



The Oklahoma Corporation Commission

Pollution Abatement Department, Oil and Gas Conservation Division, Guardian Guidance For the Assessment and Cleanup of Complex Crude Oil, Condensate, and Other Hydrocarbon Release Sites, Including Historically Impacted Sites

Effective October 1, 2002– Replaces April 1998 and revised 2000 Guidance



*"I am the Guardian... And I will stand guard here,
over our great state, over our majestic land, over our values."*

Senator Kelly Haney, sculptor of the **Guardian** statue that stands atop the new State Capital dome.

Oklahoma Centennial Commemorative Medallion
Design by Betty Price, Executive Director
Oklahoma Arts Council

**The Pollution Abatement Department, Oil and Gas Conservation Division,
Guardian Guidance For the Assessment and Cleanup of Complex Crude Oil,
Condensate, and Other Hydrocarbon Release Sites¹, Including
Historically Impacted Sites**

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The basic guidance is contained in the summary section, pages 3 and 4, and in Appendix I pages 17-21. The rest of the document provides more detailed information and advice.

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This document is intended as guidance only. It does not have the compliance requirements of a Commission rule. See OAC 165:10-7, 1 through 31, for the Division's Pollution Abatement rules.

¹ See Appendix V for tips on adapting this for spills from product and processed hydrocarbon pipelines and tank farms.

PURPOSE AND SUMMARY TABLE

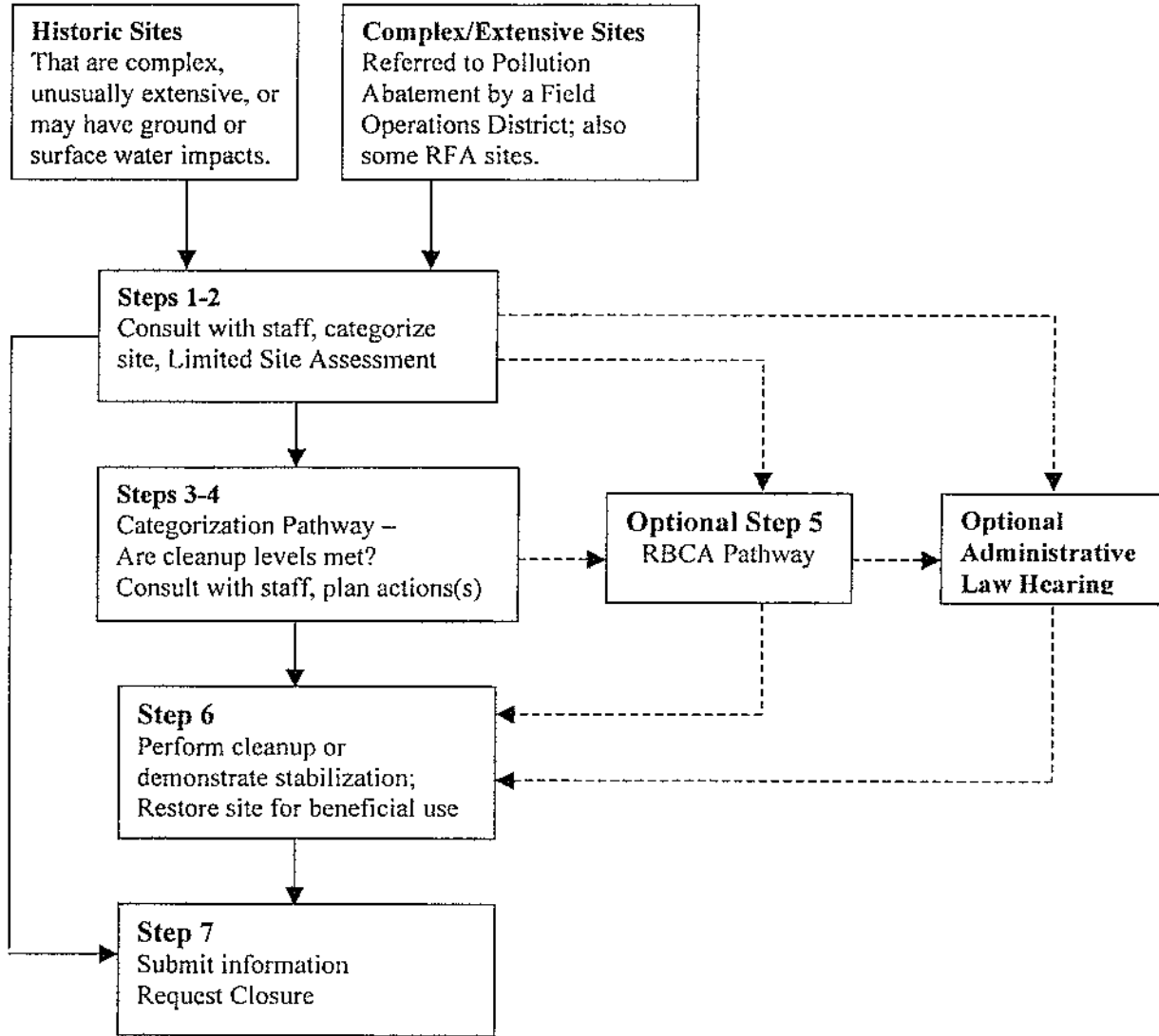
The large majority of oil and gas field related spills in Oklahoma are reported to and cleaned up in consultation with a Field Inspector in one of the Commission's Oil and Gas Conservation Division's (O&G) Field Operations Department District Offices. Appendix II details how to obtain spill reporting requirements and other District information. However, complex and/or unusually extensive² (see footnote) spills and historic pollution cases at oil and gas sites, pipelines, and tank farms in Oklahoma, especially those involving impacts to ground water or surface water, are managed in consultation with the O&G Division's Pollution Abatement (PA) Department. The step-by-step process an operator follows to assess, clean up if necessary, and close these sites is summarized below in Steps 1-7, and is explained in more detail in subsequent pages.

SUMMARY TABLE OF STEPS, AND ACTIONS TO BE TAKEN BY OPERATOR

Step	Descriptive Title	Actions (May choose to follow RBCA or Admin. Law Hearing pathway from Step 1 onward)
1	Consult with Poll. Abatement Dept.; categorize site.	Categorize site, discuss future actions. Choose pathway -Category (\Rightarrow Steps 1-4, 6); RBCA (\Rightarrow Step 5); or Administrative Law Hearing.
2	Limited Site Assessment	Collect soil/water/other site data (page 6); \Rightarrow Step 3.
3	Are category cleanup levels met?	If yes, confirm with PA, then \Rightarrow Step 6B (beneficial use restoration), and then request Closure Step 7. If no, \Rightarrow Step 4 or Step 5.
4	Consult with PA Dept. staff Plan to perform a cleanup and/or show stabilization or use RBCA.	Discuss with PA; choose what actions are to be done. \Rightarrow Step 6 A and B, or \Rightarrow RBCA path Step 5, or \Rightarrow Hearing.
5	Optional RBCA (risk based corrective action)	Prepare conceptual site model (see page 12). Consider: <ul style="list-style-type: none"> • Chemicals of concern, especially benzene and TPH; • Possible pathways/transport mechanisms to receptors; • Site beneficial use(s), state standards; and then • Develop RBSLs or SSTLs for site cleanup criteria. • If criteria met, \Rightarrow Closure Step 7. If not, \Rightarrow Step 6.
6	A. Perform cleanup or provide stabilization data. B. Restore site beneficial use(s) (example: site revegetation)	<ul style="list-style-type: none"> • A. Remove/remediate soil/water to meet Category or RBCA cleanup levels, <u>or</u> Demonstrate stabilization; • B. Restore site beneficial use(s). • If done, Operator requests Closure Step 7. • If cannot do this, consider \Rightarrow Hearing.
7	Operator submits data to PA and Requests case closure.	Submit final report (see Submittal Checklist, App. I). Request Closure .

2 Complex and/or unusually extensive - Spills at most sites involve limited petroleum hydrocarbon or brine impacts to soil near the wellhead, flowlines, or tanks. Complex and/or unusually extensive sites are those that a) involve several different substances; and/or b) involve impacts to surface water or ground water or bedrock, not just soil; and/or c) affect a relatively large area (e.g. from a large volume tank or pipeline break, or the fluid flowed a long way downhill).

SIMPLIFIED FLOW CHART
 (for complete detailed Decision Tree flow chart, go to Appendix I)



STANDARD CATEGORIZATION AND CLEANUP PATHWAY

This guidance is intended to cover sites that are overseen by the Oklahoma Corporation Commission Oil and Gas Conservation Division's Pollution Abatement (PA) Department. The two main types of sites/cases overseen by PA include:

Complex And/Or Unusually Extensive Sites

Recent spill sites where the assessment and/or remediation are likely to be complex and/or unusually extensive, and sites that have known or likely impacts to ground water or surface water, are often assigned (referred) by a Field Operations District Office to the (PA) Department. In addition, some complex request-for-assistance (RFA) sites (which are those sites that are handled by a Field Inspector with the requested assistance of a PA Hydrologist) may also be subject to all or part of this guidance as appropriate.

Historically Impacted Sites

A historically impacted site is not the result of a recent spill. It can be 1) an old spill site that was not adequately cleaned up, or 2) one that has site impacts resulting from practices that once were legal but which have resulted in a pollution problem(s), or 3) one that has pollution from an unknown source. Although not subject to the 24-hour spill/release reporting rule, these sites still should be reported when found, and must be cleaned up and/or restored to beneficial use. Sites that have only soil impacts are reported to the District Office, which will assign an incident number. Complex and/or unusually extensive sites/cases, and those likely to have impacts to ground water or surface water, may be reported directly to the PA Department (see Appendix II), which will assign the incident number.

PA staff prefers a voluntary, consultative process to formal hearings, and will provide guidance. There may be regulatory or other requirements to be met before a site/case is finished (see closure, in glossary). However, if there is disagreement over what should be done at a site, an Administrative Law Hearing may be requested by Pollution Abatement or an operator or a complainant (OAC 165:10-7-4(c)). In addition, the RBCA pathway may be chosen anytime from Step 1 onward.

STEP 1 – Consult with PA Staff about the Site, and

Complete the Initial Site Categorization using the Petroleum Risk Factor Index Table in Appendix I:

Complete, sign, and submit the Index Table in Appendix I to PA with a brief explanation of how the risk factors (e.g. volume lost, distance to water well, etc.) were determined. Operators may wish to consult with PA staff prior to completing the table(s), especially if there is more than one (different type of) impacted area at a site necessitating the submission of more than one Table. The table(s) should be reviewed and, if necessary, revised and resubmitted whenever new site information is obtained. Basic site and release/impacted area information may also be requested in this step by PA staff for sites lacking full documentation by the Field Inspector (Form 1085, usually). See the optional *Initial Site Evaluation Report*, Appendix VII, for the types of information that may be requested.

Choose either the PA category cleanup/stabilization or the RBCA pathway (see flow chart).
STEP 2 – Limited Site Assessment to Collect Needed Site Data:

The purpose of a limited site assessment is to document whether or not there is impact at/from the site that could cause a significant risk to human health or the environment, and thus need a cleanup. For guidance on what information (maps, reports, sampling data, etc) needs to be submitted, refer to the submittal checklist for Step 7 in Appendix I. The optional forms in Appendix VII may be used instead of the submittal checklist.

