

**Operation Title:** 

SOP No. RWM-PP-006-Effective Date: 9/15/2021 Revision No. 01 Last Revision Date: 12/01/2020

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# COVER SHEET STANDARD OPERATING PROCEDURE

**Conceptual Site Model for Petroleum Contamination** 

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#### 1. APPLICABILITY

This Standard Operating Procedure (SOP) applies to all BRWM staff working on petroleum remediation sites within the Petroleum Program. It is also applicable to all parties that investigate, mitigate, or remediate petroleum releases.

This SOP is not a rule and is not intended to have the force of law, nor does it create or affect any legal rights of any individual, all of which are determined by applicable statutes and law. This SOP does not supersede statutes or rules.

#### 2. PURPOSE

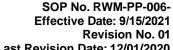
The purpose of this document is to describe the MEDEP procedure for developing and documenting a conceptual site model (CSM) at petroleum release sites.

#### 3. RESPONSIBILITIES

All MEDEP BRWM Staff must follow this procedure when establishing a CSM at a petroleum remediation site. All Managers and Supervisors are responsible for ensuring that their staff are familiar with and adhere to this procedure. MEDEPBRWM staff reviewing data by outside parties are responsible for assuring that the procedure (or an equivalent) was utilized appropriately to develop a risk-based remedial action.

#### 4. **DEFINITIONS**

- 4.1 CONCEPTUAL SITE MODEL (CSM) A written or pictorial representation of an environmental system, the extent of the contaminant source, and the biological, physical and chemical processes that determine the transport of contaminants from sources through environmental media to environmental receptors within the system. (ASTM E1689 95 (2014), Standard Guide for Developing Conceptual Site Models for Contaminated Sites)
- 4.2 CONTAMINANT OF CONCERN (COC) A contaminant that has been released at a site and risk evaluation indicates that mitigation or remediation is necessary to prevent exposure to the contaminant.
- 4.3 ENVIRONMENTAL PROFESSIONAL A person meeting the educational, training, and experience requirements as set forth in 40 CFR Section 312.10(b). 40 CFR Section 312.10(b) includes (1) a person who possess sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases on, at, in, or to a property, sufficient to meet the objectives and performance factors in Section 312.20(e) and (f). (2) Such a person must: (i) hold a current Professional Engineer's or Professional Geologist's license or registration from a state, tribe, or US territory and have the equivalent of three (3) years of full-



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time relevant experience; or (ii) be licensed or certified by the federal government, a state, tribe, or U.S. territory to perform environmental inquiries and have the equivalent of three (3) years of full-time relevant experience; or (iii) have a Baccalaureate or higher degree from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five (5) years of full-time relevant experience; or (iv) have the equivalent of ten (10) years of full-time relevant experience. (3) An EP should remain current in his or her field through participation in continuing education or other activities.

- 4.4 PETROLEUM REMEDIATION SITE Any petroleum site in Maine where a risk-based remedial action is currently on-going, in the planning stages of remediation, being evaluated to determine if remedial action is needed, being monitored after remedial actions are complete, or an evaluation has been completed and remediation is warranted based on the CSM. Once a site has been closed it is no longer considered a petroleum remediation site unless it is reopened or a new release occurs.
- 4.5 PROJECT TEAM The project team includes DEP staff within BRWM that are simultaneously assigned and actively involved in a petroleum release case that requires remediation of soil, water, or air. The project team may include members of the Division of Response Services, Division of Technical Services, Division of Petroleum Management, and the Division of Remediation. Additionally, the team may include environmental consulting technical staff hired by the MEDEP or a responsible party
- 4.6 RECEPTOR An entity or resource that may be at risk of impact from petroleum contamination. Receptors could include humans, ecological systems, and surface water resources.
- 4.7 RISK BASED REMEDIAL ACTION A remedial action that is based on the risks to human health and the environment based on site data as evaluated in accordance with the Remedial Action Guidelines Petroleum Addendum. It does not include remedial actions based on site-specific license requirements or statutes that require specific target cleanup levels.

#### 5. GUIDELINES AND PROCEDURES

#### 5.1 INTRODUCTION

For every petroleum remediation project, the project team will need to develop a CSM. The CSM is a dynamic tool that directs the project team's investigation and risk mitigation decisions at the site. The CSM should be developed as early in the assessment process as possible (it does not require site specific hydrogeologic or laboratory data) and updated as new information becomes available. The CSM will be used to focus site investigation work plans on the collection of data needed to support a site-specific, risk-based decision in accordance with the



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Remedial Action Guidelines Addendum for Petroleum Remediation. The CSM should be revised as data is obtained to reassess appropriate risk mitigation and site remediation options.

Section 6.3 of the Remedial Action Guidelines (RAGs) provide an explanation of a CSM based on ASTM E1689-95 (2014). Readers should refer to the RAGs for definitions and references.

