

Sampling & Analyses for EPH

Claim Submission Guidance Document

Task Code 27.4.27

Extractable Petroleum Hydrocarbon Laboratory Analyses (To replace Section 4.27, page 43 of the Workbook)

To be reimbursable, costs must be related to eligible Petroleum Products that include gasoline and diesel fuel. Eligible Petroleum Products, however, do not include many other types of petroleum products typically found at dispensing facilities, such as heating oil, lubricating oil, and waste oil. When conducting site characterization or response actions, it is important to note that the 21J program will only reimburse costs that are directly related to the eligible Release, and not necessarily all costs required to meet the requirements of the MCP.

When conducting an investigation or response action at a site with spilled gasoline and/or diesel products, the costs associated with EPH sampling and analyses will be reimbursable in the following cases:

1. Eligible Diesel Fuel Release:

- a. Costs associated with EPH analyses are reimbursable for samples collected during site characterization, response actions, and for ongoing site monitoring activities conducted in response to an eligible release of diesel fuel.

2. Eligible Gasoline Release:

Costs for EPH analysis will be eligible for reimbursement under any of the following scenarios:

- a. Facility with known current or historical diesel fuel storage: Costs associated with EPH analyses are reimbursable for the first round of site characterization samples collected as follows:
 - i. if the initial EPH analytical results indicate reportable concentrations of diesel-range petroleum hydrocarbons, then future costs associated with EPH analyses will be reimbursable if the source is an eligible Petroleum Product.
- b. Facility with no recorded history of storing diesel fuel or diesel releases: Since historical UST records are not always accurate or complete, the costs associated with EPH analyses are reimbursable for initial sampling. If reportable concentrations of diesel-range petroleum hydrocarbons are detected and the source is not identified, then the costs for future or additional EPH analyses will not be reimbursable until the source of the release is identified and determined to be eligible.
- c. Facility has a MCP Groundwater Category of GW-1: There may be constituents of gasoline that are not target analytes in the VPH analysis, but can be detected using the EPH analytical method (e.g. 2-methylnaphthalene). Some of these analytes may become an important contaminant of concern and risk driver when evaluating human health risks associated with the Release. For facilities where groundwater is classified as GW-1, EPH and/or EPA Method 8270 SIM analyses will be reimbursable.

As noted above, EPH analyses may be required to assess other releases or sources such as historic heating oil or waste oil that are not eligible for reimbursement under M.G.L. c.21J. You are strongly encouraged to review 503 CMR 2.00 to become familiar with the eligibility requirements for reimbursable costs.