

Semiannual Report Of UST Performance Measures End Of Fiscal Year 2014 (October 1, 2013 – September 30, 2014)

Where does EPA get the performance data?

Twice each year, EPA collects data from states and territories regarding underground storage tank (UST) performance measures and makes the data publicly available. EPA directly provides data on work in Indian country, since the Agency implements the program for those sites. This data includes information such as the number of active and closed tanks, releases confirmed, cleanups initiated and completed, facilities in compliance with UST requirements, and inspections. EPA compiles the data and presents it in table format for all states, territories, and Indian country.

What are the UST performance measures?

The most current definitions for the UST performance measures are available on EPA's website www.epa.gov/oust/cat/camarchv.htm under **Definitions**.

What is in the end of fiscal year (FY) 2014 report?

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How does the UST program's performance compare with its goals?

| FY 2014 UST Program Performance | FY 2014 UST Program Goal |
|--|---|
| Exceeded the FY 2014 goal by completing 10,393 cleanups; missed the Indian country cleanup goal, but completed 26 cleanups in Indian country | Complete 9,000 or more cleanups, including 37 in Indian country |
| Exceeded the FY 2014 goal by achieving a significant operational compliance rate of 72.5 percent | Achieve a significant operational compliance rate of 70 percent or higher |
| Exceeded the FY 2014 goal by reporting 6,847 newly-confirmed releases | Decrease newly-confirmed releases to fewer than 7,330 |
| Exceeded the FY 2014 goal by reducing to 14.2 percent the percent of confirmed releases at UST facilities remaining to be cleaned up | Reduce to 15 percent or less the percent of confirmed releases at UST facilities remaining to be cleaned up |

What other highlights are included in the end of FY 2014 report?

- There are 570,731 active USTs (at approximately 205,000 sites) which are regulated by EPA's UST program
- Since the 1984 inception of the UST program, 1,816,695 USTs have been properly closed
- Of the 521,271 releases reported since the beginning of the UST program, 447,323 (or 85.8 percent) have been cleaned up, leaving 73,948 remaining to be cleaned up



- From FY 2010 through FY 2013, the UST program saw increased performance in cleaning up and closing releases due in part to a one-time infusion of LUST Recovery Act money
- 92,883 on-site inspections at federally-regulated UST facilities were conducted between October 2013 and September 2014; of those:
 - 92,524 were conducted by states, territories, and third-party inspectors
 - 359 were conducted by EPA and credentialed tribal inspectors in Indian country

How are EPA and its partners doing at reducing the backlog of UST releases?

Reducing the number of releases remaining to be cleaned up (also known as the backlog) remains a priority for the national UST program. The graphic on page 6 of this report shows that the national UST backlog of releases remaining to be cleaned up has been declining for more than a decade. The rate of releases confirmed has held steady since 2010 at approximately 6,000 to 7,000 releases reported each year; the cumulative number of confirmed releases is now over 521,000. Viewed together, these data points show the progress EPA, states, territories, tribes, and other UST partners are making in reducing the percent of confirmed releases at UST facilities pending cleanup completion.

Over the last few years, the percent of confirmed releases pending cleanup completion has declined from 20.5 percent in 2009 to 14.2 percent at end of FY 2014. Looking back several more years, the percent of confirmed releases pending cleanup completion was 29 percent in 2004.

| Fiscal Year | Confirmed Releases | | Cleanups Remaining | Percent Of Confirmed Releases Pending Cleanup Completion* |
|-------------|--------------------|------------|--------------------|---|
| | Each Year | Cumulative | | |
| 2014 | 6,847 | 521,271 | 73,948 | 14.2% |
| 2013 | 6,128 | 514,123 | 77,717 | 15.1% |
| 2012 | 5,674 | 507,540 | 82,903 | 16.3% |
| 2011 | 5,998 | 501,723 | 87,983 | 17.5% |
| 2010 | 6,328 | 494,997 | 93,123 | 18.8% |
| 2009 | 7,168 | 488,496 | 100,165 | 20.5% |
| ↓ | ↓ | ↓ | ↓ | ↓ |
| 2004 | 7,850 | 447,233 | 129,827 | 29% |

*Divide cleanups remaining by cumulative confirmed releases

Where can I find performance data from previous years?

