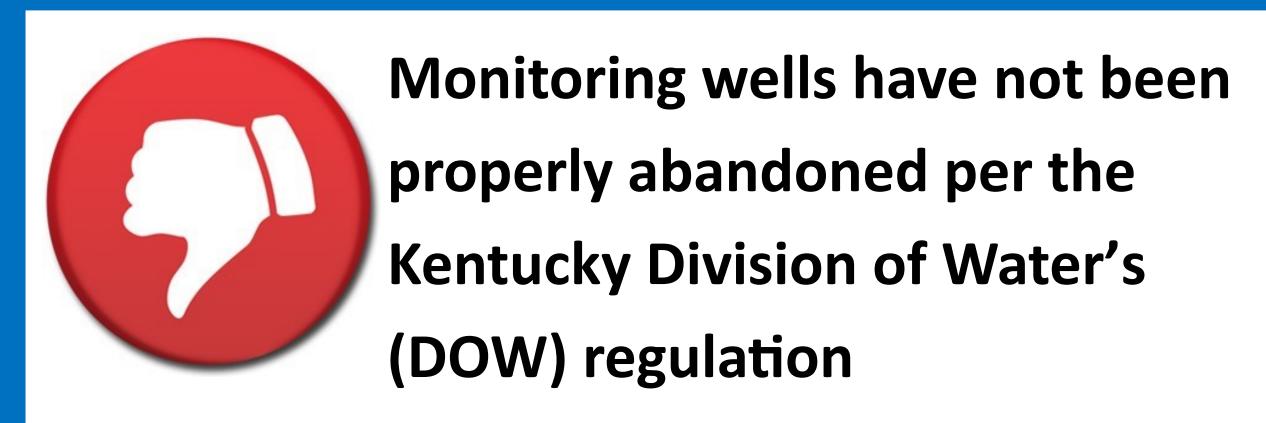
## UST Fund Plans to Alleviate Monitoring Well Abandonment Inconsistencies



Kentucky Underground Storage Tank Branch — Claims and Payments — Christina Baker, Melinda Buffin, Brenda Harlow, Darlene Murphy, Jill Stoltz, Michele Westerfield, and Cheryl Yunt



Failure in abandonments include:

- 1. Failure to abandon monitoring wells yet making reimbursement claims for having done so.
- 2. Failure to over-drill monitoring wells but claiming to have done so; no variance was obtained.
- 3. Failure to accurately complete Uniform Kentucky Well Maintenance and Plugging Records— forms include important details pertaining to well abandonment.



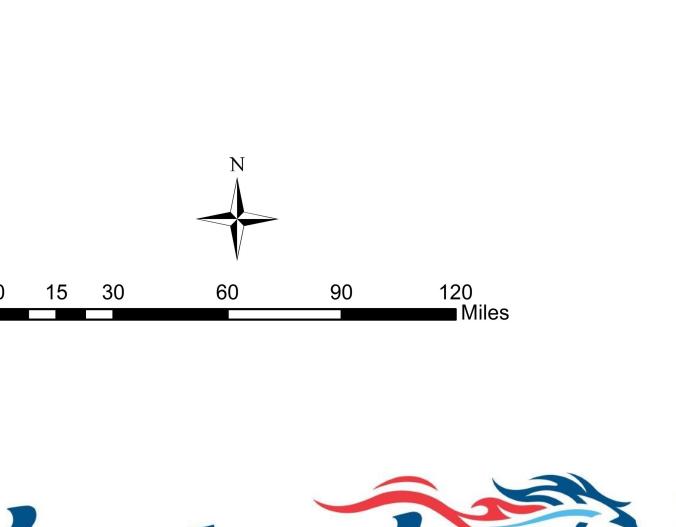


BEFORE



**BEFORE** 

Before and after monitoring well abandonment





Monitoring well abandonment occurs after a UST site has received no further action (NFA). A report documenting the abandonment was not subject to technical review, however, was reviewed for administrative completeness. The Kentucky Underground Storage Tank (UST) Branch Corrective Action (CA) project managers are responsible for reviewing technical reports, but monitoring well closures were routed directly to UST Claims and Payments staff who would verify monitoring well abandonment through administrative review of the Uniform Kentucky Well Maintenance and Plugging Records as provided by the UST contractor. While staff within the Claims and

