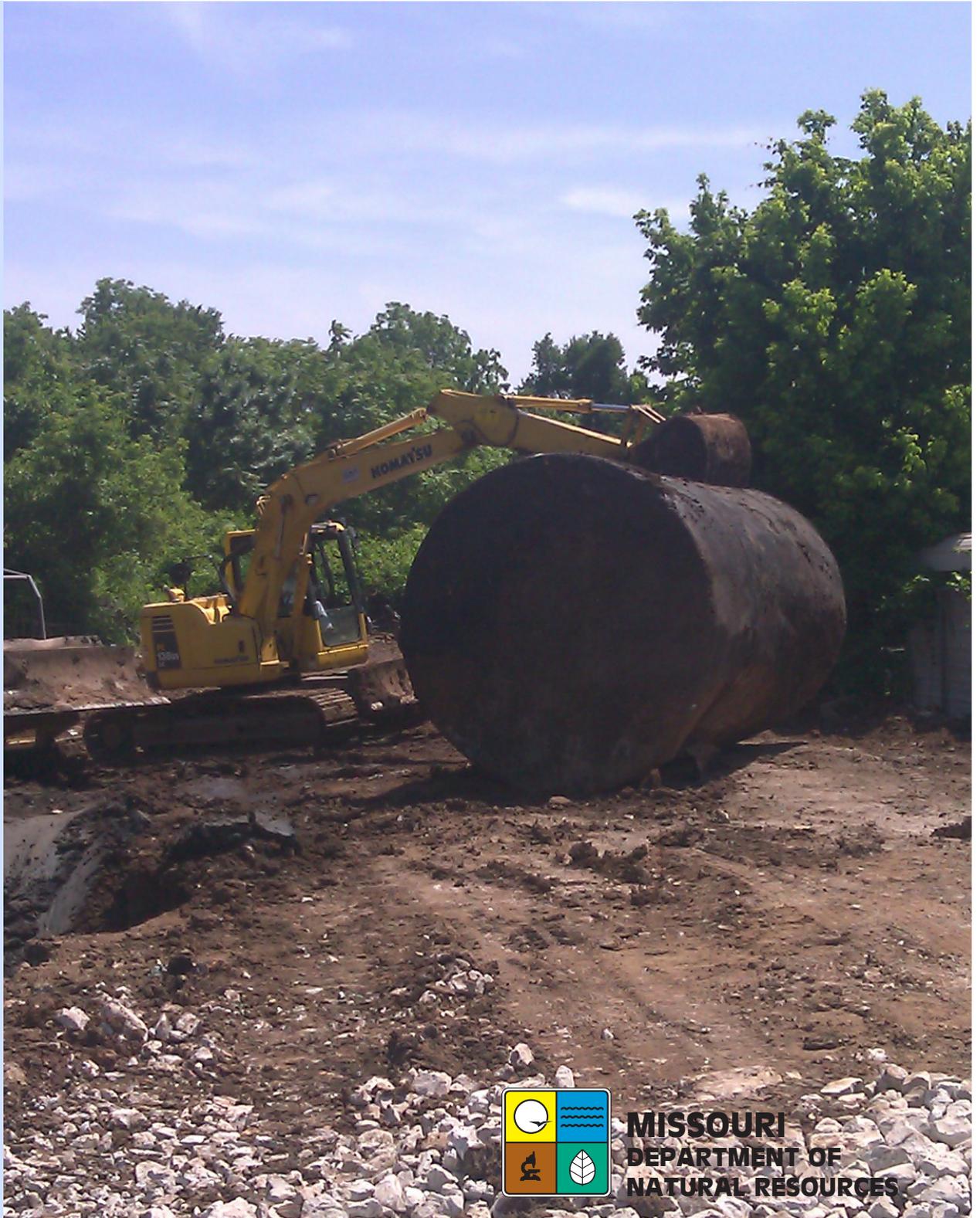


# Hazardous Waste Management Commission Report

January through March 2013

Quarterly Report



**MISSOURI**  
**DEPARTMENT OF**  
**NATURAL RESOURCES**

## **Hazardous Waste Management Commissioners**

Michael Foresman, Chair  
Andrew Bracker, Vice Chair  
James "Jamie" Frakes  
Elizabeth Aull  
Deron Sugg  
Charles "Eddie" Adams

**"The goal of the Hazardous Waste Program is to protect human health and the environment from threats posed by hazardous waste."**

### **For more information**

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Hazardous Waste Program**

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Past issues of the Hazardous Waste Management Commission Report are available online at [www.dnr.mo.gov/env/hwp/quarterlyreport.htm](http://www.dnr.mo.gov/env/hwp/quarterlyreport.htm).



**Missouri Department of Natural Resources  
Hazardous Waste Program**

## **Program Update Letter from the Director**

Through this Commission Quarterly Report, we strive to provide information regarding the work we do here in the Hazardous Waste Program. The information in this report provides members of the Hazardous Waste Management Commission with the current status of various sites and issues being managed by the program. We also look for ways to make this report more readily available to our stakeholders and interested members of the public.

In this edition, one of our featured articles is about HAZWOPER training. This training provides our staff with the basic knowledge they need to work safely around hazardous materials and environments. We have a lot of employees whose job duties may require them on occasion to work around hazardous materials, or to perform activities out in the field such as sampling or field work oversight. It is important they have the necessary training to perform these duties safely. The initial 40-hour HAZWOPER training, coupled with annual refreshers, is one of the key trainings employees receive to help keep safety on the forefront of their minds. The article in this report elaborates the importance of this training.

Also highlighted in this report are several remediation efforts recently completed by our Brownfield/Voluntary Cleanup Section, and an interesting article about the Kansas City Plant. This report also includes information about work being done by our tanks and our compliance and enforcement sections as well.

We hope you find this information useful and it gives you a better understanding of the diverse and complex work being performed in the Hazardous Waste Program.

Thank you,



David J. Lamb

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## Federal Facilities

### Kansas City Plant – A Federal Facilities Site on the Move

The Kansas City Plant has been located within the Bannister Federal Complex since 1949. Its owner, the U.S. Department of Energy, or DOE, is moving it to a new location at the National Security Campus eight miles south of its current site. Currently, the plant resides on a site dealing with several health-related concerns and environmental issues.

These issues are mostly due to chemical and facility emissions associated with the production of nuclear weapons parts and legacy contamination associated with the Department of Defense, or DOD, airplane production. Health and environmental issues are of concern to citizens who work and live around the site. To provide independent oversight of these issues, the Missouri Department of Natural Resources signed an *Agreement in Principle* with DOE. The department's Federal Facilities Section has been responsible for environmental oversight, monitoring and emergency response associated with this plant since Oct. 1, 1994.

The *Agreement in Principle* between DOE's National Nuclear Security Administration, or NNSA, and the department's Federal Facilities Section is unique for the Hazardous Waste Program because it is a non-regulatory agreement. The Federal Facilities Section acts as an independent agency with security clearance to provide environmental oversight, community relations assistance and emergency management planning for both the current site and the new National Security Campus. Security clearance allows the Federal Facilities Section to address all areas of the plant and provide the public with assurances security issues are not impacting health and environmental issues at either site.

The department is the appropriate agency to provide oversight because of the agency's on-going mission to protect public health and the environment. The department's oversight focuses on how facility operations and discharges impact people and the environment. The department reviews documents and on-site inspections then provides observations to DOE and the public on the facility's impact. Protection of and commitment to the citizens of this state, through responsible government, are an integral part of the department's mission.

