

PADEP Considering ASTM Standard Guide for Moving Sites to Closure for Petroleum UST Releases



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Environmental Alert

(by **Tim Bytner**)

On September 2, 2026, the Pennsylvania Department of Environmental Protection (PADEP) held a quarterly Storage Tank Advisory Committee (STAC) meeting wherein Thomas Shruben, Physical Scientist of the U.S. Environmental Protection Agency Office of Underground Storage Tanks, presented information on ASTM E3488-25 *Standard Guide for Moving Sites to Closure (MStC) for Petroleum Underground Storage Tank (UST) Releases* (ASTM E3488-25). The purpose of the presentation was to provide a background of the standard to STAC members and inform the members of recent updates.

ASTM E3488-25 is intended to provide parties involved in the cleanup of petroleum releases from USTs, such as responsible parties and regulators, with guidance on methods to more quickly move through the remedial process and achieve closure of the site more quickly while remaining protective of human health and the environment. For example, a site proceeding to closure using considerations of ASTM E3488-25 may contemplate the cessation of monitoring of a natural attenuation remedy if existing monitoring results demonstrate a trend toward the achievement of natural attenuation goals as opposed to the actual achievement of those goals.^[1]

At the time of the STAC meeting, ASTM E3488-25 was adopted, to varying extents, only in North Carolina, Wisconsin, and Washington, DC. A handful of state agencies, including the PADEP, are considering adopting the standard to some extent. Consideration would have to be given to how the standard would integrate into a state's existing statutory and regulatory framework prior to adoption of ASTM E3488-25 or portions thereof.^[2]

The potential adoption and implementation of ASTM E3488-25 presents an interesting opportunity to progress sites that have had a petroleum release from USTs to closure in a faster and more efficient and cost-effective manner. If you have questions about the standard or how its adoption may impact your facility, please contact Tim Bytner at (412) 394-6504 or tbytner@babstcalland.com.

^[1] *Into the MStC: ASTM's E3488-25 Standard Guide for Moving Sites to Closure (MStC) for Petroleum Underground Storage Tank (UST) Release*, Pennsylvania Department of Environmental Protection Storage Tank Advisory Committee meeting (September 2, 2026).

^[2] *Id.*