

PVI Regulatory & Industry Updates



September 26, 2013

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BP

La Palma, CA



ITRC PVI Update



PVI Tech Reg - Draft is currently being converted to the web-based format

Next full team review to begin in mid-September

July – Sept. 10: conversion of draft Tech Reg to web-based format

Sept. 10 – Oct. 1: Internal team member review of web-based Tech Reg

Oct. 7-8: 5th PVI Team Meeting in Chapel Hill, NC

Oct. 31: All revisions to draft web-based draft due

Dec. 16 - Mar. 14: External review of web-based Tech Reg (e.g., review through ITRC state network, federal agencies, and other ITRC stakeholders)

Dec. – June, 2014: Internet-based Training development (IBT)

March 26-28, 2014: 6th PVI Team Meeting as part of the ITRC Spring Meeting (Garden Grove, CA)

Jun 4, 2014: Final PVI Tech Reg available



BP Divests Downstream Assets in S CA

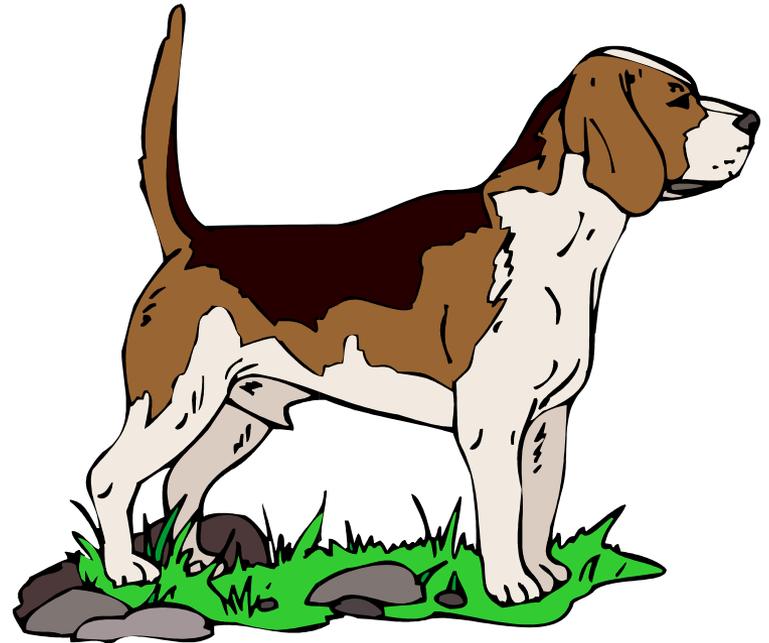


1. Carson refinery (266,000 bpd) and related marketing and logistics assets to [Tesoro](#) for \$2.5 billion in cash as of June 1, 2013
2. Approximately \$1.075 billion for assets and an estimated \$1.35 billion for inventory at market value and other working capital.
3. Includes approximately 200 retail sites in S CA
4. Includes environmental liability
5. Tesoro is now the second largest refiner in CA
6. ARCO retains 270 retail sites in N CA

Remaining BP sites in S CA



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- Multi-party Sites
- Chemical Sites
- Retail Sites with ongoing legal issues

