



Environmental Services, Inc.

UST Compliance Sampling with Attorney-Client Privilege

Key Project Features:

- Old v. New Contamination Evaluation
- Vertical Delineation under Piping
- Negotiated Reduced Sample Analyses
- Disposal Assistance to Control Costs
- Workplan Done on First Day

For this tank replacement project in the San Francisco South Bay, Pangea performed all compliance sampling with the two local oversight agencies. With the former owner responsible for remediation of a prior release, special oversight and sampling was conducted to carefully and cost-effectively differentiate old and potentially new contamination. Due to initial concentrations detected under the piping and dispensers, Pangea sampled deeper soil under attorney-client privilege; the sampling results suggested that the shallow impact was limited to the first few inches of native clayey soil. This additional assessment helped avoid costly borings in the future, and, more importantly, helped the current owner avoid responsibility for site assessment and remediation at his property where costly remediation was under way.



To further control costs, Pangea worked very closely

with the agency inspectors. Pangea successfully avoided overexcavation of detected contamination and negotiated standard sample turnaround instead of costly 24-hour 'rush' analyses. Pangea also minimized sample analysis for fuel oxygenates by EPA Method 8260, relying on initial MTBE and hydrocarbon results by EPA Method 8015/8021. To reduce soil disposal costs, Pangea pursued soil/pea gravel reuse with the contractor and regulator, and characterized stockpile soil for offsite disposal at different rates depending on concentrations levels.

Pangea was very responsive throughout the project, understanding that fast turnaround and meeting the contractor's schedule minimizes station downtime. On the very first day of the project Pangea attended a site meeting and prepared a workplan the same day, keeping the UST removal/replacement project on schedule.

To best control your overall costs and address your needs, Pangea recommends using an experienced consultant from project beginning to end. Your consultant can save you time and money, and minimize your environmental liability by working carefully with your contractor and regulator.

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