There are three basic components of a CSM including:

- 1. The source of the contamination,
- 2. The receptor(s), and
- 3. The migration pathway between the source to the receptor.

A CSM must include all three components of the CSM.

#### 5.2 PLANNING

Planning a CSM may be completed without a site visit based on verbal communications and available information on the site setting. However, a site visit is necessary to develop a site-specific CSM. Many petroleum release sites involve a recent discharge of petroleum. Prompt emergency response actions to eliminate the discharge condition and control the released petroleum from migrating to a receptor, into the environment, or soaking further into building materials is the top priority for emergency response action. Development of a CSM must not delay the emergency response action. The information obtained during the emergency response action forms the basis of the initial CSM. Therefore, it is vital for the Project Team to obtain the emergency response information during the planning stage of the CSM.

#### **5.3 PROCEDURE**

#### 5.3.1 OVERVIEW

In addition to the information obtained from the emergency response actions, the CSM should incorporate the surficial and subsurface hydrogeology, that could affect the migration of petroleum contamination to a receptor. The CSM should identify the extent of the source, the COC(s), the migration pathways, and the receptors. Historic site uses and uses of neighboring properties should be considered and incorporated into the CSM as appropriate.

#### 5.3.2 PROJECT SPECIFIC CONSIDERATIONS

Considerations specific to a petroleum CSM include, but are not limited to, the following:

- 1. The product type, volume, duration, and date of the release
- 2. Site history
- 3. Remaining impacts to environmental media following emergency remediation



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- 4. Site stratigraphy and geology (surficial and bedrock)
- 5. Depth to groundwater
- 6. The location of the release relative to water supplies, ground water resources, and surface water resources
- 7. Impact or risk of impact to indoor air quality consider heating, ventilation, and air conditioning (HVAC) system
- 8. The location of the release relative to structures on the site inside or outside of the building
- 9. Impacts to preferential pathways such as sumps, floor drains, perimeter drains, etc.
- 10. Types and characteristics of at-risk water supplies casing condition and depth, well depth, etc.
- 11. Impacted building components construction of building and foundation type
- 12. Site topography
- 13. Groundwater geochemistry changes and non-petroleum vapor impacts caused by the petroleum release

Attachment 1 of this SOP provides a summary of important information used to develop a site-specific CSM. The attachment includes two options for summarizing the information including a field-form with space to hand-write the details and an electronic form utilizing a fill-in form with drop-down options. BRWM staff and/or an environmental professional investigating and monitoring a site, will update the CSM as appropriate to reflect the current understanding of the site. The CSM will include site maps, sample location maps, photographs, and site drawings/sketches to relay important details of the CSM. Any CSM on which remedial actions are based will be documented in the Petroleum Program project files or as a written submittal to the department. For sites with ongoing monitoring, the sample location map will include sample point names used in the Sampling and Analysis Plan (RWM-PP-007).

#### 6. QUALITY ASSURANCE/QUALITY CONTROL

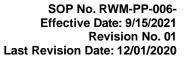
Data quality objectives (DQOs) should be stated in the Sampling and Analysis Plan (RWM-PP-007e). Quality Assurance/Quality Control (QA/QC) samples may be collected if needed to meet DQOs. All analytical data should be reviewed and assessed to determine if DQOs have been met. If review indicates DQOs have not been met, corrective action will be recommended by the reviewer.

To ensure complete and accurate representation of the site, all project team members should review the CSM.