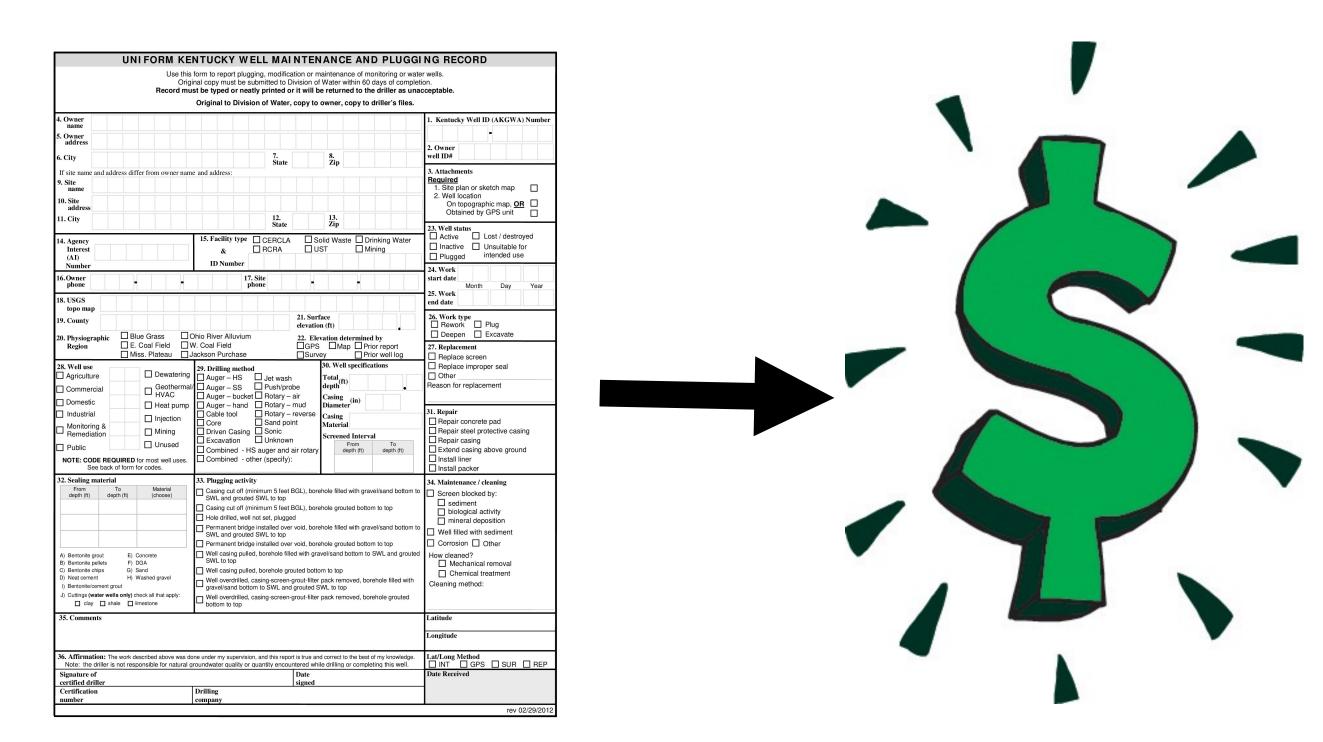
Payments section complete

to conduct technical reviews.