A list of environmental consultants and laboratories is provided in the Environmental Directory at <http://204.87.70.98/occfiles/responseteam/prthome.html>; see resources listed in Appendix II. If there could be additional site impacts in the release area from other sources (e.g. heavy metals from tank bottoms and sludges, old refining activities, former gas plants, mud pits; excess soil or water salinity from brine spills or old brine pits; glycol from a natural gas dehydrator), operators can consult with PA staff, request one of the Commission's other guidance documents, and/or look up one of the many guidance documents available from the American Petroleum Institute (API; <http://api-ep.api.org/environment/index.cfm?bitmask=002008000000000000>).

Typically, the following basic site and assessment information is necessary:

- Requested background data and maps (contact PA staff for assistance, guidance).
 1. Specify the site legal location (qtr-qtr-qtr, Sec-Twp-Rng), and street address (if any).
 2. Show the location on an aerial photo or a topographic, county road, or other appropriate map that is labeled with the site's section, township, and range.
 3. Include the Latitude/Longitude from GPS readings or other sources when available.
 4. Include a Topographic map, and area geological and hydrological data (including water table depth and water quality) if available, to help in determining possible migration pathways (see glossary Appendix VI). Soils information can be obtained from the USDA-NRCS soil survey maps and descriptions.
 5. Provide site historical data relevant to the pollutants found onsite, including materials used, transported, and/or produced in specific locations onsite (insofar as it is known) and analytical records on materials released, if available.

- Site information - Provide a short, written narrative and a site map for the following:
 1. A visual site inspection at and near the spill/impacted area (e.g. impairments seen, including damage to crops or pasture; surface soil type; hydrocarbon stains, odors, and seeps; buildings, equipment, and power lines; evidence of underground utilities or pipelines). Draw structure and observation locations on a site map.
 2. Include any relevant information from the initial spill cleanup, and/or other pertinent information, that is not included on a Field Inspector's 1085 form (PA will have a copy of the 1085 if the case originated as a new release/spill).
 3. Observable area information (e.g. agricultural or other land use; all wells and water bodies within 1320 feet; known and flagged oil and gas lines).
 4. Obtainable records, such as data on rural water lines, Oklahoma Water Resources Board (OWRB) water well records, and wellhead protection area (WHPA) maps.

- Sampling data - delineate the horizontal and vertical extent and concentration(s) of pollutants in the impacted area(s) by taking samples in, around, and under the affected soil and/or groundwater plume(s). Compare the pollutant concentrations to background or the appropriate Category level, whichever is higher.
 1. All sampling shall be:
 - a. Performed or witnessed by Commission personnel (prior notification to the Commission of sampling events is strongly encouraged), or
 - b. Performed by or under the oversight of a qualified geoscientist (see glossary), or
 - c. Performed by other qualified person(s) with appropriate and documented soil and/or water sampling training and/or experience; attach a statement on their training/experience to reports submitted.
 2. The Commission may request a copy of acceptable sampling procedures followed or to be followed during the sampling event.
 3. A field kit, field GC, soil gas analyses, or other on-site testing/screening methodology may be used to identify the impacted versus unimpacted areas, and to pinpoint the areas with the highest concentrations. However, field analysis alone is not sufficient to demonstrate whether or not Category or RBSL or SSTL (risk based screening levels or site specific target levels – see glossary Appendix VI) cleanup levels are met; confirming laboratory analytical samples are necessary (see 5a).
 4. The Commission recommends that one or more soil and water background sample(s) (unimpacted by the release - upgradient for water samples) be taken. The Commission does not require a cleanup more stringent than background levels.
 5. Sampling includes borings (or other excavations) in the site area(s) most likely to be impacted based on site screening data, visual and olfactory criteria, normal movement of liquid contaminants downhill/downgradient, and/or other information. There may be more than one release and/or impacted area per site. Sample in, around, and beneath any obvious surface contamination or pipeline break down into material that has insignificant contamination levels (background or to below the appropriate site category standard, whichever is higher), or to groundwater.
 - a. The soil or bedrock sample in each boring or grab sampling area which seems the most contaminated, based on PID/FID or other information, should be analyzed at a laboratory for Benzene (DEQ's GRO method or other approved EPA method); TPH [total GRO plus DRO or Texas method 1005 (see <http://www.tnrec.state.tx.us/permitting/analysis.htm>), extended to C₃₅, until DEQ's new TPH method is finalized]; and other appropriate constituents (e.g. an oil & grease analysis may be needed for heavy/old crude oils).
 - b. Samples from the sides and floor of an excavation, after impacted soil is removed, are necessary to determine concentrations in affected soil remaining on site. If field screening is utilized, analyze the sample(s) that appears to be the most contaminated as in 5a. For disposal or treatment of large volumes of excavated soil, analyze at least one composite sample per 50 cubic yards.³
 - c. A detailed descriptive log for each boring or excavation from the surface to total depth (TD), including changes in soil (using sand-silt-clay percentages)

³ Note – many rural landfills can only take soils up to 1000 mg/kg TPH.
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and/or rock types and apparent degree of contamination. We recommend the use of a standard classification system such as the Unified Soil Classification System or Wentworth, and the Munsel color charts.

- d. Cross-sections made from these logs showing changes across the site in soil/rock type, and contamination with depth and relative to the water table, will make the site evaluation easier.
 - e. Sampling for geotechnical parameters, for data needed for RBCA or remediation (e.g. fraction organic carbon (f_{oc}), permeability), can be collected now or in Steps 5 and 6.
 - f. Submit a table of sampling data with a map showing sampling locations.
 - g. Borings not converted to monitoring wells must be properly plugged back to surface using cement, bentonite, or other means as required by the OWRB.
6. Groundwater sampling (by qualified personnel):
- a. Unless c.i., c.ii., c.iii., or c.iv. apply, install and sample at least three properly constructed monitoring wells^{4,5} in a triangular pattern to determine both the groundwater flow direction and the extent of the plume. Sample in, around, and downgradient to any groundwater plume found down to background level, or to below the appropriate site category standard.
 - b. Because there could be more than one release/impacted area per site, additional wells must be installed where needed to insure that there are at least two wells for each separate area within a site likely to be contaminated (one in/adjacent, one downgradient).
 - c. Wells do not have to be installed if:
 - i. The groundwater table is not reached during boring/excavation, and there is at least five feet of tight clay or shale beneath the soil contamination (document the lithology and lack of permeability), or
 - ii. The groundwater table is not reached during boring/excavation, and PID/FID or analytical data for hydrocarbons (PHCs) from at least two soil/rock samples taken at least five feet (vertically) apart beneath the contamination zone show unimpacted materials, or
 - iii. The groundwater table is reached, the site is classified as a Category II or III site, pollutants have not impacted an aquifer or hydrologically sensitive area (HSA), and no contamination above (the higher of) natural background or the appropriate Category II or III levels is found in groundwater grab samples (see 6. d., below) in any of the borings, or
 - iv. The groundwater table is reached and the site is Category I or has impacted an aquifer zone or other HSA; however, no contamination above (the higher of) natural background or Category I levels is found in groundwater grab samples in any of the borings.
 - d. Grab water samples may be taken for screening purposes from borings, geoprobe holes, and other probes or excavations if groundwater is reached, but

4 All wells must be installed according to OWRB's rules by a driller holding a current OWRB Drilling/Pump Contractor's License to drill and complete geotechnical borings and monitoring wells.

5 Monitoring wells can be completed in geoprobe holes if they are properly cased, screened, sand packed as necessary, sealed, and developed.

- be aware that contaminated soil may slough into uncased holes to cause cross-contamination.
- e. Water samples should be analyzed for Benzene or BTEX⁶ (using DEQ's GRO method or other approved EPA method), TPH (see 5a), and other appropriate constituents.
 - f. A background TDS (total dissolved solids) or TSS (total soluble salts) measurement, to determine the likely assigned or default groundwater beneficial use (OAC 785:45-7-3), is necessary.
 - g. If free product has been discovered, it must be considered in any cleanup or closure proposal. An operator may choose to remove free product immediately without waiting for concurrence with a remediation proposal.
 - h. If groundwater monitoring is done, reports submitted need to include:
 - i. a comparison of the depth to groundwater/NAPL with the screened interval, to ensure that the most likely impacted zone is sampled;
 - ii. contoured plume pollutant concentration map(s);
 - iii. a groundwater flow direction map based on measured groundwater elevations in at least three wells which form a triangle; and
 - iv. if monitoring will likely exceed 1 year, submit graph(s) of groundwater elevation vs. contaminant concentrations in monitoring wells over time, annually or at requested intervals.
 - i. Before a site can be finally closed, all monitoring wells will have to be plugged and abandoned according to OWRB rules.
7. As per OWRB rules and the WQSIP (see glossary, Appendix VI):
- a. If a surface water body (see Waters of the State/Waters of the US in the glossary) is potentially impacted, water and sediment samples, as necessary, should be taken and analyzed for BTEX (using DEQ's GRO method or other approved EPA method), TPH (see 5a) and/or other appropriate constituents. Visual inspection (for oil sheen or rainbow) is also necessary.
 - b. The TDS or TSS should also be measured, and compared to OWRB surface water quality standards (OAC 785:45-5). Agricultural uses have numerical salinity standards (OWRB rules Appendix F); there is also the OWRB's narrative standard "Increased mineralization from other elements such as calcium, magnesium, sodium, and their associated anions shall be maintained at or below a level that will not restrict any beneficial use" (including fish and wildlife).

6 BTEX if in an aquifer within 330 feet of a well, or otherwise potentially endangering a water supply source.
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STEP 3 – Have the Appropriate Category Levels Been Met? See the Category Cleanup Table in Appendix I and, if the impacted site is in a Sensitive Area, the bulleted guidance below:

Make any necessary revisions to the Index Table score and appropriate Category determination following the Site Assessment (for example, if impacts exceeding Category I cleanup criteria to water are found, or if ground water was found at a different depth than predicted, the points assigned to risk factors #1 and/or #2 may change, changing the Category of the site). Then compare the sample concentrations from the assessment to background and to the appropriate Category cleanup levels in the Category Cleanup Table (Appendix I), or the Sensitive Area criteria below.

If cleanup criteria are met, confirm with PA, then go to Step 6. If cleanup criteria are not met, go to Step 4 or follow the RBCA pathway, Step 5.

- **“Sensitive Areas” with high soil contact uses (includes residential):**
 1. Sensitive Areas are the yards and gardens of homes (see glossary, Appendix VI,) plus the grounds of schools, day care centers, sports fields, playgrounds, and similar areas, if frequently accessed by vulnerable groups with high soil contact uses.
 2. Because of the potential for residents and children to have increased exposure levels via a direct soil contact pathway in these areas, the following soil cleanup criteria should be applied in or within 330 feet of Sensitive Areas.

- **“Sensitive Area” soil cleanup criteria** (based on the lowest of the human health risk, plant tolerance, and/or mobility limit numbers)
 1. Benzene – 3 mg/kg in shallow groundwater/Category I areas; 5 mg/kg otherwise.
 2. TPH - 3000 mg/kg for condensate; 2600 mg/kg for crude oil.
 3. Lower levels may be necessary if these levels create offensive odors or other nuisance problems.
 4. These criteria apply only to the shallow soil(s) that people are likely to touch. For deeper subsurface soils, see the Category Cleanup Table or perform a RBCA analysis.