A good example of this commitment is the work being done at the Kansas City Plant. Although sampling work remains a focus, the *Agreement in Principle* also provides staff with the opportunity to provide assistance about the current issue facing the plant. DOE is currently in the process of determining the future of the current Kansas City Plant.

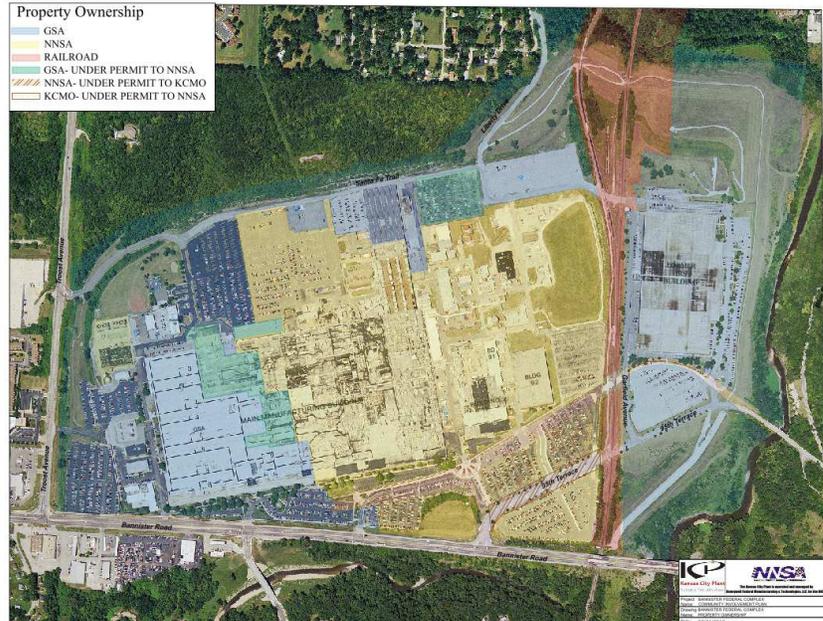
#### **Agreement in Principle**

Allows an independent agency with security clearance to:

- Monitor waste management activities.
- Review various facility documents relative to national issues, proposals and plans.
- Participate in emergency preparedness and response activities

### Site History

The old site for the Kansas City Plant is located 13 miles south of downtown Kansas City and sits on 136 acres. DOE shares the complex with the General Services Administration, which leases to other federal agencies. The Kansas City Plant is a government-owned, contractor-operated facility operated by Honeywell Federal Manufacturing & Technologies LLC, for the NNSA. The plant produces and procures non-nuclear parts for nuclear weapons, including electrical, electronic, electromechanical, mechanical, plastic and non-fissionable metal components.



May 2013 community involvement plan.

DOE operations began at the Kansas City Plant in 1949. Also, from 1942 to 1964, the DOD used a major portion of the plant as an airplane engine production facility. On-site releases of hazardous materials from both of these federal agency operations resulted in contaminated soil and groundwater. Releases from an underground tank farm, a trichloroethylene reclamation facility, a plating building and other industrial practices, resulted in contamination of large areas of soil and groundwater. The soil and resultant groundwater plumes contain solvents, polychlorinated biphenyls and petroleum products.

The DOE/NNSA is currently working on a multi-faceted program to transform the Kansas City Plant. The program, Kansas City Responsive Infrastructure Manufacturing and Sourcing, will include moving the plant to a new location. On Jan. 23, 2013 the Kansas City Plant officially began the move from the Banister Federal Complex to the National Security Campus. The new site is located at Highway 150 and Botts Road in Kansas City.

When working with the DOE/NNSA, there are three main areas that Federal Facilities Agreement in Principle staff participate in:

1. Emergency management planning.
2. Coordination and public awareness.
3. Environmental monitoring program.

## Emergency Management Planning

In 2012, department employees attended a Kansas City Plant emergency exercise related to the move to the Botts Road site. The exercise scenario was set within the context of a relocating Kansas City Plant and included elements of an actual event that occurred within the plant earlier in the year.

At the end of 2012, staff attended a tabletop emergency exercise about the move to the Botts Road site. The tabletop exercise was designed to assess the coordination among Honeywell Facilities Management and Technology, the contractors for the move to the new facility, the Kansas City Police Department, the Kansas City Fire Department and the hazardous waste response contractor that will be used for any off-site accidents. The scenario for this exercise involved an accident en route for a truck moving materials from the current plant to the new facility on Botts Road.

## Coordination and Public Awareness

In 2010, a Community Advisory Panel, or CAP, was established for the Bannister Federal Complex. Federal Facilities Agreement in Principle personnel were invited by CAP members to and attended CAP meetings.

In 2011, the federal and state stakeholders including the DOE/NNSA, General Services Administration, EPA and the department formed a group to create and provide input into a community involvement plan for the Bannister Federal Complex. The review process on the draft community involvement plan began in April 2012 and the final plan was approved by the department in spring 2013.

Agreement in Principle staff have also played a vital role in commenting about technical documents including a screening level risk assessment draft work plan, an application for the State Operating Permit for the National Pollution Discharge Elimination System for stormwater discharges at the Bannister Federal Complex and documents associated with the National Environmental Policy Act process.

## Environmental Monitoring Program

Agreement in Principle staff are active Stream Team participants and sample streams around the site of the current plant. They established and sampled two new stream team sampling sites on Indian Creek. Stream Team sampling is part of a national program for monitoring stream health.

## Objectives For The Rest Of The Year

Agreement in Principle staff expect to focus heavily on two issues at the complex. First, coordination and public awareness, due to the current media focus for the Bannister Federal Complex and the move to the new site on Botts Road. Second, coordination will continue among the department and the federal agencies involved in the site due to the work plans in development.



*Stream team members sampling water in Indian Creek, near the outfalls for the Bannister Federal Complex.*

### **Brownfields/Voluntary Cleanup Program Certificates of Completions**

Brownfields are real property, the expansion, redevelopment or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant or contaminant.

Through the voluntary cleanup program, private parties agree to clean up a contaminated site and are offered some protection from future state and federal enforcement action at the site in the form of a “no further action” letter or “certificate of completion” from the state.

The Brownfields/Voluntary Cleanup Program issued 13 certificates of completion for various sites from January through March 2013. This brings the total number of certificates of completions to 687.

#### **Antioch Center Mall - Kansas City**

The Antioch Center Mall site located at N.E. Vivion Rd. and N.E. Chouteau Trafficway in Kansas City has been developed since the 1960’s as a shopping mall and consists only of the mall building. Additional structures located on the property, including a Sears Auto Service Center and Goodyear Tire store were not included in this project and are not covered by this certificate of completion.

Phase I and II environmental site assessments identified asbestos-containing materials, or ACM, and lead-based paint, or LBP, inside the subject building, as well as a leaking hydraulic cylinder from an out-of-use elevator. These materials were removed from the building in accordance with an approved remedial action plan and approximately half of the subject building was subsequently demolished. The leaked hydraulic fluid was determined to be negligible. Some limited material was left in place and encapsulated within remaining portions of the structure.

The program approved an operations and maintenance plan detailing locations of the encapsulated material. This plan includes measures to prevent exposure from these materials and it is filed in the property’s chain of title. The department determined this site is safe for its intended use. The remaining portions of the subject building will undergo some renovation and continue to operate as retail businesses.

