

Use of the Short List of Regulated Substances for Releases of Petroleum Products

Petroleum products contain a large number of regulated substances. However, recognizing that it is not practical to examine all of these regulated substances, the Department has developed what is referred to as the "short list" of regulated substances for groups of petroleum products. This "short list" appears on the page that follows. It is only these regulated substances or "chemicals of concern" that need to be tested for to demonstrate attainment under any of the Act 2 standards, when there is a release of these petroleum products, uncontaminated by other sources.

Further, in demonstrating attainment of the Statewide health standard, the following two (2) conditions must also be met:

1. For attainment in soil media, there must be no free liquids left in the soil based on visual observation, and the soil must not create any odor nuisance. With regards to the odor nuisance, the soil, by virtue of the location and level of odor, must not result in a complaint to the Department concerning petroleum odors which can, upon investigation, be attributed to petroleum contamination remaining in the soil.
2. For attainment in groundwater media, there must be no free floating product¹ at the point of compliance (property line).

The rationale for application of these conditions is that the Statewide health standards are capped at saturation and solubility in soil and groundwater, respectively. Since the Department is only requiring an attainment demonstration for the "short list" of regulated substances and not for all regulated substances contained in a particular petroleum product, these conditions provide further assurance that all Statewide health standards applicable to the petroleum product are met.

¹ U. S. EPA. How To Effectively Recover Free Product At Leaking Underground Storage Tank Sites: A Guide For State Regulators. EPA 510-R-96-001. September 1996.

Use of the Short list of petroleum products

Petroleum products contain a large number of regulated substances, however the Department will accept analysis and attainment demonstration of a "short list" of substances (listed on the following pages) for a particular petroleum product under the following conditions:

1. ~~Use of the short list is limited to remediations resulting from releases of the listed petroleum products that are uncontaminated by other sources.~~
2. ~~For soil media attainment, there must be no free liquids left in the soil based on visual inspection, and the soil should not create any odor nuisance.~~
3. ~~For groundwater media attainment, there must be no measurable free floating product (0.01 ft [EPA]) at the point of compliance (property line).~~

Reference:

~~U.S. EPA. How to Effectively Recover Free Product at Leaking Underground Storage Tank Site, A Guide for State Regulators. EPA 510-R-96-001. September 1996.~~