Overview of EPA OUST PVI Guidance



Issued Draft Guidance Document: April 2013

Comments accepted up to: June 1, 2013

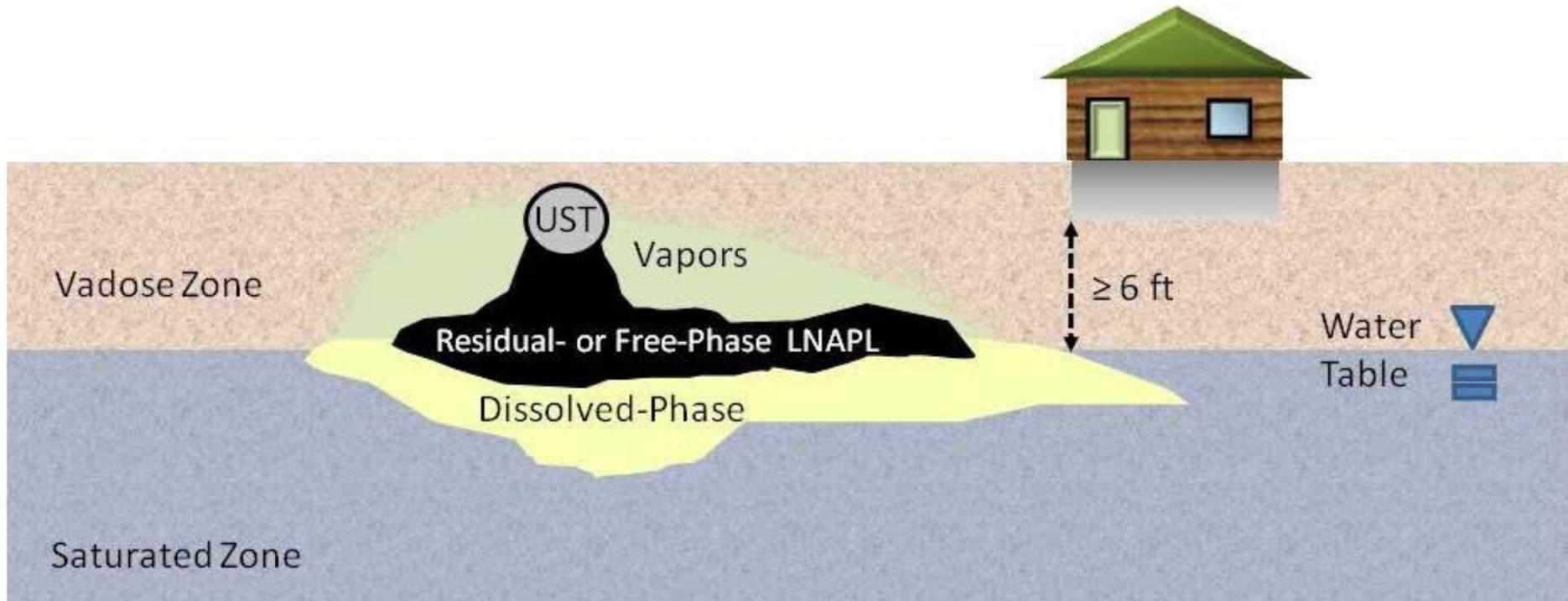
Draft Document: <http://www.epa.gov/oust/cat/pvi/petroleum-vapor-intrusion-review-draft-04092013.pdf>