#### **Gate City Bank Building - Kansas City**

The Gate City Bank Building site is located at 1111 Grand Blvd. in Kansas City and is a 0.1 acre site. This building consists of seven stories and a basement with a total area of 42,000 square feet. The site was developed prior to 1896 and used for various retail and vendors shops. Gate City National Bank and various other retail shops and offices occupied this space from 1920 to 1970. Since the 1970’s, the building has been used for office space and nightclubs. A phase I environmental site assessment was conducted at the site. Recognized environmental conditions included nearby dry cleaners and gas stations. Asbestos-containing material and lead-based paint were also identified in the building.

A phase II environmental site assessment was conducted and no evidence of a release from nearby dry cleaners or gas stations was found. Some LBP was removed, some was left in place and encapsulated and all ACM was removed. An operations and maintenance plan for maintenance of remaining paint was written and filed in the chain of title for the property. All miscellaneous hazardous materials were removed and disposed. The department determined this site is safe for its intended use.

The Gate City Bank Building was redeveloped as the Ambassador Hotel-Kansas City, a boutique hotel.

### **Chillicothe Correctional Facility - Chillicothe**

The Chillicothe Correctional Facility site, located at 1500 Third Street in Chillicothe was developed between 1900 and 1930 and was formerly used as a correctional center for female inmates.

Site investigations revealed the presence of lead-based paint and asbestos-containing material within some of the 26 buildings remaining on the site. Clean-up activities included ACM abatement, LBP removal and hazardous materials removal. Abatement was performed using local, state and federal regulations. All ACM was properly removed, packaged, labeled and loaded for transport to an off-site facility for proper disposal. LBP was scraped, removed and properly disposed of as well. An inventory and profile was developed for all hazardous materials located throughout the facility, such as paint cans, degreaser, cleaning supplies, fluorescent lamps, ballasts, etc. Hazardous materials were collected and recycled when possible or taken to an approved off-site disposal facility. The department determined this site is safe for its intended use.

After cleanup, this property will be transferred to a developer and the campus will be converted into a mixture of residential, office and commercial space, including public athletic fields. The City of Chillicothe is in a period of economic expansion and is in need of more housing.

### **Hardy's Truck & Auto Parts - Springfield**

The Hardy's Truck & Auto Parts site is located at 3604 and 3616 W. Chestnut Expressway in Springfield. Historic uses of this property include an automotive machine shop, repair shop and parts sales. The business is inactive.

Site investigations indicated the presence of various petroleum and chemical products, sandblast sand from the former machine shop operations, in-ground oil-water separator and associated sump, tanks, piping and stained soil. A former water supply well was present inside the machine shop. Remedial actions included closing a former water supply well, since it was found to be inoperable. Sand-blast sand and near surface soil were excavated and disposed off-site at the City of Springfield Landfill. Liquid wastes and sludge were pumped from the oil/water separator and two associated tanks prior to excavation. The two metal tanks, after removal from the ground, were cut open, inspected and cleaned. The cleaned tanks were taken to a metal scrap yard and the piping was disposed at the City of Springfield Landfill. Groundwater samples were collected and indicated no impact above residential risk-based target levels. The department determined this site is safe for its intended use.

### **39th and Prospect Northwest Redevelopment Project - Kansas City**

The 39th and Prospect Northwest Redevelopment Project site consists of eight parcels located at 3838, 3840, 3846, 3850 Prospect, 3841, 3843 Wabash, 2500 and 2508 East 39th St. in Kansas City. This site is .841 acres and is part of a larger ALDI grocery store development. Past uses of these parcels include a gas station with auto repair shop at the 2500 East 39th St. parcel as well as several dry cleaners and a paint store on other parcels. Four underground storage tanks, or USTs, were pulled at the 2500 East 39th St. location in September 2009.

Site investigations indicated petroleum and lead present in the soil and groundwater on the property. A Missouri Risk-Based Corrective Action, or MRBCA, tier 1 risk assessment was performed to evaluate the risks to future occupants and receptors. The representative concentrations were below residential risk-based target levels. The concrete building slab and footings, product piping and hydraulic lift were removed from the former Andrew's Garage property. Soil sampling was conducted and soils impacted above residential standards were removed. A groundwater use assessment, in accordance with the

MRBCA guidance, was completed. This assessment determined the water bearing unit would not be considered an aquifer with respect to potential future use. The remediation was successful and no further action is necessary to meet unrestricted use of the site. The department determined this site is safe for its intended use.

### **The Former Edcor Safety - Kansas City**

The former Edcor Safety site is located at 1708 Campbell St. in Kansas City. This brick multi-level building occupies 44,913 square feet and was used for commercial, office and warehouse space. Constructed in stages from early 1900 to 1960, past uses of the property include a lumber company, roofing company, battery company, chemical companies and a safety equipment company. Two underground storage tanks were present on-site, with the facility ID ST0003163. These tanks were removed and a letter was sent in 1992 indicating no further action was necessary.

Site investigations revealed the presence of chlorinated solvents and associated degradation products in soil and groundwater. Concentrations above the default target limits, or DTLs, were found in the loading dock area on the southeast corner of the building in relation to a former underground storage tank area. Four quarters of well monitoring and a tier 1 risk assessment were conducted to find the risk posed by the chemicals of concern in soil and groundwater. Results indicate concentrations are below limits or the exposure pathway is incomplete. The site qualifies for unrestricted residential use. No site remediation will be required. The department determined this site is safe for its intended use.

### **The Former Ehlers Property - Springfield**

The former Ehlers Property site at 1420 W. College St. in Springfield is located near Jordan Creek, close to the intersection of College and Kansas Expressway. Previous uses of this site include; a bulk oil/filling station, from prior to 1933 to at least 1969; Smith Starter Service from 1983 to 2006; and Stone Effects - maker of cast concrete architectural products, from 2006 to 2011. The City of Springfield purchased the site in 2011.

An underground storage tank release was discovered in 2001 and closed out by the department in 2006. Contamination detected during investigation met standards acceptable for restricted, or non-residential, use.

Petroleum contamination was discovered in 2001 and investigated by the owner at that time under the oversight of the department's Tank Section. Site investigations found petroleum contamination at depths ranging from 8- to 12-feet below ground, which was apparently released from underground storage tanks and where it migrated along the top of bedrock toward Jordan Creek. The contamination was likely related to storage tanks for a bulk distribution and service station that occupied the site from the 1930s through the 1960s, prior to tank registration regulations. No tanks had ever been registered with the department and none were located during the investigation. Contamination detected during that investigation met standards acceptable for restricted, or non-residential, use with no remediation required. The site was issued a no further action letter by the Tank Section in 2006.



*Ehlers Property - before*

## Missouri Department of Natural Resources - Hazardous Waste Program

The city's planned future use of the site was green space. Fill was to be removed to re-contour the creek bank to create space for flood waters. The large-scale removal of soil and fill on the site would expose the zone of subsurface contaminated soil, so the city planned to remove it during the recontouring project. The cleanup goal was to reach levels suitable for unrestricted use, as well as protection of aquatic life in the creek from any newly exposed soil. Contaminants remaining at the site included benzene, naphthalene and gasoline range organics. Surface fill in a few areas of the site had elevated levels of lead typical of urban fill.