STEP 4 - Consult With Pollution Abatement Staff and Decide:

Discuss what additional cleanup and/or restoration work needs to be done. Then:

- Plan to clean up to Category levels, or
- Demonstrate plume stabilization, with MNA as the “cleanup” option (see glossary, Appendix VI, and Step 6), or
- Choose the RBCA pathway (see Step 5).

If all of the work necessary to close a site cannot be done within one year, interim data, reports, and/or other information (see the submittal checklist, Appendix I) will probably be requested.

OPTIONAL RBCA PATHWAY

STEP 5 - RBCA:

A risk-based corrective action (RBCA) approach is an option for determining cleanup levels at any time in the Step 1 through Step 4 process for any or all pollutants (state explicitly which, and why). If the RBCA approach is used, it should follow established methodologies, such as ASTM RBCA (E1739), which considers a full range of petroleum constituents including both BTEX and TPH as necessary. The PA Department strongly recommends the use of the American Petroleum Institute's RBCA spreadsheet, which has been customized for the risk assessment of crude oil and condensates (<http://www.okc.state.ok.us/o&ginfo.htm>). The Petroleum Storage Tank Division's ORBCA method, which does not consider impacts from TPH, will no longer be accepted.

In general, the traditional RBCA approach is a tiered method in which the level of effort is tailored to the needs of a particular site in question. The general process steps outlined below should be followed when using the traditional RBCA approach. **For Sensitive Areas as defined in Step 3, assume a residential land use for RBCA purposes.** Consider:

- Chemicals of concern (COCs), especially benzene and TPH (and fractions, as necessary). Refer to Step 2 for basic site assessment guidelines on identifying COCs for crude oil and condensate, and Appendix V for other material(s);
- Possible migration pathways to receptors (see Figure 1 page 13 and the glossary, App. VI);
- Possible receptor exposure points (see glossary). Include direct contact with soil or water; surface water or ground water ingestion; and dust/air inhalation in a confined space, as in buildings and trenches, but not in open air;
- State water quality standards, to be met at the receptor exposure point (see the WQSIP);
- Site/area conditions including land use, topography, soil (type(s), fraction organic carbon);
- Plume stabilization, similar to Step 6, can be considered as part of a RBCA;
- Beneficial use(s) of the site (or immediate future use if transferring control of the site); and
- Other factors as necessary.

If there is more than one impacted area(s) within a large site, different RBCA evaluations may be appropriate for each one.

The default tables assume that the plume length will not exceed 300 feet, which is the case for most groundwater plumes (Characteristics of Dissolved Petroleum Hydrocarbon Plumes, Results From Four Studies, API Bulletin No. 8, December 1998). However, if the plume exceeds or is likely to exceed 300 feet, other criteria may be applied on a case-by-case basis.

The amount of cleanup and/or monitoring required depends upon the results of the RBCA.

- Compare the appropriate RBSL or SSTL levels to site COC levels. Are criteria met?
- If additional work is needed to meet the RBCA-calculated RBSLs or SSTLs, submit a plan to do the cleanup work necessary and go to Step 6.
- If the site can be closed without additional work, go to Step 7.

Tier 1 Analysis

- Develop the Conceptual Site Model (see Figure 1, and CSM in the glossary, App. VI):
 1. Conduct a site assessment to gather all necessary information.
 2. Prepare a Conceptual Site Model (CSM) to describe the site situation. The CSM may be graphical and/or narrative. An example of a graphical CSM is shown in Figure 1.
 - a. The CSM describes all pathways through which receptors might be exposed to chemicals of concern at the site. Examples of exposure pathways include direct contact and groundwater ingestion. Other pathways may be relevant, and must be included if appropriate.
 - b. Use realistic land uses (e.g., commercial, industrial, residential, agricultural).
 - c. Evaluate transport mechanisms. If necessary, collect information to verify NAPL (see glossary, App. VI) immobility, dissolved plume stability and/or the presence or absence of preferential flow pathways (e.g., utility conduits, abandoned well bores, fractured clay, etc.).
- Characterize Risk:
 1. Compare site COC levels to risk-based screening levels (RBSLs) in the Tier 1 Lookup Table. If the CSM includes any exposure pathways or receptors not included in the Table, propose and provide justification for additional RBSLs.
 2. For the soil leaching to groundwater pathway, the default Tier 1 Lookup Table assumes that the nearest water well is in the impacted area. The OK RBCA Spreadsheet may be used for calculating an alternative Tier 1 RBSL for this pathway, by setting an alternative distance to a downgradient receptor well. This would be a Modified Tier 1. **No other parameters may be changed in Tier 1.**
- Decide Risk Management Approach:
 1. If levels of COCs at the site are below Tier 1 RBSLs, submit a request for closure to the PA Department, including sufficient documentation of the site assessment, CSM and Tier 1 analysis described above.
 2. If levels of COCs are above Tier 1 RBSLs, either clean up the site to Tier 1 levels, or do a Tier 2 analysis.

Tier 2 Analysis

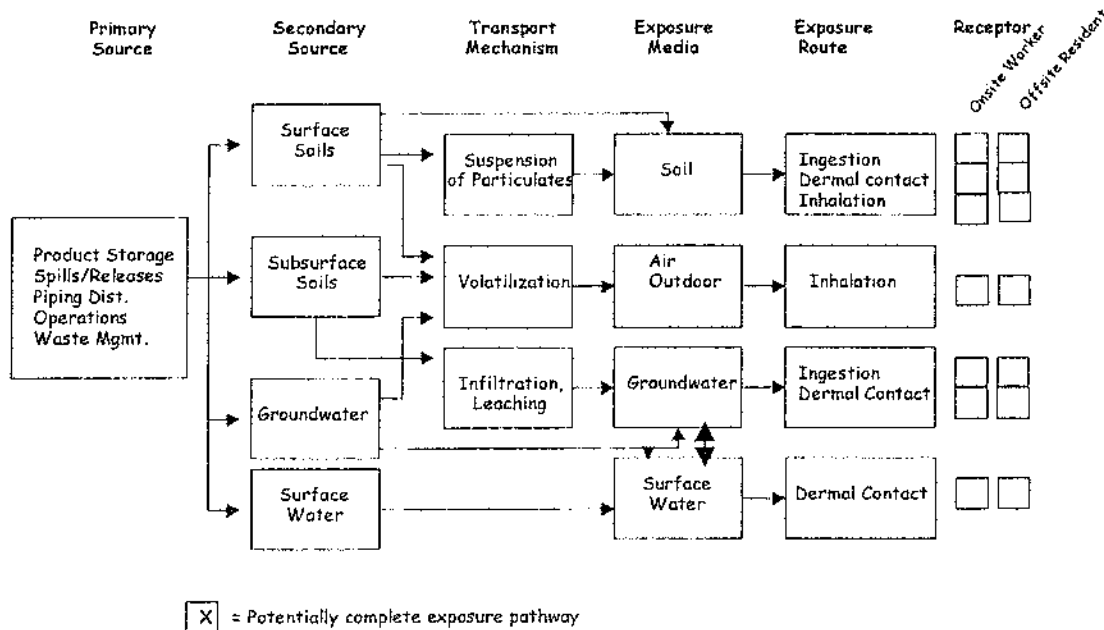
- Refine CSM: Collect additional site-specific information, if necessary, to refine the CSM developed in Tier 1 analysis.
- Characterize Risk: Calculate Tier II Site-Specific Target Levels (SSTLs). The OK RBCA Spreadsheet may be used to calculate TPH, benzene, and BTEX Tier 2 SSTLs.
- Compare site COC levels to Tier 2 SSTLs.
- Decide Risk Management Approach:
 1. If COC levels at the site are below Tier 2 SSTLs, submit a request for closure to the PA Department, including sufficient documentation of the site assessment, CSM and Tier 2 analysis (including site-specific input parameters) described above.
 2. If levels of COCs are above Tier 2 SSTLs, either clean up site to Tier 2 levels, or do a Tier 3 analysis.

Tier 3 Analysis

Tier 3 assessments, though rarely conducted, may be appropriate for very complex sites. Tier 3 assessments usually involve a sophisticated level of data analysis and use of alternative fate and transport models. Contact the PA Department prior to initiating a Tier 3 analysis.

- Refine CSM: Collect additional site-specific information to refine the CSM, if necessary.
- Characterize Risk: Conduct site-specific fate and transport analysis and risk assessment. Develop Tier 3 SSTLs and submit SSTLs along with sufficient documentation of the site assessment, CSM and Tier 3 analysis to the PA Department for approval.
- Compare site COC levels to Tier 3 SSTLs.
- Decide Risk Management Approach:
 1. If COC levels at the site are below Tier 3 SSTLs, submit a request for closure to the PA Department, including sufficient documentation of the site assessment, CSM and Tier 3 analysis (including site-specific input parameters) described above.
 2. If site COC levels are above Tier 3 SSTLs, clean up the site to the Tier 3 SSTLs.
 3. If a cleanup is for some reason impractical or technically infeasible, consult with PA staff. An Administrative Law hearing is also an option (OAC 165:10-7-4(e)).

Figure 1. Example Graphical Conceptual Site Model



TIER 1 LOOKUP TABLE

Chemical of Concern	Groundwater (mg/L)	Soil (mg/kg) Sensitive Area		Soil (mg/kg) Non-Sensitive Area		Soil (mg/kg) Oil Mobility Limit	Soil (mg/kg) ² Plant Protection Limit
		Residential Surface Soil	¹ Leaching to GW	Non-residential Surface Soil	¹ Leaching to GW		
Benzene	0.005	44	3	190	3	NA	NA
Toluene	1	6700	RES	52000	RES	NA	NA
Ethylbenzene	0.7	5400	RES	60000	RES	NA	NA
Xylenes	10	21000	RES	100000	RES	NA	NA
Total Petroleum Hydrocarbons, condensate	3	4400	RES	46000	RES	3000	10000
Total Petroleum Hydrocarbons, crude oil	3	2600	RES	41000	RES	13000	10000

RES = Target hazard index could not be reached at any concentration of this chemical.

NA = Not Applicable

1 Leaching to GW assumes that the receptor well is located beneath the source. To consider alternate well locations downgradient from the source (Tier 1a), use the Oklahoma Spreadsheet for Calculating Risk Based Screening Levels to calculate the Tier 1a RBSL.

2 The Plant Protection Limit only applies in the root zone (see glossary, Appendix VI).

Use the CSM for each site to determine which exposure pathways are complete. When using the Tier 1 Lookup Table to determine the appropriate risk-based screening level for a specific chemical or substance at a site, use the strictest (lowest) RBSL for all complete exposure pathways or the mobility limit, whichever is lower. For example, when considering a condensate spill in a non-residential area, 46,000 mg/l is the risk-based number, but 10,000 mg/l is the general plant protection limit and 3,000 mg/kg is the soil mobility limit. 3,000 mg/kg is the number which must be used. Benzene must also be analyzed at a condensate spill site. The appropriate RBSL to meet for benzene is 190 mg/kg, if leaching to groundwater is not a complete exposure pathway at the site. However, if leaching to groundwater is a pathway of concern at the site, then the appropriate RBSL is 3 mg/kg.