EPA's website www.epa.gov/oust/cat/camarchv.htm provides the most current report, as well as historical reports beginning with FY 1988, the first year reports were developed. Reports are listed beginning with the most recent first.

For more information, contact Steven McNeely, EPA's Office of Underground Storage Tanks, at mcneely.steven@epa.gov or 703-603-7164.

UST Corrective Action Measures for End of Year FY 2014 (Data through September 30, 2014)

| Region / State | Active Tanks | Closed Tanks | Confirmed Releases | | Cleanups Initiated | Cleanups Completed | | Cleanups Remaining |
|-----------------|---------------|----------------|--------------------|---------------|--------------------|--------------------|---------------|--------------------|
| | | | Actions This Year | Cumulative | | Actions This Year | Cumulative | |
| ONE | | | | | | | | |
| CT | 6,279 | 26,334 | 49 | 3,030 | 3,017 | 43 | 2,196 | 834 |
| MA | 9,739 | 25,359 | 44 | 6,398 | 6,329 | 82 | 6,170 | 228 |
| ME | 2,738 | 13,344 | 38 | 2,726 | 2,726 | 58 | 2,674 | 52 |
| NH | 2,979 | 11,944 | 21 | 2,604 | 2,604 | 46 | 1,996 | 608 |
| RI | 1,548 | 8,520 | 7 | 1,374 | 1,374 | 11 | 1,219 | 155 |
| VT | 2,019 | 6,051 | 7 | 2,147 | 2,147 | 35 | 1,468 | 679 |
| Subtotal | 25,302 | 91,552 | 166 | 18,279 | 18,197 | 275 | 15,723 | 2,556 |
| TWO | | | | | | | | |
| NJ | 13,795 | 63,929 | 1,618 | 13,236 | 13,133 | 1,126 | 9,775 | 3,461 |
| NY | 23,192 | 102,728 | 308 | 29,409 | 29,360 | 456 | 28,060 | 1,349 |
| PR | 4,489 | 5,785 | 4 | 1,068 | 836 | 1 | 499 | 569 |
| VI | 143 | 279 | 2 | 29 | 28 | 1 | 22 | 7 |
| Subtotal | 41,619 | 172,721 | 1,932 | 43,742 | 43,357 | 1,584 | 38,356 | 5,386 |
| THREE | | | | | | | | |
| DC | 634 | 3,370 | 12 | 913 | 898 | 15 | 819 | 94 |
| DE | 1,214 | 7,367 | 49 | 2,746 | 2,684 | 73 | 2,639 | 107 |
| MD | 7,803 | 35,719 | 165 | 12,086 | 11,912 | 204 | 11,825 | 261 |
| PA | 22,805 | 65,696 | 246 | 15,962 | 15,800 | 288 | 13,870 | 2,092 |
| VA | 18,199 | 62,069 | 133 | 12,326 | 12,233 | 182 | 11,974 | 352 |
| WV | 4,565 | 20,820 | 73 | 3,541 | 3,461 | 90 | 2,825 | 716 |
| Subtotal | 55,220 | 195,041 | 678 | 47,574 | 46,988 | 852 | 43,952 | 3,622 |

Definition of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at www.epa.gov/oust/cat/PMDefinitions.pdf

UST Corrective Action Measures for End of Year FY 2014 (Data through September 30, 2014)