Contains useable exclusion criteria

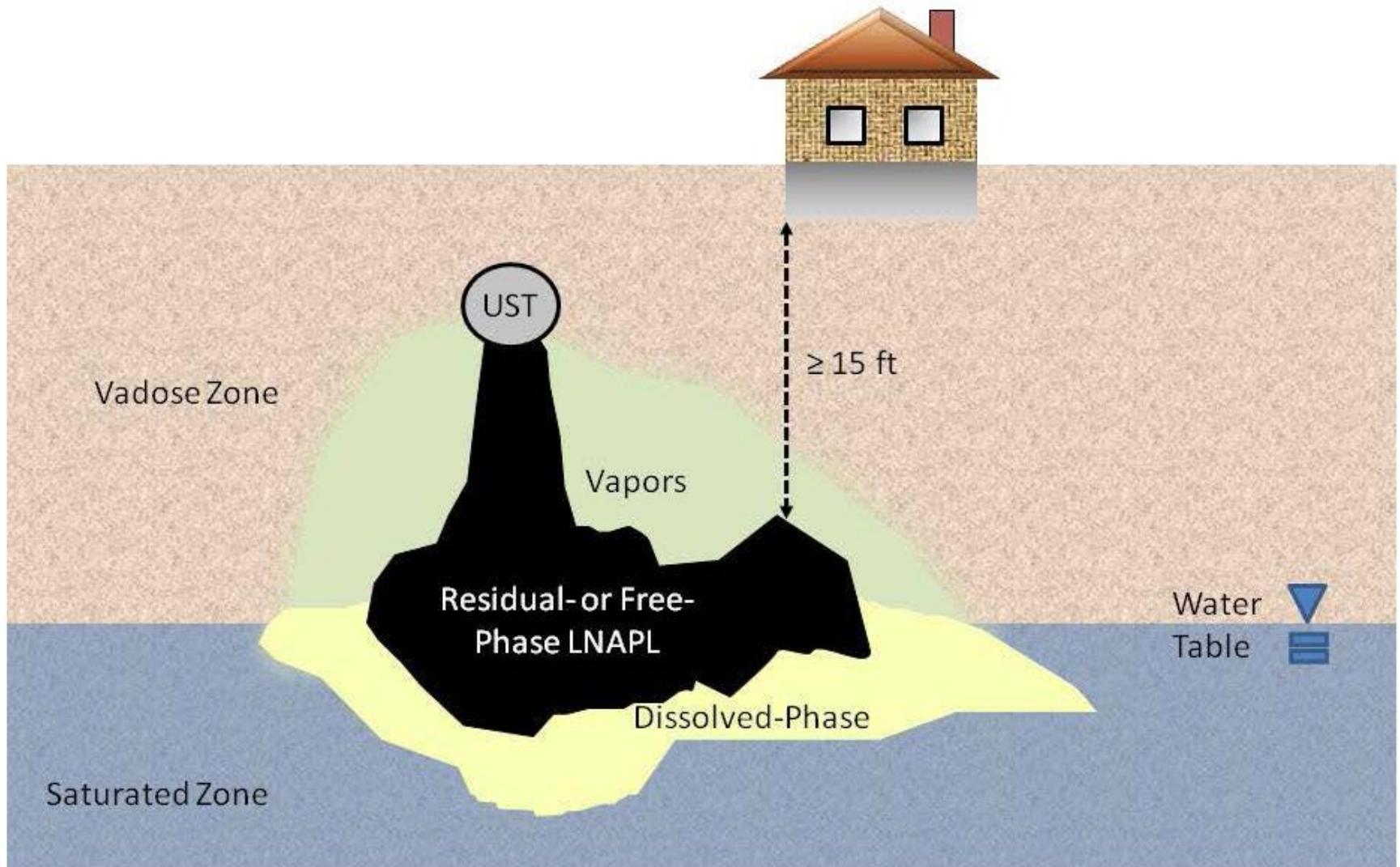
Should be used for all petroleum release sites

Based on extensive review of petroleum site data bases

Vertical Separation Distance: Dissolved



LNAPL Vertical Separation Distance



Lateral Separation for Exclusion



“lateral separation distance is on the same scale as the vertical separation distance “