*Ehlers Property - after*

In 2012, following the approved remediation plan, remaining buildings were demolished, clean overburden was stockpiled and contaminated soil was removed from a large excavation through the center of the site extending to the top of bedrock. Three undocumented underground storage tanks, likely associated with the former service station, were discovered. The cleanup achieved target levels suitable for unrestricted use of the site.

The tanks were removed and scrapped and 2,497 cubic yards of soil were disposed at a sanitary landfill. The site was restored with a gentle slope to the creek which provides flood control for the area. The site was planted in native grasses, shrubs and trees. The department determined the site is safe for its intended use.

The site is part of a large scale effort by the City of Springfield, in cooperation with the U.S. Army Corps of Engineers, to reduce flooding at Jordan Creek by removing historic fill along the creek banks and restoring stormwater capacity. The site investigation was funded by EPA Brownfield Assessment grants, and the cleanup grant was obtained through the Environmental Improvement and Energy Resources Authority funded by EPA using American Recovery and Reinvestment Act funds.

### **Chanute Gustine - St. Louis**

The Chanute Gustine site located at 4444 Gustine Ave. in St. Louis is a 2 ½ acre site operated by a manufacturer of dry cleaning cartridges and canisters for water chillers. The property was developed in 1948 and past uses included manufacturing polystyrene car seats. The site is located down gradient of Koppers coal tar plant, which is undergoing Superfund response action.

Site characterization activities indicated trichloroethylene, or TCE, in soil and groundwater at levels exceeding the Missouri Risk Based Corrective Action default target levels with one soil sample also exceeding non-residential risk based target levels, or RBTLs. Chloroform was also detected in soils at levels exceeding DTLs. A risk assessment was conducted and determined no risk exists to residents, non-residents or construction workers from either the soil or groundwater contamination. Four quarters of groundwater monitoring showed the groundwater contaminants to be stable or decreasing. The department determined this site is safe for its intended use and it will continue to operate as a manufacturing facility.

### **Amber Lakes Lots 412, 420, 421 and 422 - Kansas City**

Amber Lakes 412, 420, 421 and 422 are four subdivision lots located between 10122 and 10126 N. Maywood Ave. in Kansas City. These lots comprise a portion of a site where a buried pipeline ruptured on March 11, 2008, releasing 7,100 gallons of gasoline. This site is part of a residential subdivision developed for new home construction. During the initial response action 3,200 tons of impacted soil was removed and 30,000 gallons of impacted groundwater was collected from two recovery trenches. An initial investigation showed some residual impact to soil and groundwater from the gasoline release.

After the initial emergency response, sampling was conducted to confirm all contaminants were removed. No contaminants were found above the default target levels the lowest risk-based target levels in the Missouri Risk-Based Corrective Action guidance. Following this, groundwater sampling was conducted, including installing a permanent groundwater monitoring well, and no contaminants were found. A groundwater collection trench, installed during the emergency response action, was removed. Following the trench removal, confirmation sampling was conducted. No contaminants above the DTLs were found. The department determined these four lots are safe for their intended use. Other lots at the Amber Lakes subdivision are still being investigated.

### **QuikTrip 202 - Independence**

The QuikTrip 202 site located at 16501 E. U.S. Hwy. 40 in Independence is the former Stephenson's Family Restaurant and Apple Market. Based on a review of historical resources, the subject site was owned by the Stephenson family since approximately 1920, and generally operated as a restaurant, orchard and market since that time. Historically orchards are known to be routinely treated with pesticides and other chemicals. The by-products of pesticides may include arsenic and lead.

Site investigations indicated surficial soil contained dieldrin, an organochlorine pesticide, above the Missouri Risk-Based Corrective Action Default Target Levels. Arsenic and lead were also detected in soils at the site but were within background concentrations for Jackson County. Remedial action included excavation and removal of dieldrin-impacted surficial soils in the area of the proposed retail store building. Asbestos containing material was also removed from the former Stephenson Restaurant prior to demolition. A cistern was abandoned and covered during one of the many additions to the restaurant. The abandoned cistern was uncovered by the construction contractor during the demolition of the restaurant and properly closed. The department determined this site is safe for its intended use. A new Quik Trip store will be located at the site.

# Missouri Department of Natural Resources - Hazardous Waste Program

## Sites in Brownfields/Voluntary Cleanup Program

	Active	Completed	Total
January	254	675	929
February	248	679	927
March	241	687	928

### New Sites Received

#### January

Carousel Building, Eldon  
 Preferred Family Healthcare, St. Louis  
 SRG Global - Farmington, Farmington  
 Market Street Office Building, St. Louis  
 McKnight Cleaners, Rock Hill

#### February

St. Louis FMGP #2, St. Louis

#### March

CMC Recycling, Joplin  
 Farfields, Sunset Hills

### Sites Closed

#### January

Antioch Center Mall, Kansas City  
 Gate City Bank Building, Kansas City

#### February

Chillicothe Correctional Facility, Chillicothe  
 39th and Prospect Northwest Redevelopment  
 Project, Kansas City  
 Edcor Safety (former), Kansas City  
 Hardy's Truck & Auto Parts, Springfield

#### March

Chanute Gustine, St. Louis  
 Ehlers Property (former), Springfield  
 QuikTrip 202, Independence  
 Amber Lakes Lot 420, Kansas City  
 Amber Lakes Lot 421, Kansas City  
 Amber Lakes Lot 422, Kansas City  
 Amber Lakes Lot 412, Kansas City

### Drycleaning Environmental Response Trust Fund

The department’s Drycleaning Environmental Response Trust, or DERT, Fund provides funding for the investigation, assessment and cleanup of releases of chlorinated solvents from dry cleaning facilities. The two main sources of revenue for the fund are the dry cleaning facility annual registration surcharge and the quarterly solvent surcharge.

#### Registrations

The registration surcharges are due by April 1 of each calendar year for solvent used during the previous calendar year. The solvent surcharges are due 30 days after each quarterly reporting period.

Calendar Year 2012	Active Dry Cleaning Facilities	Facilities Paid	Facilities in Compliance
Jan. - March 2013	189	71	37.57%

Calendar Year 2013	Active Solvent Suppliers	Facilities Paid	Suppliers in Compliance
Jan. - March 2013	11	8	72.73%

#### Cleanup Oversight

Calendar Year 2013	Active	Completed	Total
Jan. - March 2013	25	11	36

No New Sites Received or Closed

# Missouri Department of Natural Resources - Hazardous Waste Program

## Reimbursement Claims

The applicant may submit a reimbursement claim after all work approved in the work plan is complete and the fund project manager has reviewed and approved the final completion report for that work. The fund applicant is liable for the first \$25,000 of corrective action costs incurred.

	Received	Under Review	Paid/Processed
January	1	3	1
February	0	2	1
March	0	2	0

	Received	Under Review	Paid/Processed
January	\$3,160	\$49,930.36	\$10,314.29
February	\$0	\$29,112.40	\$7,860.36
March	\$0	\$144,245.53	\$0

## Reimbursement Claims Processed:

Site Name	Location	Paid
First Capitol Cleaners	St. Charles	\$10,314.29
Grandview Plaza	Grandview	\$7,860.36

**Total reimbursements as of March 31, 2013: \$2,133,530.96**

**DERT Fund Balance as of March 31, 2013: \$958,105.01**

### Inspections and Assistance

#### Regional Office Hazardous Waste Compliance Efforts

Conducted 109 hazardous waste generator compliance inspections:

- 11 at large quantity generators.
- 57 at small quantity generators.
- 30 at conditionally exempt small quantity generators.
- Nine at E-waste recycling facilities.
- One targeted re-inspection.
- One resource recovery inspection.

