

Ohio Department of Commerce

Division of State Fire Marshal
Bureau of Underground Storage Tank Regulations
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Governor

Donna Owens
Director

June 7, 1996

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BJAAM
ENVIRONMENTAL, INC.

Mr. Brett Urian
BJAAM Environmental, Inc.
455 Beverly Avenue
P.O. Box 523
Canal Fulton, Ohio 44614

RE: BUSTR Risk Assessments in Ohio

Dear Mr. ~~Urian~~ *Brett*,

I thank you for your letter dated April 30, 1996, regarding "Remedial Cost Savings thru BUSTR Risk Assessments". Your insight concerning the use of risk assessment as a cost saving tool concerning underground storage tanks (UST) sites is appreciated. In addition, your overall cost saving analysis on eleven BUSTR risk assessment sites comparing risk assessment to pro-active remediation was very interesting. BUSTR is well aware that risk assessment may be a valuable tool that can lower remediation costs and still be protective of human health and the environment.

You made a statement that a "common complaint from the few consultants currently performing risk assessments is that they cannot get their risk assessments (RA) reviewed" by BUSTR. Raymond Roe, Bureau Chief of BUSTR, checked with his corrective action staff and he indicated to me that they were not receiving complaints from other consultants that their RAs were not being reviewed. Chief Roe did indicate that BUSTR has recently lost some of its corrective action staff experienced in reviewing risk assessment reports. This has slowed down the review of risk assessments by BUSTR but has not stopped the process. BUSTR has since filled those vacant corrective actions staff positions and is currently in the process of training the new staff.

Please take note that since BUSTR has limited staff to oversee the many corrective action sites in Ohio, BUSTR must prioritize its reviews of these sites. The UST sites that pose the greatest threat to human health and the environment are the sites that the BUSTR corrective action staff handle first. Very few of these "high priority" sites have had RAs performed and RA reports sent to BUSTR. Of these few "high priority" RAs, BUSTR has or is currently reviewing them along with lower priority RA reports.

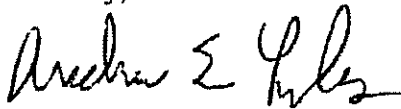
BUSTR does foresee an increased number of UST owners and operators using risk-based analysis and management at their UST sites. Presently, UST owners and operators may use BUSTR's Site Feature Scoring System (SFSS) and Risk Assessment Guidance Document (RAGD) in determining if corrective actions are required at an UST site. In addition, BUSTR is working with US EPA, Region 5 and the petroleum industry in the use of risk-based corrective actions (RBCA) at UST sites. As you are aware, RBCA is similar to the risk assessment process. The use of the SFSS, RAGD, and eventually RBCA gives UST owners and operators greater flexibility than ever in managing clean ups at their UST sites. So I can assure you that BUSTR is preparing to review an increasing number of reports that involve risk base analysis of UST sites.

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As you stated in your letter, risk assessments are "complex studies" in which most geologists and environmental engineers are not generally trained to conduct. Because conducting and reviewing risk assessments can be a complex and time consuming process, however, it will take time for environmental consultants, tank owners, the UST owner community, and BUSTR to develop a good working use and knowledge of risk assessment and the risk-based process.

I want to thank you for your willingness to help BUSTR promote and further develop the risk assessment process for sites in Ohio.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrew E. Lyles".

Andrew E. Lyles
Assistant Director 4
Department of Commerce