| Region / State | Active Tanks | Closed Tanks | Confirmed Releases | | Cleanups Initiated | Cleanups Completed | | Cleanups Remaining |
|-----------------|----------------|----------------|--------------------|----------------|--------------------|--------------------|----------------|--------------------|
| | | | Actions This Year | Cumulative | | Actions This Year | Cumulative | |
| FOUR | | | | | | | | |
| AL | 17,980 | 30,619 | 77 | 11,841 | 11,706 | 117 | 10,616 | 1,225 |
| FL | 22,363 | 111,428 | 84 | 26,838 | 17,943 | 344 | 15,140 | 11,698 |
| GA | 29,283 | 49,723 | 223 | 13,421 | 13,220 | 356 | 12,190 | 1,231 |
| KY | 10,088 | 39,915 | 222 | 16,345 | 16,320 | 392 | 15,502 | 843 |
| MS | 8,209 | 23,661 | 122 | 7,593 | 7,461 | 90 | 7,224 | 369 |
| NC | 25,850 | 69,472 | 274 | 25,779 | 23,360 | 387 | 21,285 | 4,494 |
| SC | 11,716 | 33,404 | 68 | 9,793 | 9,446 | 147 | 7,449 | 2,344 |
| TN | 16,465 | 40,015 | 207 | 14,837 | 14,801 | 255 | 14,518 | 319 |
| Subtotal | 141,954 | 398,237 | 1,277 | 126,447 | 114,257 | 2,088 | 103,924 | 22,523 |
| FIVE | | | | | | | | |
| IL | 20,022 | 68,368 | 348 | 26,093 | 24,392 | 750 | 22,084 | 4,009 |
| IN | 13,208 | 39,670 | 155 | 9,679 | 9,606 | 277 | 7,796 | 1,883 |
| MI | 18,353 | 70,315 | 154 | 22,548 | 22,156 | 488 | 14,010 | 8,538 |
| MN | 12,207 | 33,034 | 170 | 11,297 | 11,184 | 202 | 10,917 | 380 |
| OH | 21,923 | 46,333 | 526 | 30,658 | 30,512 | 604 | 28,502 | 2,156 |
| WI | 14,273 | 68,282 | 94 | 19,333 | 19,139 | 145 | 18,282 | 1,051 |
| Subtotal | 99,986 | 326,002 | 1,447 | 119,608 | 116,989 | 2,466 | 101,591 | 18,017 |

Definition of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at www.epa.gov/oust/cat/PMDefinitions.pdf

UST Corrective Action Measures for End of Year FY 2014 (Data through September 30, 2014)

| Region / State | Active Tanks | Closed Tanks | Confirmed Releases | | Cleanups Initiated | Cleanups Completed | | Cleanups Remaining |
|-----------------|---------------|----------------|--------------------|---------------|--------------------|--------------------|---------------|--------------------|
| | | | Actions This Year | Cumulative | | Actions This Year | Cumulative | |
| SIX | | | | | | | | |
| AR | 8,892 | 21,515 | 33 | 1,686 | 1,397 | 42 | 1,401 | 285 |
| LA | 11,024 | 35,312 | 136 | 4,893 | 4,893 | 156 | 4,055 | 838 |
| NM | 3,736 | 12,850 | 6 | 2,602 | 2,318 | 13 | 1,766 | 836 |
| OK | 10,053 | 27,763 | 71 | 5,090 | 5,089 | 79 | 4,711 | 379 |
| TX | 50,724 | 120,236 | 248 | 27,113 | 26,222 | 282 | 25,419 | 1,694 |
| Subtotal | 84,429 | 217,676 | 494 | 41,384 | 39,919 | 572 | 37,352 | 4,032 |
| SEVEN | | | | | | | | |
| IA | 6,720 | 23,401 | 28 | 6,143 | 5,930 | 129 | 5,289 | 854 |
| KS | 6,561 | 20,977 | 44 | 5,161 | 5,032 | 59 | 3,799 | 1,362 |
| MO | 9,015 | 31,795 | 98 | 6,929 | 6,912 | 109 | 6,019 | 910 |
| NE | 6,562 | 15,031 | 54 | 6,395 | 5,345 | 125 | 5,062 | 1,333 |
| Subtotal | 28,858 | 91,204 | 224 | 24,628 | 23,219 | 422 | 20,169 | 4,459 |
| EIGHT | | | | | | | | |
| CO | 7,414 | 22,584 | 115 | 8,068 | 7,775 | 162 | 7,420 | 648 |
| MT | 3,155 | 11,769 | 20 | 3,064 | 2,927 | 79 | 2,163 | 901 |
| ND | 2,221 | 7,492 | 3 | 870 | 853 | 2 | 834 | 36 |
| SD | 2,876 | 7,261 | 37 | 2,718 | 2,577 | 20 | 2,565 | 153 |
| UT | 3,684 | 13,753 | 59 | 4,823 | 4,765 | 95 | 4,466 | 357 |
| WY | 1,731 | 8,040 | 13 | 2,668 | 2,449 | 108 | 1,756 | 912 |
| Subtotal | 21,081 | 70,899 | 247 | 22,211 | 21,346 | 466 | 19,204 | 3,007 |

Definition of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at www.epa.gov/oust/cat/PMDefinitions.pdf

