

Petroleum Cleanup Program

REMEDIAL ACTION PLAN GUIDELINES

BUREAU OF PETROLEUM STORAGE SYSTEMS

History: New 9/10/93, Revised 5/1/98

Identification No.: BPSS-6

Topic of Guideline: Modifications to Approved RAPs

Signature and Date
PE ADMINISTRATOR

Signature and Date
BUREAU CHIEF

Once the Remedial Action Plan (RAP) is approved, it may be necessary to modify the design, either before or after the system is installed. The following types of changes require prior approval by the Department (or contracted local cleanup program) of a RAP Modification prior to implementation:

1. Any change in the design flow rate or other operating parameters for unit process equipment or the types of unit processes.
2. Any change in the number of recovery wells, vacuum extraction wells, or in situ sparging wells.
3. Any change in the method of treated effluent disposal.
4. Any change in the location of hydraulic recovery or disposal systems which is substantial enough to have a significant effect on the site hydraulic conditions. Example: If the proposed location of an infiltration gallery is changed from upgradient to downgradient of the contaminant plume, a RAP modification is required. If the proposed infiltration gallery location remains upgradient in the same approximate location and is the same design dimensions but is relocated slightly and reoriented to accommodate site construction constraints, prior approval of the change is not necessary. This should be shown in the as-built plans, however (see BPSS-5).
5. Any change to replace existing equipment processes with new equipment that has different design and operational characteristics.

6. A change to the method of air emissions treatment on a vacuum extraction system.
7. Proposals to change the number, locations, or frequency of samples taken during remediation to monitor cleanup progress or compliance with discharge criteria.

Modifications which could be considered a complete redesign of the approved RAP may require a new RAP Approval Order. For sites eligible for participation in the Department's petroleum cleanup preapproval program, a RAP modification proposal which recommends the complete redesign of an approved but not implemented RAP must include the engineering redesign cost in the cost justification for the RAP Modification. The cost for preparing a new RAP due to a change in the designated consultant/contractor may not be allowable for program funding.

Any changes which are less significant than those described above may be implemented without prior approval but the changes from the approved RAP must be shown on the system as-built plans. If there is any question of whether a RAP Modification is necessary, contact should be made with the Bureau of Petroleum Storage Systems or appropriate local cleanup program office.

TC/tc