Conducted 14 compliance assistance visits at hazardous waste generators.

Issued 46 letters of warning and two notices of violation requiring actions to correct violations cited during the 109 inspections conducted.

Received and investigated a total of 52 citizen concerns.

#### Hazardous Waste Compliance and Enforcement Efforts

Conducted 11 inspections of commercial hazardous waste treatment, storage and disposal facilities, or TSDs. One that resulted in the issuance of a letter of warning and two that resulted in the issuance of notices of violation. One inspection was also conducted at a non-commercial TSD.

- Resolved and closed eight hazardous waste enforcement cases.
- Finalized six settlement agreements.
- Referred one facility to the Attorney General's Office.
- Received two new enforcement cases.
- Issued one letter of warning and one notice of violation.

#### Underground Storage Tank Compliance and Technology Unit

##### New Unit Name

The Tank Compliance and Enforcement Unit recently changed its name to the Underground Storage Tank Compliance and Technology Unit, or UST-CTU. We believe this new name closely reflects the level of staff's time and efforts in providing technical and regulatory information. They also are responsible for assisting tank owners and operators in the pursuit to remain compliant with laws, regulations and safety concerns. Enforcement measures are used by the unit when compliance is avoided or delayed without approval and when other efforts to prompt compliance are not successful. Enforcement remains an important component in this unit's work.

##### Heather Peters serves on the National Work Group on Leak Detection Evaluations

This group is comprised of 10 members who represent various states and one member from the U.S. Environmental Protection Agency, or EPA. Each member is a state or federal employee whose job is to regulate storage tanks for their agency's regulatory program.

The National Work Group on Leak Detection Evaluations, or NWGLDE's, mission is to:

- Review leak detection system evaluations to determine if each evaluation was performed in accordance within acceptable leak detection test method protocol.
- Ensure leak detection systems under review meet EPA and other regulatory performance standards, if applicable.

# Missouri Department of Natural Resources - Hazardous Waste Program

- Review only draft and final leak detection test method protocols submitted to the work group. This is to be accomplished by a peer review committee ensuring protocols meet equivalency standards stated in the EPA standard test procedures.
- Make results available to interested parties through NWGLDE's List of Leak Detection Evaluations for Storage Tank Systems. This list includes storage tank and associated piping leak detection equipment that has undergone third-party evaluations and found by the work group to meet evaluation requirements contained in accepted protocols.

There is a website version and a current edition version of the list. The website version of the list is updated continuously and has the most up-to-date information available but cannot be readily downloaded. The current edition version of the list is easily downloaded, but is only updated approximately once a year.

Those who wish to have their equipment included on NWGLDE's list may go to NWGLDE's website at <http://www.nwglde.org> for information about the necessary requirements and procedures to submit the proper documentation to the work group.

## **Tank Installation Inspection Efforts**

The CTU has long recognized the importance of assuring tanks and piping are installed correctly and safely to help assure long-term compliance and to avoid catastrophic and costly petroleum releases. The CTU has renewed its efforts with staff inspecting each new installation for which the department is notified. These inspectors verify that installations are done in accordance with manufacturer's requirements and with state and federal regulations.

They also provide technical assistance to owners and installers before, during and after installation. In addition, staff must:

- Review notifications for compliance and assure all information is included.
- Check to see if manufacturers and installers have the necessary financial responsibility in place.
- Check to see if installers are certified for the type of tank, piping and equipment being installed.
- Assess compatibility of equipment with product to be stored.
- Manage inspection scheduling.

Staff also coordinates with and informs partners such as the Petroleum Storage Tank Insurance Fund, the Missouri Department of Agriculture, local agencies and the department's regional offices, about the unit's activities in this regard.

January through March 2013, the CTU staff completed four settlement agreements for UST enforcement with financial responsibility, or FR, violations. UST owners/operators subject to FR requirements must have a financial mechanism in place to pay for cleaning up a site if a release occurs, to correct environmental damages and to compensate third parties for injury to their property and themselves. Releases can be costly and FR is an important component in protecting the health and property of tank owners, operators and neighbors. As a result of the dedicated efforts by the UST CTU staff, the number of facilities without a verified financial responsibility mechanism is now less than 30.

## **Polychlorinated Biphenyl Inspector**

The Polychlorinated Biphenyl Inspector conducted 20 compliance inspections at various types of facilities throughout the state. The inspector's reports are forwarded to the U.S. EPA Region 7, which has authority for taking any necessary enforcement action regarding PCBs according to the Toxic Substances Control Act.

### **Hazardous Waste Transporter Inspector**

The inspector conducted 18 commercial vehicle inspections. As part of the Commercial Vehicle Safety Association's protocol, the department sends the inspection reports to the Missouri State Highway Patrol. The transporter must certify to the Patrol the violations were corrected.

The inspector sent 19 letters to inactive, unregistered or conditionally exempt small quantity generators companies who shipped either small or large quantities of hazardous waste. These facilities are required to register as generators with the department. Two notices of violation were issued to unlicensed transporters.

As of March 31, 2013, there were 257 licensed hazardous waste transporters in state. The number of licensed hazardous waste transporters has slowly increased over the past two years.

### **Hazardous Waste Enforcement Unit**

#### **Midwest Container Reconditioning Settlement Agreement - Columbia**

Midwest Container Reconditioning is a large quantity generator with an operating facility in Fulton and a now closed facility in Columbia. The company cleans and reconditions drums. The facility failed to:

- Determine if waste was hazardous.
- To register as a hazardous waste generator with the department.
- Use a licensed hazardous waste transporter to transport more than 55 gallons of used oil at a time.
- Keep containers of used oil in good condition.
- Clearly label used oil containers with the words "Used Oil."
- Keep containers of used oil exposed to rainfall closed.
- Store hazardous waste in accordance with storage requirements.
- Use a manifest system.
- Provide all records relating to hazardous waste management.

As a result of the department's actions, the facility revised its operations to prevent unwanted wastes from accumulating and to allow for proper waste determinations. Also, the facility no longer self-transported used oil and now uses licensed hazardous waste transporters, resulting in consistent use of manifests. These actions resulted in protection of the environment and adjoining property and persons, and safer working conditions for facility employees.

The final penalty assessed is \$33,000, with an additional \$2,902.17 for cost recovery of department expenses. Of the \$33,000, \$11,000 is suspended contingent the facility not commit any repeat or class I violations for three years following the effective date of the settlement agreement. The remaining penalty of \$22,000 shall be paid in eight quarterly payments of \$2,750 each to the Boone and Callaway county school funds.

#### **Gregory Container Inc. Settlement Agreement - Kahoka**

Gregory Container Inc. is a large trash dumpster fabricator located in Kahoka. The facility failed to:

- Register as a hazardous waste generator.
- Determine if waste was hazardous.
- Use a permitted treatment, storage or disposal facility.
- Use containers in good condition to store hazardous waste.
- Keep containers closed while in storage.
- Package, mark and label waste per U.S. Department of Transportation requirements during the entire on-site storage period.
- Mark accumulation start date on containers of hazardous waste.