accurate claim reviews, they were

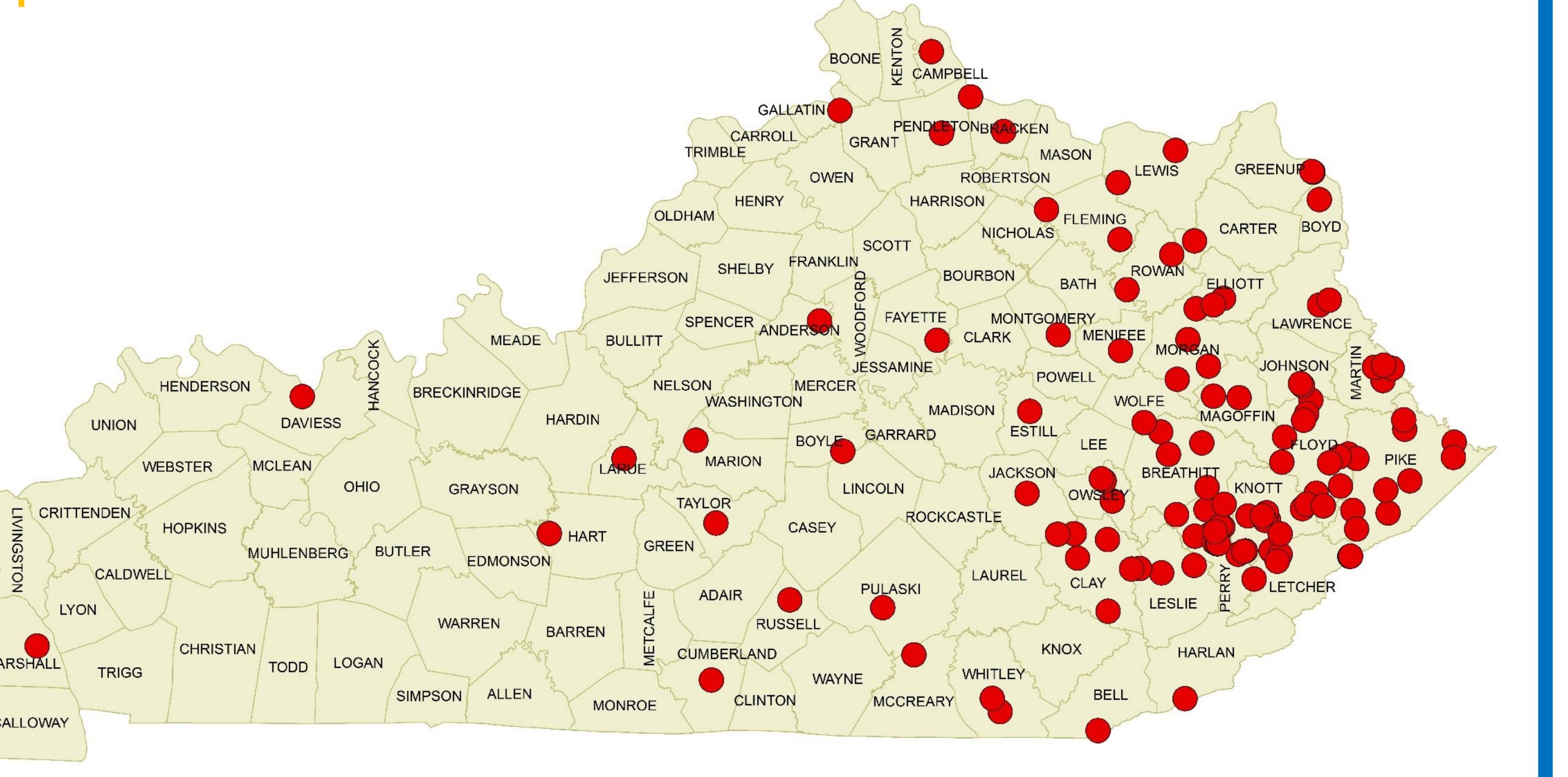
not expected nor were they trained

Reimbursement for monitoring well abandonment takes place upon receiving a:



- \$ Receipt of the DOW Uniform Kentucky Well Maintenance and Plugging Record form signed by a certified well driller
- \$ Review of the records

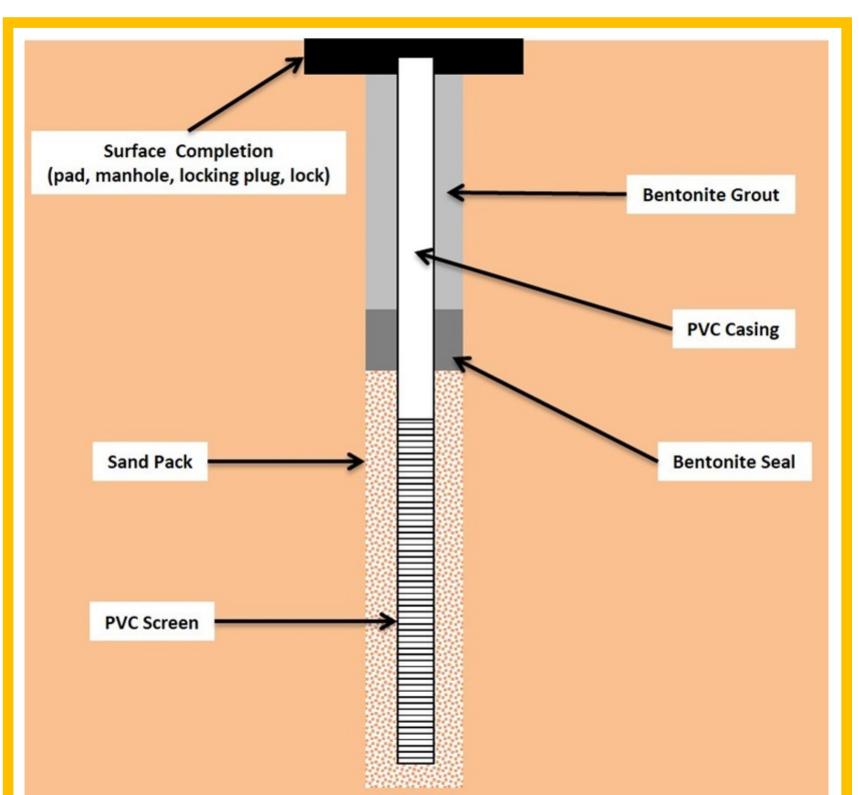
Through site visits several sites — with Monitoring Wells incorrectly abandoned or still in place were verified.