UST Corrective Action Measures for End of Year FY 2014 (Data through September 30, 2014)

| Region / State | Active Tanks | Closed Tanks | Confirmed Releases | | Cleanups Initiated | Cleanups Completed | | Cleanups Remaining |
|-----------------|---------------|----------------|--------------------|---------------|--------------------|--------------------|---------------|--------------------|
| | | | Actions This Year | Cumulative | | Actions This Year | Cumulative | |
| NINE | | | | | | | | |
| AS | 5 | 63 | 0 | 8 | 7 | 0 | 7 | 1 |
| AZ | 6,672 | 21,645 | 76 | 8,786 | 8,229 | 61 | 8,060 | 726 |
| CA | 37,207 | 131,054 | 114 | 44,381 | 42,264 | 1,281 | 38,745 | 5,636 |
| GU | 244 | 472 | 0 | 139 | 139 | 0 | 119 | 20 |
| HI | 1,557 | 5,528 | 24 | 2,076 | 2,036 | 18 | 1,938 | 138 |
| MP | 72 | 62 | 0 | 11 | 11 | 0 | 11 | 0 |
| NV | 3,763 | 7,507 | 6 | 2,521 | 2,521 | 13 | 2,374 | 147 |
| Subtotal | 49,520 | 166,331 | 220 | 57,922 | 55,207 | 1,373 | 51,254 | 6,668 |
| TEN | | | | | | | | |
| AK | 1,014 | 6,706 | 34 | 2,400 | 2,371 | 54 | 2,059 | 341 |
| ID | 3,344 | 10,972 | 4 | 1,486 | 1,457 | 15 | 1,379 | 107 |
| OR | 5,586 | 26,408 | 45 | 7,426 | 7,259 | 87 | 6,550 | 876 |
| WA | 10,302 | 36,801 | 67 | 6,789 | 6,337 | 113 | 4,733 | 2,056 |
| Subtotal | 20,246 | 80,887 | 150 | 18,101 | 17,424 | 269 | 14,721 | 3,380 |

Definition of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at www.epa.gov/oust/cat/PMDefinitions.pdf

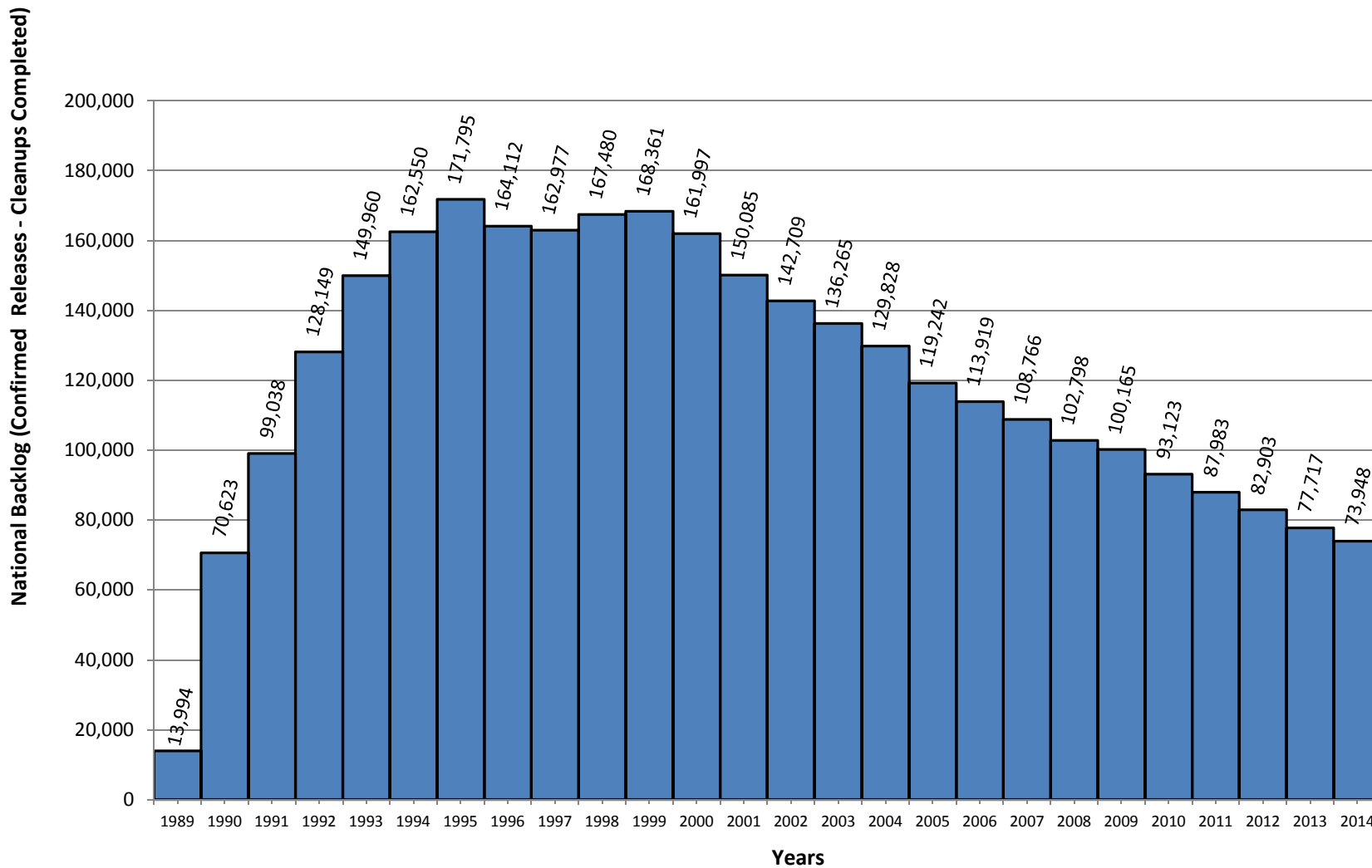
UST Corrective Action Measures for End of Year FY 2014 (Data through September 30, 2014)

