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DEPARTMENT OF NATURAL RESOURCES

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MEMORANDUM

DATE: JUL 03 2013

TO: Ken Koon, Chief
Tanks Section
Hazardous Waste Program

FROM: Aaron Schmidt, Deputy Director
Division of Environmental Quality

SUBJECT: Exclusion of Exposure Pathways Relative to an Active Underground Storage Tank Pit

For the purposes of this memo, the term "tank pit" is defined as one or more currently operating underground storage tanks (USTs) and the granular fill material immediately surrounding the operating USTs.

When evaluating the indoor inhalation of vapors exposure pathways for soil and groundwater for a future residential or non-residential land use scenario, the tank pit needs not be included in the evaluation. All areas outside of the tank pit shall be included in the evaluation.

When evaluating the construction worker dermal contact with soil and groundwater exposure pathways, contamination within the tank pit, whether free product or dissolved phase contamination, need not be included in the evaluation. The evaluator shall assume that construction workers working in an active tank pit are knowledgeable of the possibility for petroleum contamination to be present and such exposures will be prevented via the use of personal protective equipment by the workers.

All other exposure pathways, receptors and exposure domains shall be evaluated.

AS: lls