STEP 6 - A. Perform a Site Cleanup or Demonstrate Stabilization as Necessary:

B. Restore the site as necessary to ensure that site beneficial uses are met:

- A. Clean up – remove or remediate - the soil and/or water until the Category Cleanup Table levels (see Appendix I), or the calculated RBCA RBSLs/SSTLs, are met, to ensure that standards are met at the point of compliance (see glossary Appendix VI). Additional site assessment work to document that the requisite cleanup levels have been met may be necessary. Soil/water disposal may require permits. If there is more than one release or impacted area(s) within a large site, different levels of cleanup and/or restoration may be appropriate for each.

Or

If a cleanup is impractical/technically infeasible⁷, consult PA staff and/or request a hearing.

Or

Demonstrate stabilization (see glossary), with further remediation by natural attenuation.

1. Fully document the extent of the impacted area(s), as in Step 2.
 2. Long term monitoring can show that a groundwater plume is stable, or shrinking with natural attenuation. See EPA's OSWER Directive 9200.4-17P, and the Monitored Natural Attenuation references in the Data Sources (Appendix II).
 3. Stabilization alone is not appropriate if there are pollutant levels that could pose a health risk, or which prevent beneficial use of the site. To ensure public safety, stabilization is often combined with site institutional controls, such as a fence or deed restriction, to help prevent access to, and thus contact with, impacted soil or water.
 4. The Commission is more likely to accept the "demonstrate stabilization" option if one or more of the following is documented:
 - a. Natural microbial activity and biodegradation can sometimes be shown to be occurring at a site by sampling and analyzing for changes in water chemistry that are consistent with biodegradation as described in the Monitored Natural Attenuation references (Appendix II).
 - b. A lack of migration pathways (see definition and examples in the glossary, Appendix VI), making movement toward possible receptors very unlikely.
 - c. The absence of human or other receptors in the area, based on a receptor study, as well as no likely land/crop damage.
- B. Once site cleanup and/or stabilization efforts have been completed, the site must be restored to beneficial use(s). To get plants to grow, this may include reducing/removing toxic materials and/or making nutrients available (e.g. by applying fertilizer).

An operator may then request that a No Further Action (NFA) letter be issued. However, final site closure is dependent upon completing all regulatory (e.g. monitoring) or consent order (following a hearing) requirements, or other agreed upon actions (see closure, hearing, and monitoring in the glossary, App. VI). Interim reports and/or photographs may be requested.

⁷ Example - if an aquifer is impacted near a well and cannot feasibly be cleaned up to drinking water standards before the well is likely affected, providing a new water supply may be the best short-term solution.

When the site is ready for closure, go to Step 7.

DATA SUBMISSION AND CLOSURE REQUEST

STEP 7 – Submit Information, Request Closure. Submit necessary maps and information to the PA Department (the optional forms in Appendix VII may be used):

- A copy of the completed/ revised Index Table.
- A copy of the basic site and assessment information (see checklist Appendix I).
- Monitoring information, if any
- The data supporting closure due to:
 1. meeting category cleanup levels, or
 2. meeting the stabilization option, or
 3. meeting RBCA guidelines, without or following a cleanup.
- A request for closure stating why no further action is needed at the site.
- Documentation that the site has been restored to applicable beneficial use(s).
- Documentation that all regulatory (e.g. monitoring, proper abandonment of borings and monitoring wells), consent order, and/or other agreed upon requirements are met.
- Any other necessary information.

APPENDIX I

PA's PETROLEUM RISK FACTOR INDEX TABLE (STEP 1)

CATEGORY CLEANUP TABLE (STEP 3)

SUBMITTAL CHECKLISTS (STEPS 1 AND 7)

DECISION TREE (Complete Flow Chart)

PETROLEUM RISK FACTOR INDEX TABLE

The Table(s) needs to be reviewed, and may have to be revised, when new data is obtained.

Site Name: _____

Incident Number: _____

Legal Location: _____

County: _____

Instructions: Complete this Index Table in Step 1 even if a risk assessment is to be done. Select the risk level that is most reasonable for each risk factor at your site. **IF THE RISK FACTOR IS UNKNOWN, USE THE HIGH RISK NUMBER.** Enter the corresponding points in the box to the right. Add the points and enter the amount in the bottom right box beside "Total". If you need assistance, contact PA staff.

Risk Factors (See data sources, App. II, and the glossary, App. VI)	Low Risk	Moderate	High Risk	Score
1. Estimate quantity of oil, condensate, or oil/water mix not recovered by initial response action	< 5 barrels to soil (not recovered) 2 points	5-50 barrels to soil (not recovered) 6 points	> 50 barrels to soil or ANY amount lost to GROUND OR SURFACE WATER 10 points	
2. Distance from ground surface to groundwater table. Consider hydrologically sensitive areas (HSAs; See Appendix II)	>35 ft. and not in HSA 2 points	15-35 ft. and not in HSA, or ≥ 25 ft. in HSA 6 points	<15 ft.; or <25 ft. in HSA; or contam. soil IN CONTACT WITH surface/ground WATER 10 points	
3. Distance to nearest potable water well from edge of visibly impacted soil; wellhead protection area (WHPA)	> 1320 ft., not in WHPA 2 points	330 to 1320 ft., not in WHPA 6 points	< 330 ft. not in WHPA, or in WHPA 10 points	
4. Background groundwater quality	TDS > 5,000 mg/l 0 points	TDS 1,000-5,000 mg/l 4 points	TDS < 1,000 mg/l 8 points	
5. Predominant soil/rock type in impacted area(s), or "confining layer", between release zone and groundwater,	Tight ⁷ soil, or "unfractured clay or shale layer > 1 ft. thick" 0 points	Silt, clay/silt/sand mixtures ⁸ 4 points	Sand, gravel, fractured clays ⁷ ; shallow porous/fractured bedrock 8 points	
6. Average annual precipitation, inches	< 28 0 points	28-40 4 points	> 40 8 points	
39-54 points: Category I; 22-38 points: Category II; 6-21 points: Category III				TOTAL

In the lines below, summarize how and why the risk levels were chosen for each risk factor. Refer by number:

Name and title of person filling out the table: _____

Signature and date: _____

8 FYI - The permeability for tight soils is usually $\leq 10^{-6}$ cm/sec; for silts and mixtures (Unified Soil Classifications ML, OL, SM, GM, or MH) permeability is in the 10^{-3} to 10^{-6} cm/sec range; and for sand/gravel/fractured clays it is $\geq 10^{-3}$ cm/sec.

CATEGORY CLEANUP TABLE¹

	Category III	Category II	Category I
Index Table Score	6-21 points	22-38 points	39-54 points
Chemical of Concern	Maximum levels for NonSensitive Area/NonResidential Soils^{2,3,7}		
Benzene ⁴	31 mg/kg if ≤ 330 ft. to drinking water (DW) supply 310 mg/kg if > 330 ft. to DW supply	23 mg/kg if ≤ 330 ft. to DW supply 230 mg/kg if > 330 ft. to DW supply	3 mg/kg
TPH from Condensate	10,000 mg/kg ≤ 2 ft. deep, 20,000 mg/kg > 2 ft. deep (Total TPH)	5,000 mg/kg ≤ 3 ft. deep, 10,000 mg/kg > 3 ft. deep	3,000 mg/kg
TPH from crude oil		10,000 mg/kg	5,000 mg/kg
Chemical of Concern	Maximum levels, for Groundwater⁵ The Category I criteria for water apply to all Categories when <u>in an aquifer within 330 ft. of a drinking water well.</u>		
Benzene or BTEX	0.5 mg/l benzene	0.05 mg/l benzene	MCLs B/T/E/X mg/l 0.005/1/0.7/10
Maximum TPH	No measurable free product	25 mg/l	3 mg/l; the Commission may request a cleanup down to 0.1 mg/l ⁶ for a spill affecting a DW supply

1. Alternate levels are acceptable under special circumstances, with Commission concurrence. For example, less stringent cleanup limits for soils at historic pollution sites that have stabilized and are naturally attenuating, if beneficial uses are met. However, more stringent limits may be requested if the defined category cleanup levels create nuisance or other problems.
2. For **Sensitive Areas** (homes, schools, etc.) with high soil contact uses, see Step 3 page 10.
3. If impacted soil is in contact with ground water or surface water (excepting unused perched non-aquifer zones), lower soil concentrations of TPH or benzene are appropriate.
4. No levels are set for toluene, ethylbenzene, or xylenes in soils since risk-based criteria for these compounds are above what would be present from all oils and condensates analyzed at the benzene and TPH levels listed.
5. Surface waters must meet OWRB standards. See the Oil & Gas Division's Water Quality Standards Implementation Plan (WQSIP) guidance (see glossary Appendix VI).
6. The EPA's drinking water SNARL (see glossary, App. VI) limit for petroleum/TPH from a fresh source is 0.1 mg/l.
7. 1000 mg/kg TPH is the usual limit for soil to be taken off-site to a landfill or used within the lease for berms etc.

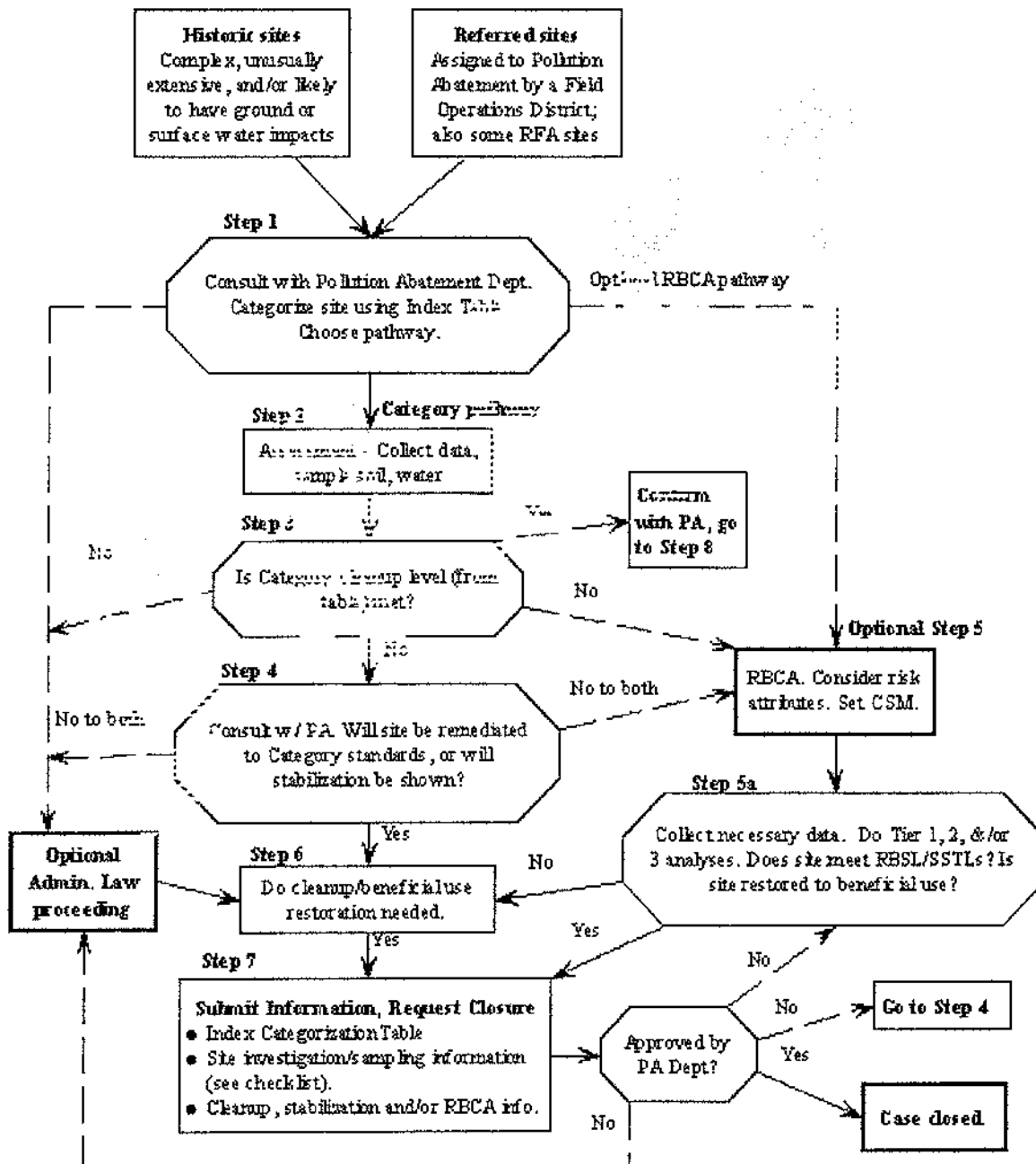
OPERATOR'S SUBMITTAL CHECKLIST (FOR STEPS 1 AND 7⁹)

