

**NOTES FROM THE TELEPHONE CONFERENCE CALL
SEPARATE PHASE LIQUIDS (SPL) ISSUE
Applicability and Attainment Subcommittee of the
Cleanup Standards Scientific Advisory Board
July 2, 2004
Rachel Carson State Office Building
14th Floor Conference Room
400 Market Street
Harrisburg, PA**

9:00 a.m., Friday, July 2, 2004

**Participants: Betsy Shamberger
Colleen Costello
Cullen Flanders
Derek Tomlinson
Caryn Barnes
Larry Roach
Mark Mummert
Samuel Fang**

- 1 The first item on the agenda was development of objectives for the assignment. Several participants discussed the current status of the industry concerning remediation of separate phase liquids (SPL). ASTM, RTDF, the state of TX and others are in the midst of developing or just about to issue new guidance on this issue. One person expressed a need for there to be a clear guidance concerning how to set “a number” that could be used to get closure in the Act 2 process.
- 2 Current procedures for dealing with SPL were discussed. For SPL from a regulated tank, there are specific steps that must be followed in the Storage Tank program. It was noted that the Tank regulations specify SPL removal until there is less than 2 gallons recovered per month and less than 0.01 foot in all wells. The Tank Regulations also allow closure when two years of monitoring show less than 0.1 foot in all wells. Conversely, at Act 2 sites where SPL is present but did not come from a regulated tank, a risk based approach could be used to set remediation goals for the SPL.
- 3 The committee discussed ways to define the extent of SPL that could practically be removed. The age and method of the release as well as the setting where the release occurred affect how “extent practical” is defined. It was agreed that it would be helpful to have a procedure that could be followed to evaluate these variables and arrive at final numbers that would apply to each site. To avoid having each SPL site become a site-specific type of

remediation, it was agreed that it would be good to define a few categories that are typical and the conditions under which they apply. For example, there could be 3 categories as follows:

- High risk sites: residential properties and regulated storage tank releases
(for these the current numbers from the tank program would apply)
- Medium risk site: to be defined
(for these less removal would be required)
- Low risk sites to be defined.
(for these no removal may be required)

4 The committee proposed that the objective for this assignment should be to define screening procedures and clean-up objectives that would apply to the 3 or 4 categories of SPL sites as outlined above.

5 The committee discussed problems and considerations in site assessment and practical removal of SPL. These included correcting well measurements for porosity and particle size. A concern was expressed that current methods over estimate the potential recovery volume and also over estimate SPL mobility.

6 The telephone call was brought to a close and ~~no~~several assignments were made:

-- Derek Tomlinson is going to distribute documents from API. Cullen Flanders is going to distribute document from ASTM. Colleen Costello is going to distribute document from Texas.

-- Sam Fang is going to gather information from DEP regional offices regarding the experience on the percentage of SPL recovery at real sites. The percentage of SPL recovery is calculated from the estimated volume of SPL in the subsurface at the time the contamination was discovered and the actual SPL volume that has been recovered.

7 ~~at this time because of the need to discuss the proposed objective with the department. Also, no follow-up meeting was scheduled at this time.~~