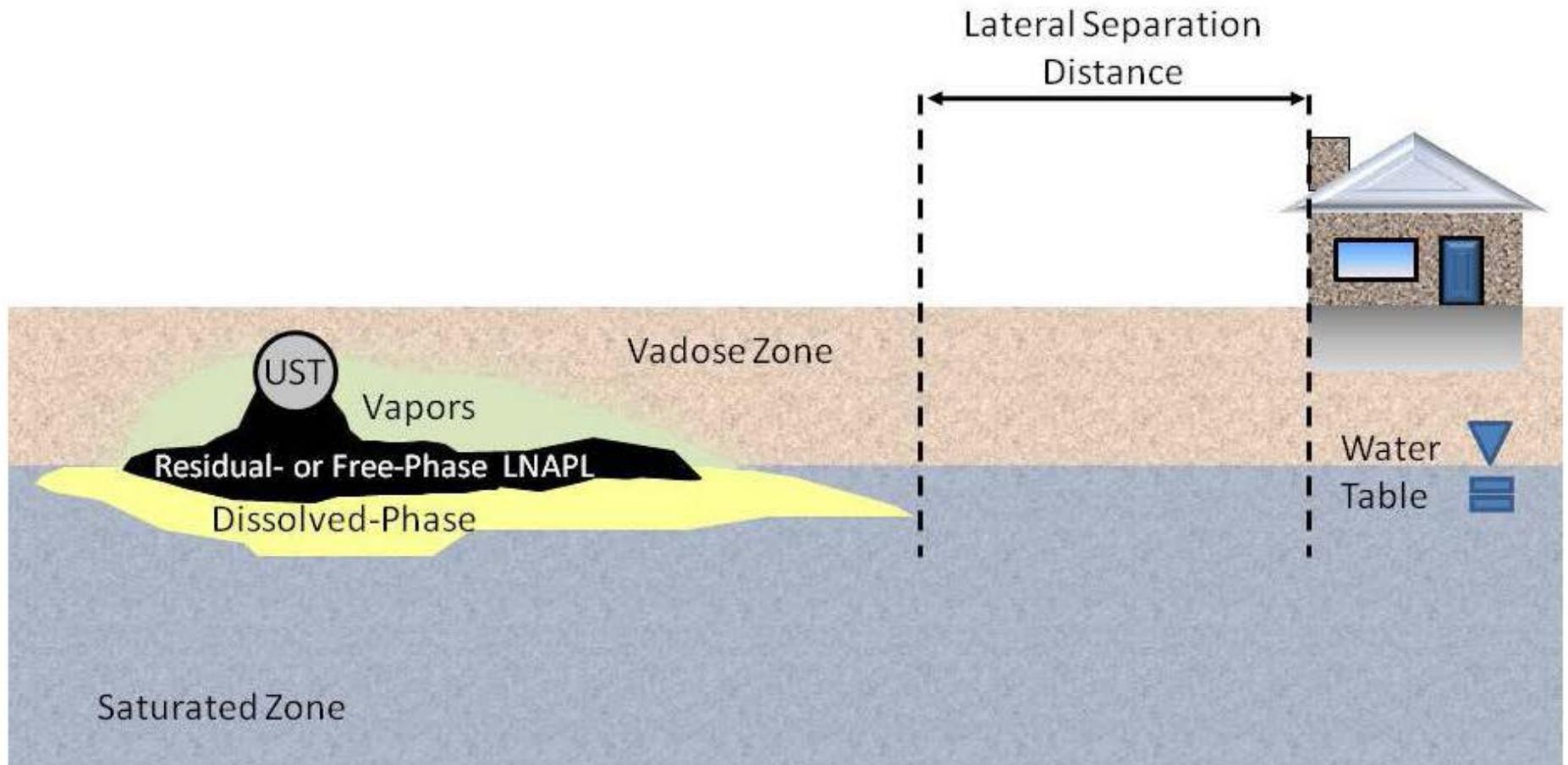




Table 3. Recommended Vertical Separation Distance Between Contamination And Building Foundation, Basement, Or Slab.

Media	Benzene	TPH	Vertical Separation Distance (feet)*
Soil (mg/kg)	≤10	≤250	6
	>10 (LNAPL)	>250 (LNAPL)	15**
Groundwater (ug/L)	≤ 5,000	≤30,000	6
	>5,000 (LNAPL)	>30,000 (LNAPL)	15**

API Comments to EPA (OUST & OSWER)



- The OSWER and OUST documents are not consistent for PVI
- Recommend that all PVI sites be referred to the OUST guide
- OUST needs to report on vertical separation distance findings from non-UST sites so that all petroleum sites can use the guidance
- OSWER guidance recommends excessive and multiple sampling including subslab and indoor; better alternatives are available for evaluating the PVI pathway
- Comment period ended June 1; no update on when revisions may be made



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Other Comments (OUST & OSWER).....



Taken at face value, the “guidance” provided in this document would make it virtually impossible to reach a no further action decision at any site with volatile contaminants present in the subsurface



The biggest problem is that all of the recommendations are wishy-washy and heavily caveated, making them useless. In my 18+ years working as an environmental consultant, I have never read a guidance document as poorly constructed as this one.

The biggest problem I see with this document is that if the site does not screen out from the criteria in Table 3, then the user is told repeatedly to collect soil gas or sub-slab soil gas data. But there are no guidelines/benchmarks given to interpret the soil gas data.

The oft-repeated recommendation to collect sub-slab soil gas samples is over-emphasized.