Place a check mark beside each item submitted (or completed, even if no written submittal is needed)

Step	Submitted/Completed	Report Reference
1	<input type="checkbox"/> Petroleum Risk Factor Index Table, with explanations and signature. <input type="checkbox"/> Notify PA staff as to path chosen (Category, RBCA, Hearing).	
7	BASIC SITE AND ASSESSMENT INFORMATION FOR MOST SITES	
	<input type="checkbox"/> Index Table, if modified after initial submission or not previously submitted.	
	<input type="checkbox"/> Information from initial spill & cleanup (information not already on Field Ops 1085 form).	
	<input type="checkbox"/> Site map with facilities, utilities, pipelines, impacted area, etc. shown.	
	<input type="checkbox"/> Area maps and photos available – mark the site location on one map that shows section #s. <input type="checkbox"/> topographic <input type="checkbox"/> soil <input type="checkbox"/> hydrogeological <input type="checkbox"/> wellhead protection area <input type="checkbox"/> aerial photo other: _____	
	<input type="checkbox"/> Written narrative covering site/area activities and observations (description of land use; wells/surface waters; soils; stains, odors, or other, impacts to soil/water/plants/animals, etc.)	
	<input type="checkbox"/> Map showing sampling locations. Include screening information, observations, rationale.	
	<input type="checkbox"/> Table (preferred) or listing of soil and water analytical results, and copies of lab analyses.	
	<input type="checkbox"/> Boring/excavation logs. Cross-sections if made.	
	<input type="checkbox"/> Other relevant information.	
	IF MONITORING WELLS ARE INSTALLED	
	<input type="checkbox"/> Well installation information.	
	<input type="checkbox"/> Table (preferred) or listing of water sample analytical results, and copies of lab analyses.	
	<input type="checkbox"/> Groundwater elevation measurements, and a map showing flow direction(s).	
	<input type="checkbox"/> Free product information and measurements, and a plan to deal with it.	
	<input type="checkbox"/> TDS or TSS for waters sampled.	
	<input type="checkbox"/> Contoured groundwater plume map(s); depth/time/concentration graphs as necessary.	
	FOR CATEGORY PATHWAY SITES	
	<input type="checkbox"/> Compare Category cleanup levels to site impact levels. Are numerical criteria met? or	
	<input type="checkbox"/> Data to show plume is stable (sample all around to background/Category level). Options: <input type="checkbox"/> Bioenhancement activities or evidence of remediating bacteria/byproducts <input type="checkbox"/> Institutional controls, if any <input type="checkbox"/> Absence of receptors or pathways.	
	FOR RBCA PATHWAY SITES	
	<input type="checkbox"/> Data documenting the RBCA processes, how RBSLs or SSTLs were calculated.	
	<input type="checkbox"/> RBSLs and/or SSTLs comparison to site COC levels.	
	IF A CLEANUP AND/OR RESTORATION FOR BENEFICIAL USE WAS DONE	
	<input type="checkbox"/> Cleanup information, if any, with post-completion sampling results to show the site now meets appropriate Category or RBCA calculated levels.	
	<input type="checkbox"/> Post-action monitoring, if needed to document cleanup conditions and/or restoration.	
	INFORMATION AND DOCUMENTATION NEEDED TO ACHIEVE CLOSURE	
	<input type="checkbox"/> A request for closure stating why no further action is needed at the site.	
	<input type="checkbox"/> Documentation that the site has been restored to beneficial use(s).	
	<input type="checkbox"/> Documentation that all regulatory (e.g. monitoring, proper abandonment of borings and monitoring wells), consent order, and/or other agreed upon requirements are met.	

⁹ Data and reports will be requested prior to Step 7 if all of the work required to close a site cannot be done within one year.
 Oklahoma Corporation Commission

DECISION TREE (Complete Flow Path)



APPENDIX II

DATA SOURCES AND RELATED ENVIRONMENTAL RESOURCES

DATA SOURCES AND RELATED ENVIRONMENTAL RESOURCES

District Information and Reporting Spills:

Spill reporting and immediate cleanup guidance is covered in the "What the Oil & Gas Industry Should Know About Reporting and Responding to Spills In Oklahoma" brochure, available in District offices, from Oil & Gas Associations, or on the web at [ftp://204.87.70.98/OCCFILES/Responseteam/spill\(b\).html](ftp://204.87.70.98/OCCFILES/Responseteam/spill(b).html)

To determine the appropriate district for reporting a spill or soil-only historically impacted site, or to obtain field inspector areas and pager numbers for reporting, go to <ftp://204.87.70.98/occfles/responseteam/prthome.html>. Click on spills, scroll down to the map, and then click on the appropriate District.

To report historically impacted sites that are complex and/or unusually extensive, or that involve possible surface water or ground water impacts:
PA Department, Oklahoma City, 405-521-3085

For spills to navigable Waters of the US:
U.S. Coast Guard National Response Center (24 hour): 800-424-8802

For spills that affect surface water in the watershed of a water supply lake:
OK Department of Environmental Quality (24 hour): 800-522-0206

For spills affecting fish or wildlife:
OK Department of Wildlife Conservation: 405-521-4616 (8-4:30), 405-990-5048 (after hours)

Aerial Photographs:

a) Photocopies can be obtained from the local USDA-Farm Service Agency at a cost of \$1.00 each. Local offices can be found at:

<http://www.fsa.usda.gov/edso/statedefault.htm>

b) Print them from the Terraserver website:

<http://terraserver.homeadvisor.msn.com/advfind.asp?W=0>

c) Download them from Geo Information Systems website (.bil or .sid files; need software such as ArcView or Mr. Sid Geoviewer or the USGS dlgv32 to view):

<http://www.geo.ou.edu>

d) Ace Aerial Photography, 132 N.W. 67, Oklahoma City, OK 73116 (405) 842-3456.

f) USGS - order online at:

<http://www.usgs.gov>

g) National Archives and Records Administration, Cartographic and Architectural Branch. Outline the area you are interested in on a topographic map and FAX to Jerry Luchansky at (301) 713-7488. Within 2-3 weeks, he will send you a list of vendors from which you can order the aerial photo.

American Petroleum Institute Environmental Guidance Documents:

<http://api-ep.api.org/environment/index.cfm?bitmask=002008000000000000>

Average Annual Precipitation:

See Appendix IV or Figure 7 at:

http://www.owrb.state.ok.us/ocwp/4water_relatedres2.pdf

Environmental Consultants and Laboratories:

A list of environmental consultants and laboratories is available at <ftp://204.87.70.98/ocfiles/responseteam/prthome.html>; click on Environmental Directory

GIS; viewing maps and other images:

<http://www.grime.net> lists a wide variety of maps and images available, and tells you what programs are needed to view each type of map/format.

Hydrologic Atlases (for area groundwater depths and quality, and geologic information):

Order from the Oklahoma Geological Survey, Publications Department, 100 E. Boyd, Room N-131, Norman, OK 73019-0628, (405) 360-2886.

<http://www.ou.edu/special/ogs-pttc/plpubs.htm>

Latitude and Longitude Information:

a) Make field readings on a GPS unit.

b) Obtain the lat/long of a wellsite from Geo Information Systems website; you need to know the name of the well or its legal description (qtr-qtr-qtr, Sec-Twp-Rng format).

<http://www.geo.ou.edu/> - subscription required

c) Lat/long of the center of a section is available by converting from legal description (Sec, Twp, Rng) on the TRS-data website:

<http://www.esg.montana.edu/gl/trs-data.html>

Natural Attenuation References:

Air Force Center for Environmental Excellence. 1998. Technical Protocol For Implementing Intrinsic Remediation With Long-Term Monitoring For Natural Attenuation Of Fuel Contamination, Volumes I and II (A324248, A324247a, A324247b): Technology Transfer Division, San Antonio, Texas. <http://www.afccc.brooks.af.mil/er/ert/natural.htm>

American Society for Testing and Materials, 1998. Standard Guide for Remediation of Ground Water by Natural Attenuation at Petroleum Release Sites. ASTM E-1943-98. pp. 875-916.

Buscheck, Timothy E.; O'Reilly, Kirk T.; Nelson, Sheldon N. 1993. Evaluation Of Intrinsic Bioremediation At Field Sites. Proceedings: Petroleum hydrocarbons and organic chemicals in ground water; prevention, detection, and restoration. Houston, TX; Nov. 10-12.

Buscheck, Timothy E.; Alcantar, Celia M. 1995. Regression Techniques And Analytical Solutions To Demonstrate Intrinsic Bioremediation. Bioremediation. 3 Vol. 1. Battelle Press, Columbus, OH, United States. pp. 109-116.

U. S. Environmental Protection Agency. 1999. Final OSWER Monitored Natural Attenuation Policy (OSWER Directive 9200.4-17P). United States Environmental Protection Agency, Office of Solid Waste and Emergency Response.

<http://www.epa.gov/swerust1/directiv/d9200417.htm>

United States Environmental Protection Agency, Office of Solid Waste and Emergency Response (US EPA OSWER). April 1999. Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites. OSWER Directive 9200.4-17P.

<http://www.epa.gov/swerust1/directiv/d9200417.htm>

OWRB:

Aquifer maps; water quality; boring and monitoring well/driller rules.

Go to your local OWRB office, or

<http://www.state.ok.us/~owrb/rules/Rules.html>

Rainfall Data:

Free data for the general public is at:

<http://www.mesonet.ou.edu/public>

Detailed data and maps, and historic data, is by account only. To set up an account, see

<http://www.mesonet.ou.edu/gettingdata>

RBCA Spreadsheet:

<http://www.occ.state.ok.us/o&ginfo.htm>

Soil Surveys:

Soil surveys are available at the local offices of the USDA-NRCS. A list of addresses and phone numbers of those offices can be accessed by going to the following website and clicking on "Personnel Directories":

<http://www.ok.nrcs.usda.gov>

Topographic Maps:

a) Purchase from Triangle A&E, 7201 Broadway Extension, Oklahoma City, OK 73116, (405) 848-4661.

b) Purchase from USGS on their website:

<http://mcmweb.er.usgs.gov/topomaps>

c) Print from the Topozone or Terraserver websites:

www.topozone.com (search by name, decimal degree or degree/min/sec latitude/longitude, UTM coordinates) or

<http://terraserver.homeadvisor.msn.com/advfind.asp?W=0>

d) Download from Geo Information Systems website (.tif files; can be viewed using Word 2000, Paint, PowerPoint, ArcView, or the USGS dlv32)

Unified Soil Classification System tables:

a) ASTM: <http://www.hydro.unr.edu/homepages/benson/classes/hydro/uscs.html>

b) US Army Corps of Engineers: <http://www.adtdl.army.mil/cgi-bin/atdl.dll/fm/5-410/Ch5.htm>
Table 5-4 page 9 (legal size print).

