



## ENERGY AND ENVIRONMENT CABINET

Matthew G. Bevin  
Governor

DEPARTMENT FOR ENVIRONMENTAL PROTECTION  
DIVISION OF WASTE MANAGEMENT  
UNDERGROUND STORAGE TANK BRANCH  
200 FAIR OAKS LANE, 2<sup>ND</sup> FLOOR  
FRANKFORT, KENTUCKY 40601  
<http://waste.ky.gov/ust>

Charles G. Snively  
Secretary

February 2, 2016

### Notice

To

**UNDERGROUND STORAGE TANK OWNERS AND OPERATORS**

and

**UNDERGROUND STORAGE TANK CERTIFIED CONTRACTORS**

**Effective Immediately**

**Notice Regarding Underground Storage Tanks Closed in Place:** Section 7.4 of the Closure Outline, (August 2011), directs that Underground Storage Tanks closed in place must be filled with an "inert" solid. The term "inert" is intended to include the concept that the material is stable or motionless and that the material is chemically inactive. Thus, both examples given in the Closure Outline, sand and concrete, are stable and chemically inactive. Foam, of various kinds, has been used to close USTs in place. It is my understanding that the previous UST Branch manager approved of its' use. Foams are structurally weak, and once the UST loses integrity, an area filled with foam may collapse. Foams are not chemically "inert". These two points are significant not only because of the term "inert," but also because, once a tank is closed, in place it is no longer considered to be a tank but is, rather, part of the subsurface. In order to avoid potential collapses, and to allow closed tanks to be viewed as simply part of the subsurface, foam is not to be used to close USTs.

Edward Winner, Manager



Underground Storage Tanks Branch