

## PSTIF

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**Sent:** Friday, February 05, 2016 2:59 PM  
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**Subject:** Draft PSTIF Guidance on Costs Incurred during UST Closures

Latest Leads on Missouri Tank Site Cleanups...

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# LATEST LEADS

ON MISSOURI TANK SITE CLEANUPS

*A newsletter for environmental professionals to keep you posted on developments of interest*

## Draft PSTIF Guidance on Costs Incurred during UST Closures

UST closures present a unique challenge for consultants and the PSTIF, as it is often difficult to distinguish "cleanup costs" from costs normally incurred during in-place closure or removal of the UST system. The PSTIF can only pay for "cleanup costs" – *not* costs of the closure itself.

Shortly after DNR's publication of its "Tanks RBCA Guidance" in 2004, a webinar was held for consultants to discuss this issue. DNR and PSTIF staff encouraged consultants to do some planning before embarking on the closure – i.e., Decide what cleanup standards apply to the site, based on land use, whether there is a likely risk to drinking water, etc. Consultants were encouraged to collect a "landfill pre-qualification sample" to determine whether impact above DTLs exists; many have since

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### QUESTIONS?

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made this a standard operating practice to assure subsequent consulting fees and lab costs were eligible for PSTIF reimbursement.

We have continued to encourage this approach over the last twelve years. However, we have not always been perfectly clear and consistent in communicating what costs we will reimburse, or perhaps even in our review of invoices after costs were incurred.

In recent months, we've received related inquiries regarding what costs are reimbursable when tanks are emptied and/or closed in place.

We have recently completed a thorough internal review of these issues, with the goal of producing a document that clearly explains what is reimbursable; the [attached draft guidance](#) is the result. It does not reflect any major policy changes; rather, it purposely references the Board's longstanding regulations and attempts to improve clarity and consistency on what the PSTIF can legally pay for.

*We invite your careful review and feedback by February 26.* Please email comments to [pstif@sprintmail.com](mailto:pstif@sprintmail.com)

Thank you,

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## CONTACT

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