WHPAs (Wellhead Protection Areas):

Obtainable from your local water system office, the area DEQ office or:

<http://www.deq.state.ok.us>

WQSIP (Water Quality Standards Implementation Plan):

On the Commission's web site at

http://www.occ.state.ok.us/TEXT_FILES/WQSIP_05c.htm

APPENDIX III
HYDROLOGICALLY SENSITIVE AREAS
FROM HYDROLOGIC ATLASES (HAs)¹⁰

While this Appendix lists only major named hydrogeologically sensitive areas, which are shown at the ground surface on Hydrologic Atlases¹⁰, other hydrologically sensitive areas as defined in the glossary or shown on OWRB maps (OWRB Technical Report 99-1, Statewide Groundwater Vulnerability Maps of Oklahoma) as vulnerable aquifer recharge zones should also be protected. See HSA in the glossary, Appendix VI, for additional information.

¹⁰ HA maps are the Oklahoma Geological Survey Hydrologic Atlas Quadrangles
Oklahoma Corporation Commission

EASTERN OKLAHOMA

MAP HA-2 TULSA

Qal Alluvium
Qt Terrace Deposits
IPbv Barnsall & Vamoosa Fm
IPt Torpedo Fm
IPch Chanute Fm
IPsn Senora Fm & Chelsea Ss
IPbj Bluejacket Ss
Mkr Keokuk & Reeds Spring Fms
MDO Chattanooga, Fernvale, Fite, Tyner,
Burgen, & Cotter Fms

MAP HA-1 FORT SMITH

Qal Alluvium
Qt Terrace Deposits
IPsl Seminole Fm
IPCV Calvin Ss
IPsn Senora Fm
IPt Thurman Ss
IPbj Bluejacket Ss
IPsv Savanna Fm
IPmh McAlester & Hartshorne Fms

MAP HA-9 McALESTER

Qal Alluvium
Qt Terrace Deposits
Ko Ozan Fm
Kbr Brownstone Marl
Kto Tokio Fm
Kw Woodbine Fm
Kgb Grayson Marl & Bennington Ls
Kpm Pawpaw Ss
Ka Antlers Ss
Kh Holly Creek Fm
IPt Thurman Ss
IPbj Bluejacket Ss
IPsa Savanna Fm
IPha Hartshorne Ss
IPjf Jackfork Group
Sb Blaylock Ss
Ow Womble Fm
Ob Blakely Ss
Ocm Crystal Mountain Ss

CENTRAL OKLAHOMA

MAP HA-4 OKLAHOMA CITY

Qal Alluvium
Qt Terrace Deposits
Pm Marlow Fm
Pd Duncan Ss
Pch Cedar Hills Ss
Pp Purcell Ss
Pk Kingham Slt

Pg Garber Ss
Pw Wellington Fm
IPv Vanoss Group
IPa Ada Group
IPva Vamoosa Fm
IPta Tallant Fm

IPbd Barnsdall Fm
IPch Chanute Fm
IPs Seminole Fm
IPw Wewoka Fm
IPca Calvin Ss
IPsc Senora Fm
IPt Thurman Ss

MAP HA-7 ENID

Qai Alluvium
Qt Terrace Deposits
Pch Cedar Hills Ss
Pbi Bison Fm
Psp Salt Plains Fm
Pk Kingman Silt

MAP HA-7 ENID

Pg Garber Ss
Pw Wellington Fm
IPa Ada Group
IPva Vamoosa Group
IPt Tallant Fm
IPbd Barnsdall Fm
IPch Chanute Fm

MAP HA-3 ARDMORE

Qal Alluvium
Qt Terrace Deposits
Kw Woodbine Fm
(Kwt Templeton)
(Kwr Red Branch)
(Kwd Dexter)
Ka Antlers Sd
Pr Rush Springs Fm
Pm Marlow Fm
Pd Duncan Ss
Pp Purcell Ss
Pg Garber Ss
Pw Wellington Fm
IPa Ada Fm
(Collins Ranch Cgl)
IPva Vamoosa Fm
IPca Calvin Ss
IPsc Senora Fm
IPt Thurman Ss
IPbj Bluejacket Ss
IPsa Savanna Fm
IPha Hartshorne Ss
IPjf Jackfork Ss

WESTERN OKLAHOMA

MAP HA-8 WOODWARD

Qal Alluvium
Qt Terrace Deposits
To Ogallala Fm
Kk&Kd Kiowa Fm and Dakota Group
Pdy Doxey Fm
Pcc Could Chief Fm
Fwh White Horse Group
(Pr Rush Springs Fm)
(Pm Marlow Fm)
Pch Cedar Hills Ss
Pbi Bison Fm
Psp Salt Plains Fm
Pk Kingman Fm

MAP HA-5 CLINTON

Qds Dune Sand
Qal Alluvium
Qt Terrace Deposits
To Ogallala Fm
Kk&Kd Kiowa Fm and Dakota Group
Pec Elk City Ss
Pdy Doxey Fm
Pcc Cloud Chief Fm
Pwh White Horse Group
(Pr Rush Springs Fm)
(Pm Marlow Fm)
Pch Cedar Hills Ss
Pd Duncan Ss
Pbi Bison Fm

MAP HA-6 LAWTON

Qal Alluvium
Qds Dune Sand
Qt Terrace Deposits
Pwh White Horse Group
Psa San Angelo Ss
Ppo Post Oak Cgl
Pg Garber Ss

MAP HA-450 BEAVER CO.

Qd Dune Sand
Qa Alluvium
To Ogallala Fm

MAP HA-373 CIMARRON CO.

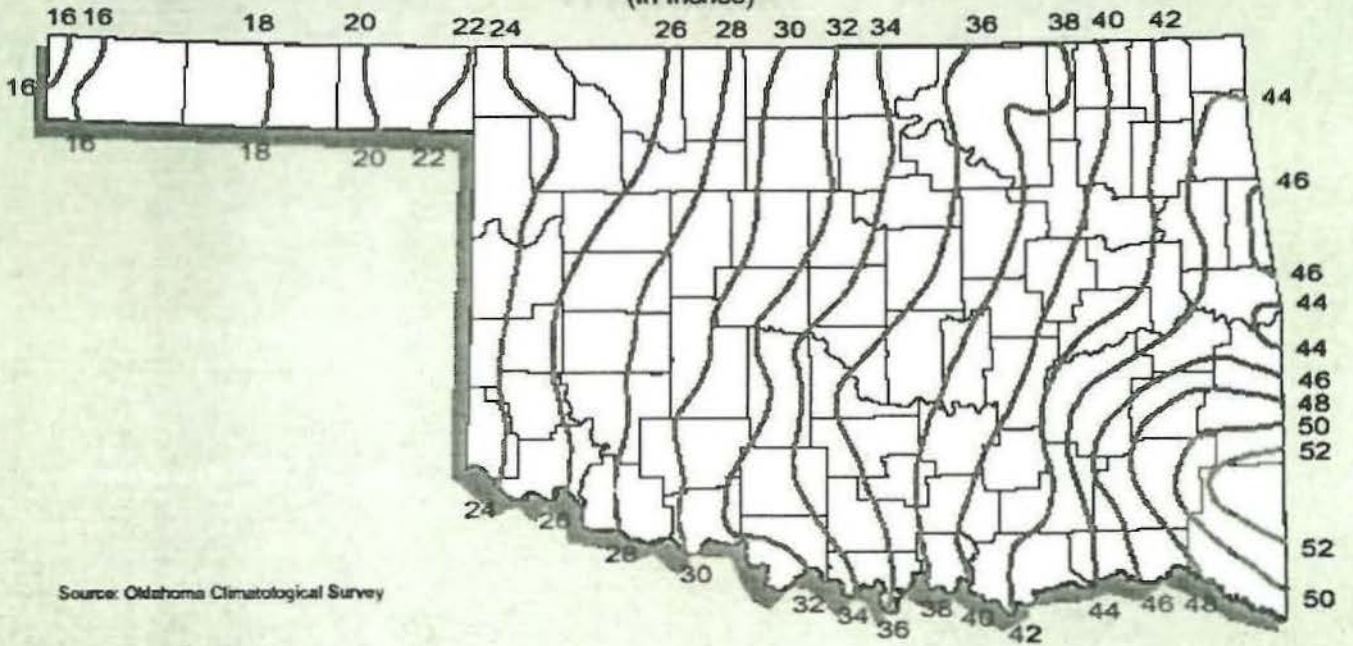
Qd Dune Sand
Qa Alluvium
To Ogallala Fm
KC Greenhorn Ls
(Colorado Group)
Kd Dakota Ss
Kp Cheyenne Ss
(Purgatoire Fm)
Jm Morrison Fm
Je Exeter (Entrada) Ss
Td Dockum Group

MAP HA-250 TEXAS CO.

Qd Dune Sand
Qa Alluvium
To Ogallala and Laverne Fms

APPENDIX IV
RAINFALL MAP OF OKLAHOMA

Figure 7
AVERAGE ANNUAL PRECIPITATION 1961-1990
(In Inches)



Source: Oklahoma Climatological Survey

APPENDIX V

GUIDANCE FOR SPILLS OF OTHER MATERIALS FROM PIPELINES, TANK
FARMS, AND PRODUCTION/TREATMENT EQUIPMENT

GUIDANCE FOR SPILLS OF OTHER MATERIALS FROM PIPELINES, TANK FARMS, AND PRODUCTION/TREATMENT EQUIPMENT

The Oil and Gas Conservation Division also oversees the cleanup of spills and leaks of substances other than crude and condensate. These include:

- Ammonia (NH₃) Most should dissipate in the atmosphere fairly quickly (explosion precautions should be taken and breathing and skin protection worn as needed). In soil, ammonia leaked from pipelines will bind to the soil if there is moisture available. The pH will change as NH₃ levels increase. Crops and soil bacteria may be killed. Compounds corrosive to equipment can also be created. The possible effects of remnant ammonia on soil and vegetation or roots, and in nearby surface waters, where an excess nutrient level can cause algal blooms and suffocate fish, should also be considered in any remediation plan.
- Brine See the Field Operations spill guidance and the WQSIP water quality criteria, Section II (available at http://www.occ.state.ok.us/TEXT_FILES/WQSIP_05c.htm); and Step 2, Sampling, #6f and #7b, above.
- Diesel Usually in the C₁₂ to C₂₄ carbon range. Use the crude oil TPH cleanup number from the cleanup table, for Sensitive Areas, or from RBCA calculations.
- Gasoline Similar to light condensates, except that oxygenates like MTBE will also have to be addressed.
- Glycol Readily biodegradable if the right bacteria and conditions are present.
- Jet Fuel Its carbon range overlaps the border between condensate and crude. The lowest TPH cleanup number of either condensate or crude in the Cleanup Table, Sensitive Areas, or from RBCA calculations, should be used.
- Kerosene Its main C₉ to C₁₆ range overlaps the border between condensate and crude. The lowest TPH cleanup number of either condensate or crude in the Cleanup Table, Sensitive Areas, or from RBCA calculations, should be used.
- Natural Gas Most hydrocarbons in this carbon range should dissipate in the atmosphere fairly quickly (explosion precautions should be taken and breathing protection worn as needed). Liquids remaining behind will be condensate. Oxygen in the soil may have been displaced by the methane/natural gases, killing the normal bacterial populations and making bioremediation more difficult. Plants will often die also. If this occurs, returning the site to a natural state should be part of the remediation and beneficial use restoration.

