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GUIDANCE FOR SPILL BUCKET ASSESSMENT (CREATED MARCH 3, 2021)

A failed spill bucket test is a failed system test and requires reporting a confirmed release (Section 4-3(a)) to the Technical Assistance Hotline at (303) 318-8547 within 24 hours of the failed test.

Facility owners/operators are required to either repair or replace a cracked spill bucket and appropriately assess whether it has caused impacts of regulated substance to the environment. Use the steps identified below to assess for a release from a spill bucket when A) it is being replaced or B) it is being repaired.

(A) This screening method can ONLY be used in cases when the spill bucket is going to be fully replaced and a full observation can be made underneath the spill bucket.

Tank backfill material should be visually inspected and field-screened with a photoionization detector (PID) during the spill bucket replacement. If there are indications of a release, please refer to section B. If there are no indications of a release (i.e., visual inspection and field screening do not identify a release), then no additional assessment is required, and the observations should be reported to OPS in the Site Characterization Report (SCR). Observations should be documented in the form of photographs of the fill material, PID readings that were recorded during the spill bucket replacement activities, and anything else that will further document that a release to the environment did not occur. If proper documentation CANNOT be provided, then a full spill bucket assessment must be performed (see section B). The Minor Equipment Repair/Replacement Notification form and Tightness Testing for Secondary Containment form are required within 30 days of completing the repair or replacement.

(B) This section describes the full spill bucket assessment method and must be performed when a spill bucket is being repaired, if documentation cannot be provided that a release did NOT occur to the environment (see section A), or if visual observations and/or PID readings indicate that backfill material has been impacted by petroleum products.

To perform a full spill bucket assessment, native soil and groundwater samples must be advanced at a reasonable but safe location in all four directions around the tank basin to an appropriate depth (minimum 25 feet) to assess for the presence of a release. Groundwater samples for COCs are required if groundwater is encountered. Groundwater samples may not need to be collected if the depth to groundwater is unknown and if you can demonstrate that the vertical extent of contamination has been defined prior to encountering groundwater. When advancing borings around the tank basin, the depth of the tank basin, the porous nature of backfill material, and the surrounding lithology must be considered when determining depth of the boring. The Minor Equipment Repair/Replacement Notification form and Tightness Testing for Secondary Containment form are required within 30 days of completing the repair or replacement.

If you have questions about this information, please call the OPS Technical Assistance Hotline at (303) 318-8547.