| Region / State | Active Tanks | Closed Tanks | Confirmed Releases | | Cleanups Initiated | Cleanups Completed | | Cleanups Remaining |
|---|---------------------|---------------------|---------------------------|-------------------|---------------------------|---------------------------|-------------------|---------------------------|
| | | | Actions This Year | Cumulative | | Actions This Year | Cumulative | |
| REGIONAL CORRECTIVE ACTIONS FOR INDIAN COUNTRY | | | | | | | | |
| REGION 1 | 13 | 5 | 0 | 1 | 1 | 0 | 1 | 0 |
| REGION 2 | 156 | 28 | 0 | 6 | 6 | 0 | 5 | 1 |
| REGION 3 | N/A ¹ | N/A ¹ | N/A ¹ | N/A ¹ | N/A ¹ | N/A ¹ | N/A ¹ | 0 |
| REGION 4 | 70 | 75 | 0 | 15 | 15 | 0 | 10 | 5 |
| REGION 5 | 471 | 1,043 | 1 | 241 | 223 | 3 | 176 | 65 |
| REGION 6 | 344 | 298 | 2 | 67 | 67 | 1 | 64 | 3 |
| REGION 7 | 80 | 96 | 1 | 21 | 21 | 0 | 13 | 8 |
| REGION 8 | 542 | 2,138 | 1 | 542 | 534 | 12 | 407 | 135 |
| REGION 9 | 451 | 1,360 | 4 | 297 | 223 | 7 | 228 | 69 |
| REGION 10 | 389 | 1,102 | 3 | 185 | 181 | 3 | 173 | 12 |
| SUBTOTAL | 2,516 | 6,145 | 12 | 1,375 | 1,271 | 26 | 1,077 | 298 |
| | Active Tanks | Closed Tanks | Confirmed Releases | | Cleanups Initiated | Cleanups Completed | | Cleanups Remaining |
| | | | Actions This Year | Cumulative | | Actions This Year | Cumulative | |
| NATIONAL TOTAL | 570,731 | 1,816,695 | 6,847 | 521,271 | 498,173 | 10,393 | 447,323 | 73,948 |

Definitions of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at www.epa.gov/oust/cat/PMDefinitions.pdf

¹ N/A = Not Applicable. EPA Region 3 does not have any federally recognized tribes.

