

**CHAPTER 15 PROGRAM NOTE #8:
MANAGEMENT OF PETROLEUM
CONTAMINATED SOILS**

November 18, 1993

The soil remediation industry is rapidly developing and expanding. As treatment technologies emerge and are evaluated in the field for management of petroleum contaminated soils, it is important to remember that storage (both pre-treatment and post-treatment), treatment on land, and disposal of materials are waste discharges to land and should be regulated according to the requirements in Chapter 15. As with other waste discharges, petroleum contaminated soil must be evaluated for threat it poses to water quality, and classified according to that threat. In most cases, petroleum contaminated soils are managed as designated waste. Whatever the waste, any Waste Management Unit (**WMU**) used for its treatment, storage, or disposal must be designed, constructed, operated, and maintained to achieve compliance with the applicable Chapter 15 requirements.

Several components of a soil treatment operation are likely to be subject to Chapter 15, including: **(a)** any stockpiles used for pre-treatment storage of contaminated soils, **(b)** the pile or spreading area where treatment is carried out, and **(c)** depending upon the effectiveness of treatment, any post-treatment stockpiles. Note that all of these areas are "waste piles" under Chapter 15. [Only a unit at which wastes are intentionally incorporated into soil so that they will be degraded or immobilized within a specified treatment zone is a "land treatment unit".]

Where a permanent WMU is not proposed, appropriate Chapter 15 requirements should be applied to protect water quality. For expediency, some Regional Water Boards regulate these types of operations by General WDRs or General Waivers, so long as the operation meets specified conditions. Nevertheless, constituents in the contaminated soil **must not** be able to migrate off-site

and create an unacceptable threat to water quality. Likewise, the operation must preclude gas- or liquid-phase contaminants from migrating into soils underlying the treatment, storage, or disposal areas.

This is intended as general guidance to help maintain consistency among and within regions. If you have any questions, please telephone Peter Fuller, Division of Clean Water Programs at (916) 227B4391, CALNET 498B4391.