APPENDIX VI

GLOSSARY AND ACRONYMS

GLOSSARY AND ACRONYMS

While most technical terms used by the Commission are defined in the rules (OAC 165: 10-1-2), this guidance document uses some that are not. A list of these is below.

- API** means American Petroleum Institute.
- API Gravity** means the American Petroleum Institute method for identifying the specific gravity of crude oil or condensate.
- Aquifer** means a geological formation or part of a formation or sedimentary zone or fracture system that is capable of yielding a significant amount of water to a well or a spring (commonly ≥ 1 gallon per minute sustained yield) that is sufficient for year-round daily domestic use, or for seasonal agricultural use.
- BTEX** means *benzene, toluene, ethylbenzene, and xylenes*, which are often the main chemicals of concern at petroleum release sites. The EPA sets the maximum contaminant levels (MCLs) allowed in drinking water for these compounds.
- Closure** means that all assessment, cleanup, and restoration activities at a site are complete, with documentation showing that all 1) regulatory requirements (e.g. monitoring if needed to demonstrate that cleanup or restoration activities have been effective (OAC 165:10-7-4(d)); the plugging of wells and borings (if any) to OWRB standards; copies of land application permits or waste disposal run tickets for soil and/or water removed from the site (OAC 165:10-7-24, 10-7-26, 10-7-27)), 2) hearing consent orders (OAC 165:10-7-4(e)), or 3) other agreed upon actions have been met/complied with. PA will issue a closure letter upon request when it concurs.
- COC (Chemical of Concern)** means a chemical that has the potential to negatively impact human health and/or the environment at a site (a.k.a. pollutant).
- Complex and/or unusually extensive** - Spills at most sites involve limited petroleum hydrocarbon or brine impacts to soil near the wellhead, flowlines, or tanks. Complex and/or unusually extensive sites are those that a) involve several different substances; and/or b) involve impacts to surface water or ground water or bedrock, not just soil; and/or c) affect a relatively large area (e.g. from a large volume tank or pipeline break, or the fluid flowed a long way downhill).
- Consent Order** See Hearing.
- CSM** means Conceptual Site Model. This describes the site in a graphical and/or narrative fashion, taking into consideration site conditions and the likely fate and transport of the COCs. A CSM identifies the potential ways that people may be exposed to

COCs.

CWA means the federal *Clean Water Act* and amendments thereto. Section 303(d) requires states to identify waters of the US that do not and are not expected to meet applicable water quality standards, and report them to EPA; this is sometimes referred to as the 303(d) List. States must also establish priority rankings for the listed waters, taking into account impact severity and designated beneficial uses of the waters.

DEQ means the Oklahoma *Department of Environmental Quality*.

DRO means *Diesel Range Organics*, a measure of the Total Petroleum Hydrocarbons in the C11-C28± range. DEQ's extraction procedure is method 8000/8100M; see <http://www.deq.state.ok.us/CSDnew/LabCert/DEQDROv4.1.pdf>

DW supply means *drinking water supply*.

EPA means *US Environmental Protection Agency*.

Exposure Assessment means a three-step process in which the exposure setting is characterized, complete exposure pathways are identified, and the magnitude of the potential exposure is estimated.

Exposure Pathway means the path via which a person or other receptor may be exposed to a chemical of concern; see migration pathway. Examples include inhalation of vapors, direct contact with contaminated soil, and swimming in or drinking polluted water. Dust/air inhalation is usually considered only in a confined space (building, trench) where it can concentrate instead of dispersing as it does in open outdoor air.

FID means *Flame Ionization Detector*. Gas is drawn into the instrument, which responds to any molecule with a carbon-hydrogen bond. A flame in the instrument ionizes the molecules. Negative ions are attracted to a collector electrode, producing a signal that is read as a concentration level.

f_{oc} means *fraction organic carbon* in soil – see organic carbon.

Free product means a measurable level of petroleum hydrocarbon on the ground surface or on surface water, or on ground water.

GC means *Gas Chromatograph*, equipment used for the separation of mixtures of compounds by partition between a mobile gas phase and a stationary liquid phase.

Geoscientist means a degreed geologist (defined 25 O.S. § 35), soil scientist (meeting OAC 165:10-7-19), or engineer (defined 59 O.S. Sup. 1999 Sections 475.1-475.22b) with

appropriate soil science and/or geology and/or ground water hydrology education and training, plus appropriate experience, for soil and/or water sampling.

GRO means *Gasoline Range Organics*, a measure of the TPH in the C6-C11± range, measured according to EPA method 8015/8020M.

Ground water means water found under the Earth's surface in soil or rock pores and fractures. Not all ground water is found in aquifers, and not all ground water receives the same protection or cleanup efforts.

HA means *Hydrologic Atlas*, a compendium of maps in specific geographic areas that delineate the groundwater depths, water quality, and geologic information about the area. Published by the Oklahoma Geological Survey.

Hearing, a.k.a. Administrative Law Hearing means a hearing held before a Commission Administrative Law Judge, as called for in OAC 165:10-7-4(e), when there is disagreement over what should be done at a site. A hearing may be requested by Pollution Abatement or an operator or a complainant. This usually results in a consent order delineating the work that must be done at a site.

Historically Impacted Site means a site that is not the result of a recent spill. It can be 1) an old spill site that was not adequately cleaned up, or 2) one that has site impacts resulting from practices that once were legal but which have resulted in a pollution problem(s), or 3) one that has pollution from unknown sources. Although not subject to the 24-hour spill/release reporting rule, these sites still should be reported and must be cleaned up and/or restored to beneficial use.

Homes means single and multifamily houses, condominiums, apartments, nursing homes, manufactured homes, etc. occupied more than 8 hours per day, 300 days per year, by adults and/or children.

HSA means Hydrologically Sensitive Area, a.k.a. Hydrologically Vulnerable Area. An HSA is an area in which the ground water or surface water could easily be impacted by a spill. HSAs include 1) a principal bedrock aquifer, the recharge or potential recharge area of a principal bedrock aquifer, or an unconsolidated alluvium or terrace deposit, according to the Oklahoma Geological Survey "Maps Showing Principal Groundwater Resources and Recharge Areas in Oklahoma"; 2) small undefined or unnamed sensitive/vulnerable alluvium & terrace deposits near streams (potential migration pathways to streams); and/or 3) the vulnerable aquifer recharge zones defined by the OWRB in OWRB Technical Report 99-1, Statewide Groundwater Vulnerability Maps of Oklahoma.

Liner means compacted soil/clay or an artificial geomembrane thick enough and

impermeable enough that fluids will not likely go through it. Similar to soil or geomembrane liner for a pit [OAC 165: 10-9-1 (e)(7, 8)].

MCL means the *Maximum Contaminant Level* allowed in drinking water, as defined by the EPA (<http://www.epa.gov/OGWDW/mcl.html>).

Migration Pathway means a route by which substances can move from a source to a receptor. A pathway can be a) natural, such as movement with groundwater through interconnected soil or bedrock pores and fracture zones, or b) a man-made conduit, such as along an underground utility line. Examples of possible migration pathways include adjacent surface water, groundwater in local aquifer zones, abandoned well bores, porous soil, or fractured bedrock zones, shrink/swell clay cracks or fissures, underground utility line/pipeline underflow, etc.

Monitoring means collecting evidence, including sampling data and/or photographs as necessary, for ± 1 year (OAC 165:10-7-4(d)), to ensure and document that cleanup and/or restoration actions taken have been effective and that the site is ready for closure.

NAPL means *nonaqueous phase liquid*, a liquid other than water that exists in the subsurface environment, and does not all dissolve into the water. See free product.

No further action (NFA) means that all necessary assessment, cleanup, and restoration actions are complete. PA will issue an NFA letter to an operator upon request when it concurs. However, final site closure is dependent on meeting all regulatory, consent order, or other agreed upon requirements (see Closure).

Oil and Grease means an analysis of the amount of relatively nonvolatile hydrocarbons (as well as vegetable oils, animal fats, waxes, soaps, greases, and related materials) in a sample. The analysis is performed using a solvent on an aqueous or solid sample (water or soil sample, usually), extracting a solute, which is then measured by gravimetric analysis.

Organic Carbon means the quantity of organic carbon in a soil sample as measured by wet oxidation of the sample. Once the total organic carbon is known, the weight percent or fraction organic carbon (f_{oc}) used in RBCA calculations can be determined.

OWRB means the *Oklahoma Water Resources Board*, the state agency that sets the Oklahoma water quality standards the Commission must enforce. The OWRB also sets the rules for borings, monitoring and water wells, and licenses those persons allowed to drill, install, and properly abandon them.

PA means the Pollution Abatement Department within the Oil & Gas Conservation Division.

- PID** means *Photo-ionization Detector*. Gas is drawn into the instrument, where an ultraviolet bulb at a specific ev (electro-volt) level excites and ionizes the atoms of volatile organic compounds. Ions are attracted to a collector electrode, producing a signal that is read a concentration level.
- Plume** means the pollutant's impact area. Most commonly applied to the area of an impacted ground water or surface water body that is generally moving downstream or downgradient from the source.
- Pollutant** means any material or substance that is present in water or soil at levels that may cause pollution impact(s). COCs (chemicals of concern) are often the pollutants referred to in a RBCA.
- Pollution** means (from Corp Comm O&G rules) the "contamination of fresh water or soil, either surface or subsurface, by salt water, mineral brines, waste oil, oil, gas, and/or other deleterious substances produced from or obtained or used in connection with the drilling, development, producing, refining, transporting, or processing of oil or gas within the State of Oklahoma".
- Point of Compliance** means the spill source area for the cleanup standards (Category cleanup levels or RBCA calculated RBSL/SSTLs); also means the receptor point for the Commission's enforcement of the state water quality standards.

Potable water means *water from wells or other sources usable for human consumption*. By OWRB rules (OAC 785:45-7-3), PPWS (public and private water supply) wells includes those from ground water with TDS <3000 mg/l (ppm), and water from Special Source Aquifers regardless of TDS.

RBCA means *Risk Based Corrective Action*, a tiered decision-making approach for site assessment, risk assessment, and site management. This is a methodology for 1) determining the health risks from specific (analytically measured) concentrations of petroleum compounds in various media (soil, water, and air) at specified locations, and 2) determining the cleanup standards to be used, and the remediation necessary, at impacted sites.

RBSL means *Risk-Based Screening Level*, the chemical-specific concentration in environmental media that is considered to be protective of human health and the environment.

Receptor means a human or critical (essential) animal that can be sickened, injured or killed by any potentially harmful substance(s) released.

