

Strategies To Increase LUST Cleanups: Lessons From States

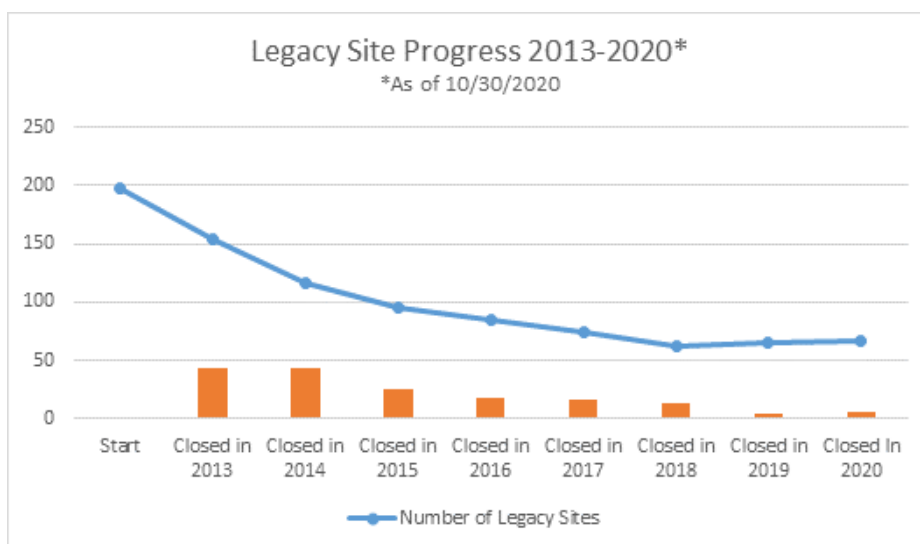
Minnesota Commits To Continuous Improvement And Reducing The Number Of Legacy Underground Storage Tank Releases

Summary

- In 2013, Minnesota began a focused examination of active leaking underground storage tank (LUST) releases that were more than ten years old and pre-dated their current investigation and corrective action policies. Since the project's inception, Minnesota has identified 238 active sites meeting the project's criteria and are defined as legacy releases.
- Minnesota identified site challenges, examined their internal processes, and evaluated causes and barriers at their identified legacy releases in order to develop solutions focused on progressing legacy releases towards site closure.
- They developed an array of project management solutions including creating site-specific implementation plans and milestones, developing innovative review approaches for complex releases, and redistributing the state's workload in order to provide greater resources on legacy sites.

Results

- As of October 2020, Minnesota reduced the number of active legacy releases from 238 to 67.
- Minnesota has 388 remaining open releases as of October 2020. Since the beginning of the federal underground storage tank program in 1988, Minnesota has closed 97 percent of their reported confirmed releases.



Minnesota identified 198 legacy sites at the start of the project. Since January 2014, they added 40 sites totaling 238 legacy sites in the state. 67 legacy sites remain open.

Lessons Learned

- *Management engagement, timelines, and check-ins* – Program managers meet with project staff every six months for updates on each legacy site, routinely evaluating their progress. In between updates, the project staff work on a specific timeline created at the beginning of the project for the day-to-day oversight of each site.



- *Spread the wealth* – Minnesota redistributed the state’s workload and provided additional support by spreading the complex legacy LUST releases among their case managers.
- *Add technical support as needed* –The program occasionally elects to involve a third-party state contractor during the review of legacy release sites to add additional technical expertise in developing solutions for these releases.
- *Tweak controls* – In order to adequately address risks and impacts based on geology and groundwater usage, Minnesota updated their groundwater policy to include additional requirements for sensitive groundwater conditions. These include wellhead protection areas, shallow bedrock, soul-source aquifers that are the only available drinking water source, and shallow sand and gravel aquifers.
- *Make it easier to do source removal* – They clarified their guidance on soil excavation to increase the amount of source allowed to be removed without approval at the start of a cleanup. They also added that excavation should occur when there is petroleum-saturated soil present during tank removal.
- *Train staff and play to their strengths* – Minnesota re-educated staff on enforcement tools and corrective action options, while also making a conscious effort to utilize staff strengths and experiences in assigning and reassigning difficult sites.

Background

- Minnesota created a temporary cross-sectional review team at the start of the project to analyze and categorize the legacy LUST releases. The categories included: current policy provides a path to closure; additional assessment or remediation needed; and complex LUST releases. The complex LUST release category included complex geology, sensitive ground or surface water areas, poor performance of remediation systems, and administrative or legal issues.
- Program managers developed the Site Decision Committee (SDC), a rotating selection of site reviewers that includes hydrologists and project managers. The SDC presents recommended next steps on each site to managers, which ultimately provides feedback on the best path forward.

For More Information

- [Minnesota Pollution Control Agency Petroleum Remediation Program](https://www.epa.gov/ust), 651-297-8380