## Missouri Department of Natural Resources - Hazardous Waste Program

- Clearly mark containers "Hazardous Waste."
- Inspect weekly and maintain facility.
- Take precautions to prevent accidental ignition or reaction of ignitable waste.
- Conduct daily inspections of areas subject to spills.
- Operate and maintain the facility to minimize the possibility of an emergency.
- Train personnel to respond to emergencies.

Other violations included:

- Operating as an unpermitted treatment, storage or disposal facility.
- Storing hazardous waste in excess of the allowable 180 days.

As a result of the department's actions, the facility removed all hazardous waste from the facility, entered into a contract with a licensed waste hauler and instituted new procedures to ensure compliance with the regulations. These actions resulted in protection of people, the environment and adjoining property and safer working conditions for facility employees.

The final penalty assessed is \$24,000, of which \$10,000 is suspended contingent the facility not commit any repeat or class I violations for two years following the effective date of the settlement agreement. The remaining penalty of \$14,000 shall be paid in four quarterly payments of \$3,500 each to the Clark County school fund.

### **Aluminum and Brass Foundry Settlement Agreement - Independence**

Aluminum and Brass Foundry is located in Independence. The facility failed to:

- Submit an updated notification of regulated waste activity.
- Have placards available for transporters.
- Keep containers in satellite accumulation closed.
- Keep accumulated quantities under 55 gallons.
- Take full containers in the satellite accumulation area to the storage area within three days of filling.
- Mark containers with contents and start date of accumulation.

Store satellite containers at the point of generation and under the control of the operator of the process that generates the waste.

- Operate and maintain the facility to minimize the possibility of an emergency.
- Post locations of fire extinguishers and spill control equipment near the telephone.

As a result of the department's actions, the facility:

- Revised waste handling procedures to ensure no more releases to the environment would occur.
- Purchased proper labels for the transporter to use.
- Developed and implemented a new and much more extensive training program in hazardous waste management for employees.

The final penalty assessed is \$1,700 to be paid in quarterly payments of \$425 each to the Jackson County school fund.

### **Missouri Pesticide Collection Program Update**

Last summer, fall, and this spring, the department's Hazardous Waste Program and Environmental Services Program staff oversaw the Missouri Pesticide Collection Program. The Missouri Pesticide Collection Program is part of a supplemental environmental project funded by Walmart in settlement of a hazardous waste enforcement case and executed by The Environmental Company. The settlement agreement was signed in March 2012 and required \$1,050,000 be spent to provide an opportunity for farmers and households in Missouri to properly dispose of their waste pesticides and herbicides.

## Missouri Department of Natural Resources - Hazardous Waste Program

### ENFORCEMENT

The 2012 collection events were completed in October with more than 68,000 pounds of waste collected from nine different locations across Missouri. About half of the funds were expended. On Jan. 7, 2013 Walmart officially requested to extend the program through the year and two collection events have already been completed as of the end of this quarter. Currently staff of the Hazardous Waste Program and the Environmental Services Program is planning for the additional events including selecting the exact locations and additional advertising. A brief overview of the completed events, locations and dates for potential upcoming events are:

March 9, 2012 – West Plains collected 6,065 lbs.

March 23, 2012 – Mexico collected 11,915 lbs.

April 6, 2013 – Maryville

April 20, 2013 – Trenton

May 18, 2013 – Troy

June 1, 2013 – Lamar

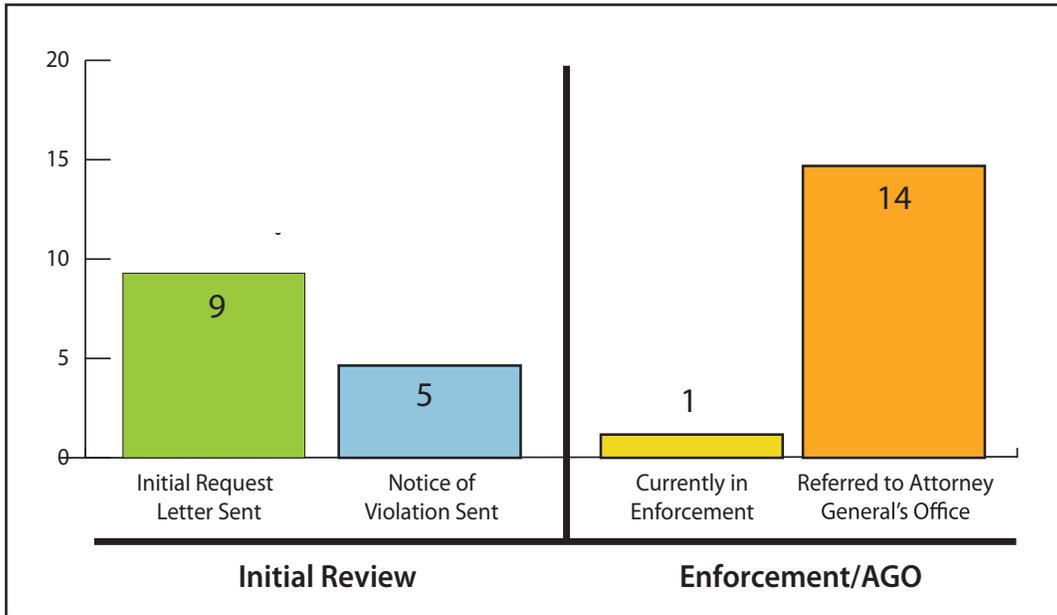
June 15, 2013 – Salem

June 29, 2013 – Clinton

At this time, the events in Troy and Lamar are scheduled to go forward, and funding should be available for the Salem event. A final decision regarding the Salem event will be determined after the Troy event, the local contacts for the Salem event were informed and a location was determined. As stated in previous updates, the events will only continue as long as funds remain, so all of these events may not be possible. However, the public will be informed as soon as possible of any plans or any cancellations. For more information or questions about the pesticide collection program, visit <http://www.dnr.mo.gov/env/hwp/pesticide/>, or contact Andrew Reed at 573-526-2736.

## Underground Storage Tank Facilities with Unknown Financial Responsibility Status Report

Financial Responsibility Status	Number of Facilities
Initial Request Letter Sent	9
Notice of Violation Sent	5
Currently in Enforcement	1
Referred to Attorney General's Office	14
<b>Total Number of Facilities with Unknown Financial Responsibility</b>	<b>29</b>



*\*This semi-monthly report is derived directly from a copy of the UST Database and provides a "snap-shot" of the status for each active underground storage tank facility not covered by a proper Financial Responsibility Mechanism.*

### Department Approves Missouri Hazardous Waste Management Facility Permit Class 3 Modification for Green America Recycling LLC

Green America Recycling LLC's Class 3 permit modification request was submitted to the department on Nov. 30, 2012. This was a revision of the original request dated April 30, 2012, asking to modify its existing Missouri Hazardous Waste Management Facility Part I Permit. The company requested the modifications be addressed before renewal of its hazardous waste permit.

The draft permit modification identifies the facility name as Green America Recycling LLC, or Green America; however, the permits are issued to and regulate activities performed by both Continental Cement Co. LLC and Green America Recycling LLC. Continental Cement Co. LLC operates the dry process cement kiln permitted to burn hazardous waste. Green America Recycling LLC operates the on-site hazardous waste fuel programs, which includes receiving, sampling, off-loading, storing and processing the liquid and solid hazardous wastes received at the permitted facility.