Receptor point (Receptor exposure point) means the location in space [e.g., point, area, or critical (essential) animal habitat], where a receptor may come in contact with a potentially harmful substance by, for example, inhaling vapors, touching or ingesting contaminated soil, or swimming in or drinking polluted water.

Release see spill.

Remediation means the removal of pollutants from soil and/or water by adsorption, excavation, pumping, biological, chemical, or other means or combination of methods.

Request-for-Assistance (RFA) sites means those sites that are handled by a Field Inspector with the assistance of a PA Hydrologist. These sites may also be subject to all or part of this guidance, as appropriate.

Risk Characterization means the final step of a risk evaluation, which combines the results of the exposure and toxicity assessments in order to quantify the potential risks to human health and the environment.

Root Zone means the depth of soil which plant roots readily penetrate and in which the predominant root activity occurs. Vegetables typically have very shallow roots, while Bermuda grass, wheat, and alfalfa often have much deeper ones. For this guidance, PA considers only the upper 2 to 3 feet of soil where most plants roots grow.

Sensitive Areas means residential areas (the yards and gardens of homes, as defined above) plus the

grounds of schools, day care centers, sports fields and playgrounds, and similar areas with potentially high soil contact uses, if they are frequently accessed by vulnerable adults or children.

- Site** means all area(s) impacted by a particular spill, or by multiple spills and leaks in a given vicinity related to a specific production or treatment facility or pipeline, and/or related historic site impacts. A site may consist of more than one impacted area.
- SNARL** means the EPA's *Suggested No Adverse Response Level*. This is the concentration of a chemical in water expected to not cause an adverse health effect. For TPH in drinking water, the SNARL includes both health effects and taste and odor.
- Spill** means the unpermitted or unauthorized surface or subsurface release, usually accidental, of substances including, but not limited to, petroleum hydrocarbons (gasoline, diesel, crude oil and/or condensate), brine, or drilling mud.
- SSTL** means *Site Specific Target Level* (as defined by the American Society for Testing and Materials), a risk-based remedial action target level for a chemical(s) of concern developed for a particular site under the Tier 2 and Tier 3 RBCA SSTL evaluations.
- Stabilization** means that the area of petroleum hydrocarbons in the soil or ground water is not expanding (is not moving, or has natural remediation equaling or exceeding the rate of plume movement so that there is no net soil or groundwater plume migration), and poses no significant risk to receptors. Most commonly used at historic and other sites where problems related to COCs have been present for years.
- TDS** means *Total Dissolved Solids*, measured as mg/l in a laboratory analytical test from a sample dried at 180 °C, or measured in the field with a conductivity meter which reads as TDS (based on a standard conversion factor).
- TPH** means *Total Petroleum Hydrocarbons*, the quantity of extractable compounds detected in a sample of soil or water as measured by a detection method (GC, infrared, gravimetric) in a solvent extract of soil or water using DEQ's method(s) or TX 1005 (see www.tnrcc.state.tx.us/permitting/analysis.htm), extended to C₃₅; EPA method 418 is not acceptable¹¹.
- TSS** means *Total Soluble Salts*, the total amount of salts, expressed as ppm (mg/kg or mg/l), dissolved in water or in soil according to laboratory testing. This is

11 TPH – DEQ's GRO and DRO analyses are often approximately summed as TPH, even though there is a potential overlap in their analytical ranges and higher carbon number compounds above C₂₈ are not included in most DRO analyses. The OK DEQ is establishing a new total TPH GC method, similar to Texas Method 1005, which will cover the current GRO plus DRO extent and more (C₆ to C₃₈±), reported by at least three distinct ranges. This will become the method accepted by the Commission, Oil and Gas Division, when it is developed.

approximately equivalent to TDS in water if the dissolved solids are salts.

Waters of the State/Waters of the US means all “streams, lakes, ponds, marshes, watercourses, waterways, wells, springs, irrigation systems, drainage systems, and all other bodies or accumulations of water, surface and underground, natural or artificial, public or private, which are contained within, flow through, or border upon this State or any portion thereof.” As defined in OWRB rules, this includes all federally defined Waters of the US within Oklahoma’s boundaries. As per the Federal Clean Water Act, impacts to the waters of the US that cannot be readily remediated must be placed into the CWA 305(b) report and/or on the CWA 303(d) list.

WHPA means *wellhead protection area*, delineated by DEQ. The WHPA must be of sufficient size, as calculated by likely groundwater travel time via an aquifer to a public drinking water supply well, to protect the well from possible harmful substances in an aquifer.

WQS means the Oklahoma *Water Quality Standards*, established pursuant to Section 303 of the CWA, which serve as goals for water quality management planning and benchmark criteria for the NPDES/OPDES permitting process. Water Quality Standards consist of beneficial use classifications for navigable waters, water quality criteria to support those uses, and an antidegradation policy statement. Oklahoma’s Water Quality Standards are found at OAC 785:45 or <http://www.state.ok.us/~owrb/rules/Rules.html>.

WQSIP means *Water Quality Standards Implementation Plan*. This document outlines how the Oil and Gas Conservation Division goes about enforcing the WQS established by the OWRB. It is available by calling the Pollution Abatement Department, or is downloadable at http://www.occ.state.ok.us/TEXT_FILES/WQSIP_05c.htm

APPENDIX VII

OPTIONAL FORMS

Company Name _____	Facility/Site Name _____
Incident Number _____	Submittal Date _____

Category or Stabilization Report

This optional form may be used to document Steps 1 and 6

Results and Path Forward Recommended by Operator/Company

Enter Category from Index Table (Attach) <input type="checkbox"/>	
Are all sample concentrations ≤ the cleanup levels for the category indicated above? (circle one) Y N (Explain at right)	

Maps Included with this Submittal

"X" if included	Description
<input type="checkbox"/>	<input type="checkbox"/> topographic map <input type="checkbox"/> area geologic map <input type="checkbox"/> USDA-NRCS soil survey map or <input type="checkbox"/> aerial photo showing site location
<input type="checkbox"/>	Sketch or map of release area with location(s) of: <input type="checkbox"/> E&P facilities <input type="checkbox"/> site features <input type="checkbox"/> buildings <input type="checkbox"/> buried utilities <input type="checkbox"/> land uses <input type="checkbox"/> drinking water wells <input type="checkbox"/> surface water bodies <input type="checkbox"/> soil sample locations and <input type="checkbox"/> monitoring wells in the vicinity of the release area
<input type="checkbox"/>	Additional maps needed/requested by PA (list):

Attachments Included with this Submittal

"X" if included	Description
<input type="checkbox"/>	Initial Site Evaluation Report (Step 1)
<input type="checkbox"/>	Index Table(s) (Step 1)
<input type="checkbox"/>	Summary of field and laboratory analytical results (Step 2)
<input type="checkbox"/>	Excavation or boring logs (Step 2, Sampling data section 2b)
<input type="checkbox"/>	Laboratory analytical reports (if requested by PA)
<input type="checkbox"/>	Representative cross section(s) showing the stratigraphy of the site and the extent of impacts based on soil boring logs (if agreed to be provided to PA).
<input type="checkbox"/>	Free product evaluation plan (if needed, Step 2, Sampling data section 3f)
<input type="checkbox"/>	Groundwater monitoring information (if needed, see Step 2, Sampling data section 3g)
<input type="checkbox"/>	Documentation of plume stabilization (if needed, see Step 6)
<input type="checkbox"/>	Documentation that all regulatory (e.g. monitoring, proper abandonment of borings and monitoring wells), consent order, and/or other agreed upon requirements are met

Company Name _____ Facility/Site Name _____

Incident Number _____ Submittal Date _____

RBCA Report
This optional form may be used to document Step 5

Results and Risk Management Approach Recommended by Operator/Company

Indicate which analysis was performed (Circle One): Tier 1 Modified Tier 1 Tier 2 Tier 3	
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Action being taken (check boxes that apply below and explain above):

- | | |
|--------------------------|---|
| <input type="checkbox"/> | Close at <input type="checkbox"/> RBCA Tier 1 RBSLs or <input type="checkbox"/> Modified RBCA Tier 1 RBSLs |
| <input type="checkbox"/> | Close at RBCA Tier 2 SSTLs |
| <input type="checkbox"/> | Close at RBCA Tier 3 SSTLs |
| <input type="checkbox"/> | Remediate to: <input type="checkbox"/> Tier 1 <input type="checkbox"/> Modified Tier 1 <input type="checkbox"/> Tier 2 <input type="checkbox"/> Tier 3
RBSLs/SSTLs levels |
| <input type="checkbox"/> | Other (e.g., plume stabilization, institutional controls, technical impracticability, etc. Itemize and explain above. Attach additional reports or justification if needed or requested by PA): |

Company Name _____	Facility/Site Name _____
Incident Number _____	Submittal Date _____

RBCA Report

This optional form may be used to document Step 5

Maps Included with this Submittal

"X" if included	Description
<input type="checkbox"/>	<input type="checkbox"/> topographic map <input type="checkbox"/> area geologic map <input type="checkbox"/> USDA-NRCS soil survey map or <input type="checkbox"/> aerial photo showing site location
<input type="checkbox"/>	Sketch or map of release area with location(s) of: <input type="checkbox"/> E&P facilities <input type="checkbox"/> site features <input type="checkbox"/> buildings <input type="checkbox"/> buried utilities <input type="checkbox"/> land uses <input type="checkbox"/> drinking water wells <input type="checkbox"/> surface water bodies <input type="checkbox"/> soil sample locations and <input type="checkbox"/> monitoring wells in the vicinity of the release area
<input type="checkbox"/>	Additional maps as necessary (list):

Attachments Included with this Submittal

"X" if included	Description
<input type="checkbox"/>	Initial Site Evaluation Report
<input type="checkbox"/>	Index Table(s) (if not previously submitted or if changed, see Step 1)
<input type="checkbox"/>	Conceptual Site Model (see Step 5): <input type="checkbox"/> Narrative <input type="checkbox"/> Graphical <input type="checkbox"/> Drawing <input type="checkbox"/> Other
<input type="checkbox"/>	Description of impacts to soil, GW and SW and site hydrogeology (including excavation or boring logs)
<input type="checkbox"/>	Summary of field and laboratory analytical results
<input type="checkbox"/>	Documentation justifying RBSLs or SSTLs: <input type="checkbox"/> Printouts of parameters used, and calculated RBSLs from OK RBCA Spreadsheet (Modified Tier 1 and Tier 2) or <input type="checkbox"/> Other documentation
<input type="checkbox"/>	Laboratory analytical reports (if requested by PA)
<input type="checkbox"/>	Representative cross-section(s) showing the stratigraphy of the site and the extent of impacts based on soil boring logs (if agreed to be provided to PA)
<input type="checkbox"/>	Free product evaluation (if needed, similar to Step 2 Sampling data section 3f)
<input type="checkbox"/>	Groundwater monitoring information (if needed, similar to Step 2 Sampling data section 3g)
<input type="checkbox"/>	Documentation of plume stabilization (if needed, similar to Step 6)
<input type="checkbox"/>	Remediation plan (if needed or requested by PA)
<input type="checkbox"/>	Post-action monitoring plan (if needed)
<input type="checkbox"/>	Documentation of proper abandonment of boring and monitoring wells (see Step 2, Sampling data sections 5e & 6h) per OWRB rules