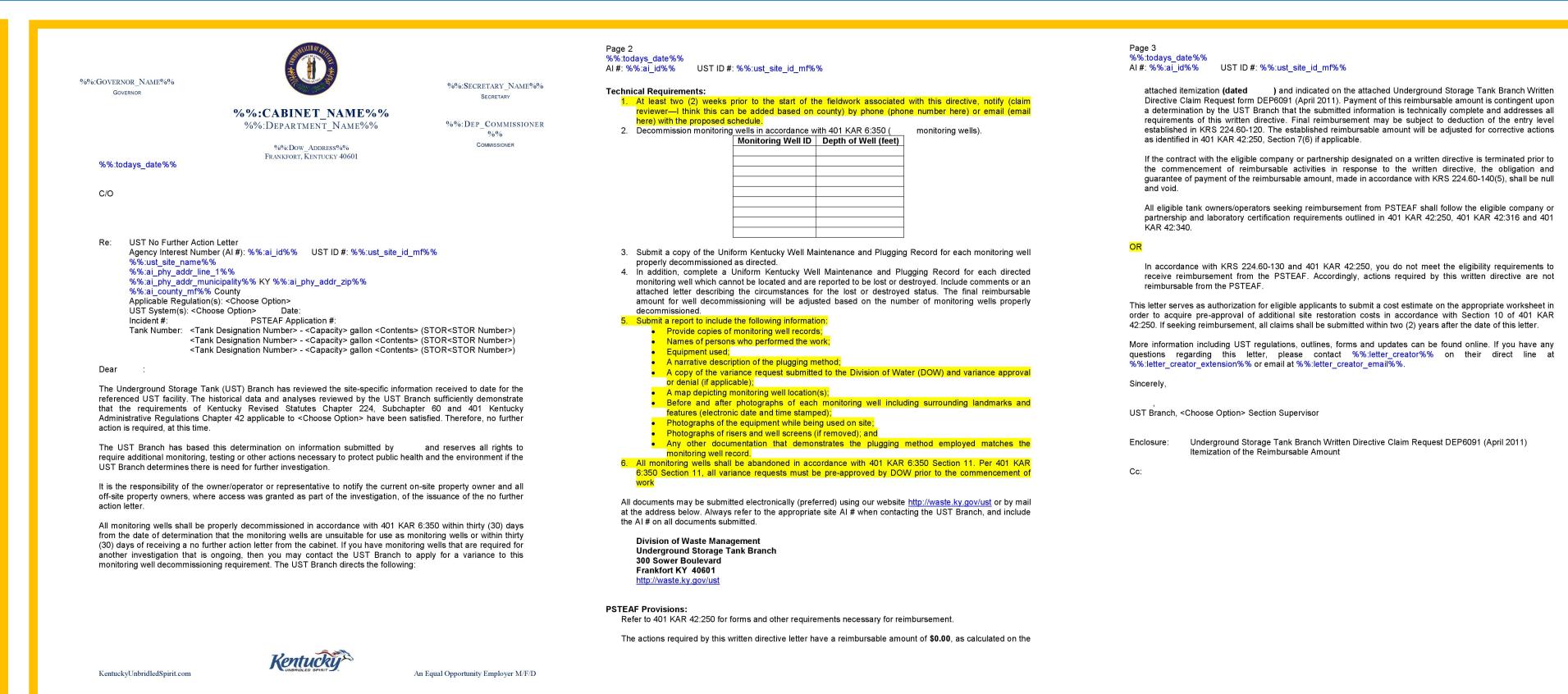
Because the Claims and Payments staff reviewed post NFA monitoring well abandonments for reimbursement purposes only, action was needed to address the inconsistencies observed. Claims and Payments staff worked with CA project managers to formulate a plan to alleviate these inconsistencies:

- . Receive training on proper abandonment procedures. An in-house training was conducted by CA staff. The training focused on the importance of detecting inconsistencies and provided guidance for review of well records.
- Add new requirements for monitoring well abandonment reporting to NFA letters. Additional wording in the letter requires photos, a narrative detailing plugging method, and notifying staff when scheduling abandonment activities.
- 8. Perform random site visits to observe monitoring well abandonment activities. KRS 224.60-130 (I) states that staff may enter and inspect facilities to determine the reasonableness and necessity of the cost of corrective action.

By taking these measures an increase in compliance with regulations, prevention fraud, and strengthened operations of the UST Branch as an entity is expected.



Training included details of monitoring well construction enabling staff to properly investigate these documents when reviewing monitoring well abandonments.



Additions to the NFA letter require report submissions to include these requested items. In

the future a reporting cost will be added to alleviate the time and effort it takes when

submitting the additions. The highlighted items above include new requirements for

If these preventive measures prove to be effective, the Claims and Payments staff will make routine site visits a part of regular job duties. If inconsistencies are discovered, or if the UST Branch is not notified prior to abandonment activities, reimbursements will be affected. Currently 43 monitoring well abandonment obligations totaling approximately \$600,000 has been directed. Claims and Payments staff are planning to oversee these well abandonments when notified by the UST contractor.

monitoring well abandonment report submissions.

