



February 14, 2024

Rich Reinhard
United Fueling
PO Box 5609
Salem, OR 97304-0609

Dear Rich Reinhard:

You recently reported an underground storage tank release or indicated interest in our independent or voluntary cleanup program. This letter has a few tips on how to do a streamlined and efficient cleanup.

Cleanups that go well typically have a knowledgeable consultant with experience working with DEQ's cleanup program. This is because one of the biggest costs in any cleanup will be the costs for the time of the consultant (often in the range of \$75 to \$200 per hour), as well as the cost for DEQ oversight (typically about \$150 to \$200 per hour).

A consultant with experience often knows how to minimize the amount of DEQ oversight necessary on a cleanup project. He or she should have a good understanding of what DEQ project managers will expect and should:

- Be able to generate a sampling and analysis plan with little oversight
- Know how to draft a work plan that will require little revision
- Be able to formulate a conceptual site model
- Know what lab methods are appropriate for a particular contaminant
- Be able to write clearly and submit reports to DEQ that are well organized
- Be familiar with hazardous waste and cleanup and leaking tank cleanup rules
- Have access to a team of technical professionals, including registered engineers and geologists
- Be able to come up with innovative solutions that stay within Oregon's cleanup rules
- Be able to work collaboratively with DEQ project managers.

When these skills are absent, it results in DEQ's project manager taking more time to lead an inexperienced consultant through the process. A good consultant will know what is required for an adequate site investigation and cleanup and often will have a work plan for a similar site that can be used as a template rather than making it up from scratch.

This is a scenario DEQ's Cleanup Program sees too often:

An inexperienced consultant with few resources available assures his prospective client that he can handle the cleanup site and charge a billing rate that is far below those of major competitors. He or she then submits to DEQ a work plan that is missing major elements:

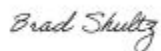
- It proposes to do the cleanup before investigating the site and determining if a cleanup is necessary
- It has a map that is unreadable or is so lacking in detail that it's unusable
- It proposes an inappropriate lab method
- It shows a misunderstanding of the contaminants
- It does not present the existing information about the site in a clear way
- It shows a misunderstanding of the cleanup goals.

These are all things that might take several drafts and several phone calls and/or emails to get right. Each draft could take hours to write and takes time to review. At a total cost of \$225 to \$400 per hour for both consultant and DEQ oversight, these costs can mount quickly.

I strongly encourage you to talk with several prospective consultants and phone their references. It's also a good idea to ask for a written proposal from the consultants you are interviewing. DEQ does not recommend specific consultants. If you are looking for a list of consultants, we encourage you to check with the Northwest Environmental Business Council (NEBC). They post a list of members, and you can find them on the web at <https://www.nebc.org/>. DEQ feels that most of the consultants listed on the NEBC website are well qualified to work on cleanup projects in Oregon.

Thank you for your interest in DEQ's cleanup program. If you have any questions, please call me at (541) 214-0101.

Sincerely,



Brad Shultz
Western Region Environmental Cleanup Interim Manager

ec: ORMS LUST27-24-0051

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