



Low-Threat UST Closure Policy

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Board Agenda Item 8

The UST Policy Working Group

Group Members and Affiliation*

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*While members provided the perspectives and priorities of their respective stakeholder groups during this work, the opinions stated by group members and the recommendations of this draft policy are those of the participants and not necessarily their affiliated entities.



Policy Objectives

- Implement a recommendation of the UST Cleanup Program Task Force (2010)
- Provide clear direction for the numerous independent regulatory agencies
- Deliver a tool to enhance consistency, predictability and efficiency of the UST regulatory decision-making process
- Encourage responsible and expedient site cleanup to better protect state's water resources
- Direct scarce resources (USTCF and RP resources) to releases that pose a real threat to human health and the environment
- Close cases that don't present a real threat to human health and the environment



Policy Highlights

- Based on existing statutes, regulations and resolutions
- Draws on current scientific understanding
- Provides technical justifications for policy recommendations
- Requires the removal of source-area contamination
- Acknowledges natural attenuation while protecting public health and safety
- Utilizes risk assessment methodology for residual contamination management
- Addresses the most common exposure to UST releases:
 - Physical contact
 - Consumption of groundwater
 - Vapor intrusion

UST Case Evaluation Screening Process to Identify Low Threat Cases

Active UST Case



Level 1 Evaluation - Fundamental Criteria

1. Release is petroleum
2. Release has been stopped.
3. Site is located in an area served by a public water supply.



Level 2 Evaluation - Comprehensive site understanding = Conceptual Site Model



Level 3 Evaluation - Secondary Source Has Been Removed to Extent Practicable



Level 4 Evaluation - Media-Specific Analysis

1. Groundwater (plume length and concentration-based)
2. Direct contact (concentration-based)
3. Soil vapor - concentration and depth)



Satisfaction of Evaluative Criteria - Low Threat Case



Thank-You's

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- Vicky Whitney, Deputy Director for Water Quality
- Kevin Graves Chief, UST Section