Green America Recycling LLC requested to modify the Part I Permit to build a Subpart X Miscellaneous Treatment Unit to convert processed solid waste-derived material into a synthetic gas that will be used as alternative fuel in the pre-calciner portion of the kiln system. The new unit would be housed in an extension to the existing feed barn building.

After a thorough technical review of the permit modification request, on March 19, 2013, the department issued Missouri Hazardous Waste Management Facility Part I Permit Modifications, effective immediately. The final permit modifications allow Green America Recycling LLC to build the Subpart X Miscellaneous Treatment Unit, allowing it to manage the processed solid waste-derived material in a more efficient manner. The modified Part I Permit will remain in effect until the permit renewal under review is finalized and a new Part I Permit is issued.

### Keeping Our Staff Safe - HAZWOPER Training

According to the Missouri Hazardous Waste Management Law, companies that want to actively treat, store (for more than 90 days) or dispose of hazardous waste in Missouri are required to get a hazardous waste permit. Some "inactive" hazardous waste treatment, storage or disposal facilities are also required to have a hazardous waste permit in order to investigate, monitor and clean up hazardous waste releases to the environment at their facility.

As mentioned in previous articles, the permits section issues these permits after extensive review of the companies permit application to make sure they follow state and federal laws and regulations and study of the design and operation plans of the facility for sound engineering practices.

After issuing the permit, the permits section continues to watch over the construction and operation of the facility until it eventually closes. These activities require our staff to visit the facility on several occasions to make sure the facility continues to follow state and federal laws and regulations and the permitted activities. In the case of cleanup, or corrective action activities, employees investigate possible releases and may take samples of contaminated media. Any time staff is at a site, they have the potential of being exposed to hazardous waste.



# Missouri Department of Natural Resources - Hazardous Waste Program

Because of its amount, concentration, physical, chemical or infectious characteristics, hazardous wastes may cause or significantly contribute to an increase in serious irreversible, or incapacitating reversible illness, or death; or may pose a threat to the health of humans or other living organisms. The department provides its employees with training programs to ensure staff are aware of the potential hazards they may encounter and have the necessary knowledge and skills to perform the required activities with minimal risk to their health or the environment

The Hazardous Waste Operations and Emergency Response, or HAZWOPER, section of the Occupational Safety and Health Act, outlined in the Code of Federal Regulations 29 CFR 1910.120, is the centerpiece of worker protection standards for handling hazardous materials. The original HAZWOPER standards were the U.S. Department of Defense's Hazardous Waste Operations regulations used to direct the clean-up of spills and toxic waste left at military bases after World War II.



Notification signs help alert workers of potential hazards.

Today's HAZWOPER regulations grew out of several hazardous waste incidents:

- The 1978 Love Canal incident involved a chemical company that buried toxic waste in a landfill in the northern section of Niagara Falls, New York, and then sold it for development. The site officially covered 36 square blocks.
- The Valley of the Drums incident drew national attention in 1979, as one of the country's worst abandoned hazardous waste sites. During a 10-year period, thousands of drums were discarded in pits and trenches over a 23-acre site in Bullitt County, Kentucky.

The first HAZWOPER guidelines were created in 1984, with input from the Occupational Safety and Health Administration, or OSHA, and EPA. The regulation known as the Hazardous Waste Operations and Emergency Response became final on March 6, 1989, and effective in March, 1990. The purpose of the standard is to ensure chemical hazards in the workplace are identified and evaluated and information concerning these hazards is communicated to employers and employees.

The HAZWOPER standards describe five operations that fall within the scope of the regulations.

1. Cleanup operations required by a governmental body, whether federal, state, local or other, involving hazardous substances conducted at uncontrolled hazardous waste sites. This includes, but is not limited to, EPA's National Priority Site List, state priority site lists, sites recommended for the NPL and initial investigations of identified sites where a possible release has occurred.
2. Cleanup operations at sites covered by the Resource Conservation and Recovery Act of 1976, or RCRA.
3. Voluntary cleanup operations at sites recognized by federal, state, local or other governmental bodies as uncontrolled hazardous waste sites.
4. Operations involving hazardous waste at treatment, storage and disposal facilities regulated by RCRA. The Missouri Hazardous Waste Management Law combines the RCRA requirements EPA authorized Missouri to implement with other requirements that Missouri has added.

5. Emergency response operations for releases of, or substantial threats of releases of, hazardous substances without regard to the location of the hazard.

One thing worth mentioning is these standards apply to all private sector and federal government employees. OSHA has no authority to enforce regulations protecting state and local government employees. The HAZWOPER requirements in 29 CFR 1910.120 do not apply to state and local governmental workers unless that state elects to develop and implement its own OSHA-approved Occupational Safety and Health Plan. Missouri does not have a delegated OSHA program, so Missouri is not required to comply with 29 CFR 1910.120. However, under the Superfund Amendments and Reauthorization Act, section 126(f), EPA was required to issue standards for hazardous waste operations and emergency response that are identical to OSHA's standards. These standards are located in 40 CFR 311 - Worker Protection. Although both OSHA and EPA's HAZWOPER standards contain identical provisions, EPA and OSHA address different audiences. EPA's authority extends to state and local government employees conducting hazardous waste operations and emergency response in states that do not have a delegated OSHA program in effect.

The major requirements of the HAZWOPER standards are training for personnel engaged in the handling or use of hazardous substances, a written site-specific health and safety plan, use of personnel protective equipment when needed and development of an emergency response plan. There are several levels of training based on the work the employee will be performing and the level of the hazard they will be facing.

The department ensures its employees receive a level of training consistent with their responsibilities and potential for exposure to hazardous materials. Permits Section staff who go to hazardous waste sites are required to take the 40-hour HAZWOPER training before visiting their first site. The 40-Hour HAZWOPER training course covers chemical and physical hazard recognition, hazard controls, selection of personal protective equipment, air monitoring, respiratory protection, site control, decontamination, site-specific operations (drum handling, trenching and excavation, etc.) and an introduction to emergency response. There is also hands-on training and exercises to provide an opportunity to become familiar with equipment and safe practices in a non-hazardous setting. The purpose of hands-on training, such as putting on and taking off protective equipment and using air monitoring equipment, is to ensure employees have an opportunity to learn by practical experience.

A yearly 8-hour HAZWOPER refresher training is also required to maintain the initial training certification. The 8-hour HAZWOPER training courses are updated annually to reflect any changes in regulations. The courses also cover a refresher in chemical and physical hazard recognition, hazard controls, selection of personal protective equipment, respiratory protection, site control, decontamination, and any new topics to ensure employees receive adequate training.

## Department Attends the Annual Petroleum and Convenience Store Association Exposition

Staff from the tanks section recently attended the Petroleum and Convenience Store Exposition of Mid-America, or PACE, held at the Kansas City Convention Center on March 1 and 2. PACE is the premier Midwest tradeshow with more than 4,000 attendees from Missouri, Kansas, Iowa and Nebraska. This regional tradeshow attracts many key industry leaders and features the latest in petroleum and convenience store products, tank system equipment, hardware, soft goods, technology, the hottest new trends and services.

Staff had a chance to meet and inform members of the industry in an informal setting. Materials displayed by department staff included *Missouri Resources* magazine, a variety of department fact sheets about underground storage tank management and other underground storage tank publications. Many questions were answered, policies discussed and even a few compliments were received.

