

# Moving Sites to Closure (MStC) for Petroleum Underground Storage Tank (UST) Releases

ASTM Standard E3488-25

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## The US EPA Office of Underground Storage Tanks (UST) is encouraging UST implementing agencies to:

- Develop and implement threat analysis procedures to reevaluate open releases and inform next steps.
- Incorporate today's best practices, tools, and scientific understanding of petroleum releases.
- Make threat analysis process transparent so owners/other stakeholders can better analyze threats from their releases and propose alternative courses of action for regulators to consider.



# MStC ASTM Standard E3488

Provides a framework based on the latest science and best practices for

- conducting threat assessments and
- moving UST release sites to closure

# Difference between Threat Assessment and Risk Assessment

Both focused on protection of human health and the environment

Risk Based Correction Action Applied at Petroleum Release Sites RBCA E1739-95

- Tiered approach
- Focuses on Risk

Standard guide for moving sites to closure (MStC) for petroleum underground Storage tank releases

- Builds upon risk-based approach and takes it one step further
- **Alternate closure criteria for**
  - LNAPL
  - Soil
  - Soil gas
  - GW



# Moving Sites to Closure Framework

- Uses exposure threat assessments to
  - Evaluate the potential for a release from a petroleum UST to reach a human or ecological receptor.

BY examining the

- Stability of contamination remaining in the subsurface
  - Pathways to receptors
  - Potential of contamination to reach receptors
- Sites with
  - High threats = further corrective action
  - Undetermined threats = further investigation
  - Low threat = does not need further corrective action

## DEQ is currently working on how low threat closures can be implemented in Montana.

Similar to OUST's guidance, DEQ believes it will entail a multi-pronged (ABC) approach, including:

- Alignment w/ regulatory frameworks (modify rules/ guidance)
- Building stakeholder consensus and a
- Clear criteria for case closure (risk/threat/technical considerations) in a policy document



# Timeline

- **Phase 1: Information Gathering (Dec 2025 – Apr 2026)**
  - Review Montana standards and other states' policies.
  - Complete EPA training.
  - Identify statutes/rules needing changes.
  - Begin stakeholder outreach.
- **Phase 2: Policy Adaptation & Rule Drafting (May – Aug 2026)**
  - Draft Montana-specific low-threat criteria.
  - Prepare rule changes and guidance manual.
- **Phase 3: Stakeholder Engagement (Jul – Oct 2026)**
  - Host workshops/webinars.
  - Gather feedback from industry, tribal, and rural communities.



# Timeline

- **Phase 4: Legislative & Regulatory Integration (Nov 2026 – Mar 2027)**
  - Finalize rules and guidance.
  - Coordinate training for rollout.
- **Phase 5: Pilot Program (Mar 2026 – Mar 2027)**
  - Test policy at 5–10 sites.
  - Monitor and refine based on outcomes.
- **Phase 6: Full Implementation & Continuous Improvement (2027 onward)**
  - Statewide rollout.
  - Update policy every 3–5 years.





# Thank You!

Q's/Concerns/Ideas- Contact

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