

June 19, 2013

U.S. Environmental Protection Agency  
Mail Code 28221T  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

**Re: Docket ID No. EPA-HQ-RCRA-2002-0033  
Guidance for Addressing Petroleum Vapor Intrusion at  
Leaking Underground Storage Tank Sites**

Dear Madam/Sir:

The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) Tanks Subcommittee, through the Leaking Underground Storage Tank (LUST) Task Force, is providing the following comments to the April 2013 draft guidance titled, "Guidance for Addressing Petroleum Vapor Intrusion at Leaking Underground Storage Tank Sites-External Draft Review."

ASTSWMO is an association representing waste management and remediation programs of the 50 States, five Territories and the District of Columbia (States). Our membership includes State waste program experts in the management and regulation of wastes from Underground Storage Tanks. The comments reflect only the general view of the Tanks Subcommittee and have not been reviewed or adopted by the ASTSWMO Board of Directors or other Program Subcommittees.

We applaud the U.S. Environmental Protection Agency, Office of Underground Storage Tanks (OUST), for developing this draft guidance, as it represents significant progress and provides a tremendous amount of valuable data. Specifically, our membership appreciates the emphasis on the development of an appropriate conceptual site model (CSM) in evaluating a potential petroleum vapor intrusion (PVI) risk. Using the CSM results, in conjunction with separation distances recommended in the guidance, allows for a common sense approach to evaluating sites for PVI. The Tanks Subcommittee looks forward to working with EPA to continue building the database of case histories, which are used to justify the separation distances recommended in this guidance.

While some States find the draft guidance in line with their current practices, others find the guidance too proscriptive or too liberal. It is anticipated that States will find this guidance beneficial as a supplement to existing State PVI guidance or as a model for implementing PVI investigations. The Tanks Subcommittee encouraged individual States programs to provide comments based on their own perspectives and experiences.

Should you have any questions or require additional information, please contact Chuck Schwer (VT), ASTSWMO Tanks Subcommittee Chair, at (802) 249-5324, or Stephen G. Reuter (NM), Chair, ASTSWMO LUST Task Force at (505) 222-9577.

Sincerely,



Chuck Schwer (VT)  
Chair, ASTSWMO Tanks Subcommittee



Stephen G. Reuter (NM)  
Chair, ASTSWMO LUST Task Force

cc: ASTSWMO LUST Task Force  
ASTSWMO Tanks Subcommittee  
Carolyn Hoskinson, Director, U.S. EPA OUST