#### 7. REFERENCES

7.1 ASTM E1689 - 95 (2014), Standard Guide for Developing Conceptual Site Models for Contaminated Sites

7.2 SOP RWM-PP-007 Sampling and Analysis Plan





Attachment 1

**CSM Forms** 

Spill #: Conceptual Site Model - Petroleum Discharge						
Site Address						
Source Location   Other Spill Paths   Outside   Inside   Location:   Outlet:   Outle						
Narrative (source, cause product, volume)    Source Location						
Narrative (source, cause product, volume)    Source Location						
Narrative (source, cause product, volume)    Source Location						
Outside						
Location:   Outlet:						
Outlet:						
discovery date: duration:   SITE GEOLOGY						
SITE GEOLOGY Overburden Type/Stratigraphy Depth to Bedrock Bedrock Type Groundwater Gradient Yes No  IMPACTED AND AT RISK MEDIA/RECEPTORS  Groundwater Soil Surface Water/Other  Describe Impacts/Risk: Describe Impacts/Risk: Describe Impacts/Risk:  Air / Vapor  PID at source: Slab / Floor Condition: Impacted soil/FP under building: PID in living space: Resident's Impression: Sensitive Pop.:						
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Groundwater  Describe Impacts/Risk:  Describe Impacts/Risk:  Describe Impacts/Risk:  Air / Vapor  PID at source:  PID in living space:  Resident's Impression:  Soil  Surface Water/Other  Describe Impacts/Risk:  Describe Impacts/Risk:  Impacted soil/FP under building:  Sensitive Pop.:						
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PID at source:       Slab / Floor Condition:       Impacted soil/FP under building:         PID in living space:       Resident's Impression:       Sensitive Pop.:						
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PID other: HVAC/SSDS:						
Wells						
Casing Depth to						
Well name Well Type Depth Length GW Driller Yield Install Date Filtration Impacted? Comments						
On Site						
Other Char						
Other Other Other						
RESULTS OF EMERGENCY RESPONSE ACTION						
RESULTS OF EMERGENCY RESPONSE ACTION  Remedial actions taken Field Screeing Results Lab Sample Results Impacted Soil Remaining Recoverable Free Product						
Remedial actions taken Field Screeing Results Lab Sample Results Impacted Soil Remaining Recoverable Free Product Excav. Bottom:						
Remedial actions taken  Field Screeing Results  Lab Sample Results  Impacted Soil Remaining  Yes  No  No						
Remedial actions taken Field Screeing Results Lab Sample Results Impacted Soil Remaining Recoverable Free Product Excav. Bottom:						

Date:\_\_\_\_\_

## **Maine DEP Petroleum Discharge CSM**

Date: Spill Number: Property Owner Name: Property Owner Phone: Property Owner Phone: Property Owner Email: Duration of Release: Volume Released: Volume Released: Property Owner Email: Duration of Release: Volume Released: Owner: Volume Released: Owner: Owner Email: Duration of Release: Volume Released: Owner:	-		·	
Product: Other Source: UST Cause: Location: Dirt Floor  Response/Referral Notes:    Impacted	Date:	Spill Number:	Property Owner Name:	
Product: Other Discovery Date: Volume Released: Source: UST Cause: Location: Dirt Floor  Response/Referral Notes:  Soil On Site:	Site Address:		· ,	
Product: Other Source: UST Cause:  Location: Dirt Floor  Response/Referral Notes:    Impacted			· ·	
Source: UST Location: Dirt Floor  Response/Referral Notes:    Impacted			Duration of Release:	
Response/Referral Notes:    Impacted		Discovery Date:	Volume Released:	
Response/Referral Notes:    Impacted	Source: UST	Cause:	Ma.	
Impacted At Risk Soil On Site:  Soil On Site:  Soil Off Site:  Groundwater:  Surface Water:  Public Drinking Water Supply:  Well Name:  Well Type: Dug  Depth:  Casing Length:  Depth to GW:  Overburden Type and Stratigraphy:  Bedrock Type and Depth:  Groundwater Gradient:  Impacted Source:  PID at Source:  PID in Living Space:  PID other:  Slab / Floor Condition:  Resident's Impression:  Impacted Items: Impacted Soil/FP under building: Sensitive Pop: HVACC/SSDS sys:  Other Notes:  Other Notes:	Location: Dirt Floor	MILITU	V/V.	
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Sand and Gravel Aquifer:	7,4			
	Groundwater Gradient:			
	Sand and Gravel Aguifer:			
Sumps: Drainage System: Utilities:	Sumps:	Drainage :	System: Utilities:	
Other Preferential Pathways:				
Previous Spills at Site: Previous Spills Near Site:	·			

## **Maine DEP Petroleum Discharge CSM**

D - 1 -	Coill Number			
Date:	Spili Number:	Spill Number: Property Owner Name:		
Site Address:		Property Owner Phone:		
		Property Owner Email:		
		Duration of Release:		
Product: Other	Discovery Date:	Volume Released:		
Source: UST	Cause:	Mar.		
Location: Dirt Floor	<u> </u>	N/V.c.		
Response/Referral Notes:	S. F.II.			
		1/1		
		6		
	Impacted At Risk	PID at Source:		
Soil On Site:		PID in Living Space:		
Soil Off Site:		PID Other:		
Groundwater:		Slab / Floor Condition:		
	^ <del>-</del>	Resident's Impression:		
Surface Water:	님 님	Impacted Items:		
Public Drinking Water Supply:		Impacted Fixed Components:		
		Impacted soil/FP under building:		
Well Name: Wel	ll Type: Dug	Sensitive Pop:		
		HVACC/SSDS sys:		
Depth:		•		
Casing Length:		Other Notes:		
Depth to GW:	0'>-	312.		
Overburden Type and Stratigraphy:		THE THE PARTY OF T		
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Bedrock Type and Depth:	- 01			
Groundwater Gradient:				
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Sand and Gravel Aquifer:				
Sumps:	Drainage	System: Utilities:		
Other Preferential Pathways:				
Previous Spills at Site:	Previous Spills Near Site:			

## RWM-PP-006\_ConceptualSiteModel

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