Staffing the booth from the tanks closure unit was Chris Veit from the closure, release and investigations unit, along with Heather Peters from the compliance and enforcement section petroleum storage tank enforcement unit. The tanks section chief, several members of the tanks section and staff from compliance and enforcement section attended the exposition.

## New Staff in the Tanks Section

The Tanks Section welcomed some new staff members in the last six months. Justin Buckler joined the risk-based corrective action unit in November 2012. Justin is deep in the process of learning the tanks risk-based corrective action process for petroleum tanks. Justin is a project manager for approximately 100 release projects.

Theresa Bullock joined the closure, release and investigations unit in February and is working on reviewing abandoned sites and sites where there are no responses to requests for investigation. She is working to find potential responsible parties and moving non-compliant owners or operators through the process. Her efforts may result in several cases moving forward through the enforcement process. For the abandoned sites, she is organizing them for inclusion for further work, including writing risk assessments and moving these sites to closure.

Steven Lang, an Environmental Engineer, came from the Water Protection Program to the tanks section in March. The tanks section is seeing a significant increase in sites that require corrective action plans, or CAPs, which require engineered remediation systems to achieve "No Further Action" status. The tanks section had to use other Hazardous Waste Program sections for review of these documents, as the tanks section did not have a professional engineer able to sign and seal a comment letter regarding a CAP. The addition of Lang provides oversight of these engineered systems and many of the tanks section staff will benefit from the increased mentoring and training in hydrogeological principles, contaminant fate, transport and exposure and engineering principles."

### **Tanks Section Planning Workshop at the Missouri Waste Control Coalition Conference**

The Hazardous Waste Program's tanks section is participating on the Missouri Waste Control Coalition to plan the 2013 Missouri Waste Coalition Conference, or MWCC, at the Tan-Tar-A Resort at the Lake of the Ozarks from June 30 through July 2. This will be the sixth annual workshop in conjunction with the MWCC events. This conference is targeted toward environmental consultants who provide services to tank owners and operators.

The conference provides consultants with information and training regarding the Missouri Risk-Based Corrective Action for petroleum tanks, new monitoring well regulations, training about the Ricker Plume Stability method and other remediation topics.

The workshop includes department staff, along with private consultants, private laboratories and others. EPA may also participate in the conference as an exhibitor and in a supporting role.

**Petroleum Storage  
Tanks Regulation  
March 2013**

<b>Staff Productivity</b>	<b>Jul-12</b>	<b>Aug-12</b>	<b>Sep-12</b>	<b>Oct-12</b>	<b>Nov-12</b>	<b>Dec-12</b>	<b>Jan-13</b>	<b>Feb-13</b>	<b>Mar-13</b>	<b>Apr-13</b>	<b>May-13</b>	<b>Jun-13</b>	<b>TOTAL</b>
Documents received for review	158	184	160	206	163	131	163	162	166	0	0	0	1,493
Remediation documents processed	91	123	146	131	112	131	116	116	134	0	0	0	1,100
Closure reports processed	8	20	16	8	14	14	15	10	13	0	0	0	118
Closure notices approved	16	10	16	17	12	5	11	9	10	0	0	0	106
Tank installation notices received	7	12	2	5	2	6	8	3	12	0	0	0	57
New site registrations	2	7	9	5	3	2	7	1	3	0	0	0	39
<b>Facility Data</b>													
Total in use, out of use and closed USTs	40,425	40,441	40,478	40,501	40,511	40,522	40,542	40,541	40,536	0	0	0	
Total permanently closed USTs	31,072	31,095	31,146	31,173	31,185	31,221	31,249	31,271	31,317	0	0	0	
In use and out of use USTs	9,335	9,341	9,346	9,343	9,324	9,299	9,288	9,265	9,219	0	0	0	
Out of use USTs	836	843	850	837	832	840	848	847	837	0	0	0	
Total hazardous substance USTs	398	398	398	398	398	398	399	399	398	0	0	0	
Facilities with in use and out of use USTs	3,557	3,562	3,563	3,562	3,555	3,548	3,545	3,538	3,528	0	0	0	
Facilities with one or more tank in use	3,260	3,260	3,259	3,263	3,263	3,258	3,254	3,249	3,243	0	0	0	

**Closures**

<b>Underground Storage Tanks</b>	<b>Jul-12</b>	<b>Aug-12</b>	<b>Sep-12</b>	<b>Oct-12</b>	<b>Nov-12</b>	<b>Dec-12</b>	<b>Jan-13</b>	<b>Feb-13</b>	<b>Mar-13</b>	<b>Apr-13</b>	<b>May-13</b>	<b>Jun-13</b>	<b>TOTAL</b>	<b>All Yrs</b>
Closure Reports Reviewed	8	20	16	8	14	14	15	10	13	0	0	0	118	
Closure Notices Approved	16	10	16	17	12	5	11	9	10	0	0	0	106	
Number of Tanks Closed (Closure NFA)	30	23	59	27	13	31	38	30	58	0	0	0	309	

**Cleanup**

<b>Underground Storage Tanks</b>	<b>Jul-12</b>	<b>Aug-12</b>	<b>Sep-12</b>	<b>Oct-12</b>	<b>Nov-12</b>	<b>Dec-12</b>	<b>Jan-13</b>	<b>Feb-13</b>	<b>Mar-13</b>	<b>Apr-13</b>	<b>May-13</b>	<b>Jun-13</b>	<b>TOTAL</b>	<b>All Yrs</b>
UST release files opened this month	11	7	10	10	5	15	6	5	5	0	0	0	74	6,497
UST cleanups completed this month	4	12	23	11	6	6	9	5	17	0	0	0	93	5,610
Ongoing UST cleanups	907	905	894	892	892	901	899	899	887	0	0	0		
<b>Aboveground Storage Tanks</b>														
AST release files opened this month	3	1	1	0	3	0	2	1	0	0	0	0	11	456
AST cleanups completed this month	0	2	2	1	2	0	0	1	0	0	0	0	8	266
Ongoing AST cleanups	193	192	189	189	190	190	191	190	190	0	0	0		
<b>Both UST and AST</b>														
Total release files-both UST & AST	0	0	0	0	0	0	0	0	0	0	0	0	0	75
Cleanups completed-both UST & AST	1	0	1	0	0	0	0	0	0	0	0	0	2	46
Ongoing cleanups-both UST & AST	29	29	28	29	29	29	29	29	29	0	0	0		
<b>Unknown Source</b>														
Total release files-unknown source	0	0	0	0	0	0	0	1	1	0	0	0	2	213
Cleanups completed-unknown source	0	0	0	0	0	0	0	0	0	0	0	0	0	174
Ongoing cleanups-unknown source	18	16	15	14	13	12	11	12	13	0	0	0		
<b>Documents Processed</b>	91	123	146	131	112	131	116	116	134	0	0	0	1,100	
<b>*Reopened Remediation Cases</b>	1	1	0	0	0	0	0	0	0	0	0	0	2	76

\*Reopened Remediation Cases was added Nov. 18, 2009 - the cumulative total has been queried and a running total will be tracked/reported with the FY 2010 Tanks Section Monthly Reports.

Effective December 2008 tanks with unknown substance will be included in total figures. Some measures are re-calculated each month for all previous months to reflect items added or edited after the end of the previous reporting period.