**UST National Backlog:
FY 1989 Through End of Year
FY 2014**



**UST Compliance Measures
for End of Year FY 2014 (October 1, 2013 - September 30, 2014)**

| Region / State | % in Significant Operational Compliance with Release Prevention Regulations | % in Significant Operational Compliance with Release Detection Regulations | % of UST Facilities in SOC w/UST Release Detection and Release Prevention |
|-----------------|---|--|---|
| ONE | | | |
| CT ¹ | 76% | 73% | 64% |
| MA | 83% | 29% | 29% |
| ME | 82% | 75% | 63% |
| NH | 66% | 69% | 46% |
| RI ¹ | 77% | 75% | 67% |
| VT ¹ | 87% | 85% | 82% |
| SUBTOTAL | 79% | 57% | 50% |
| TWO | | | |
| NJ | 95% | 96% | 92% |
| NY | 84% | 73% | 69% |
| PR | 64% | 63% | 54% |
| VI | 100% | 75% | 75% |
| SUBTOTAL | 85% | 80% | 75% |
| THREE | | | |
| DC | 87% | 87% | 78% |
| DE | 93% | 96% | 91% |
| MD | 78% | 90% | 72% |
| PA | 92% | 88% | 83% |
| VA | 86% | 76% | 70% |
| WV | 86% | 85% | 76% |
| SUBTOTAL | 87% | 84% | 77% |

| Region / State | % in Significant Operational Compliance with Release Prevention Regulations | % in Significant Operational Compliance with Release Detection Regulations | % of UST Facilities in SOC w/UST Release Detection and Release Prevention |
|-----------------|---|--|---|
| FOUR | | | |
| AL | 90% | 80% | 73% |
| FL | 98% | 78% | 77% |
| GA | 78% | 73% | 67% |
| KY | 75% | 76% | 62% |
| MS | 74% | 69% | 58% |
| NC | 76% | 72% | 65% |
| SC | 85% | 83% | 74% |
| TN | 90% | 89% | 83% |
| SUBTOTAL | 84% | 77% | 70% |
| FIVE | | | |
| IL ¹ | 76% | 70% | 63% |
| IN | 86% | 92% | 82% |
| MI ¹ | 85% | 64% | 59% |
| MN | 81% | 82% | 75% |
| OH | 90% | 72% | 68% |
| WI ¹ | 91% | 87% | 81% |
| SUBTOTAL | 85% | 76% | 70% |
| SIX | | | |
| AR | 71% | 74% | 59% |
| LA | 81% | 81% | 72% |
| NM | 80% | 83% | 71% |
| OK | 77% | 89% | 71% |
| TX | 95% | 92% | 90% |
| SUBTOTAL | 88% | 88% | 81% |

These compliance rates indicate the percent of recently-inspected facilities in significant operational compliance (SOC) with federal UST requirements from 10/1/13 through 9/30/14. According to EPA guidelines, states are allowed to report based on requirements more stringent than the federal SOC requirements. States identified with footnote¹ indicated they had done so, as described on pages 9 and 10. Furthermore, states have different approaches to targeting inspections. For example, some states focus inspections on suspected non-compliant facilities, while other states conduct random inspections.

¹ States reporting based on requirements more stringent than the federal SOC requirements.

**UST Compliance Measures
for End of Year FY 2014 (October 1, 2013 - September 30, 2014)**

| Region / State | % in Significant Operational Compliance with Release Prevention Regulations | % in Significant Operational Compliance with Release Detection Regulations | % of UST Facilities in SOC w/UST Release Detection and Release Prevention |
|-----------------|---|--|---|
| SEVEN | | | |
| IA | 82% | 76% | 73% |
| KS ¹ | 59% | 91% | 56% |
| MO ¹ | 84% | 97% | 81% |
| NE | 80% | 69% | 59% |
| SUBTOTAL | 77% | 84% | 68% |
| EIGHT | | | |
| CO | 76% | 73% | 72% |
| MT | 95% | 93% | 89% |
| ND | 92% | 93% | 89% |
| SD | 73% | 81% | 64% |
| UT | 93% | 91% | 86% |
| WY | 98% | 93% | 91% |
| SUBTOTAL | 85% | 84% | 79% |
| NINE | | | |
| AS | 100% | 100% | 100% |
| AZ | 95% | 98% | 87% |
| CA | 86% | 75% | 68% |
| GU | 100% | 95% | 95% |
| HI | 99% | 98% | 98% |
| MP | 100% | 89% | 89% |
| NV | 90% | 89% | 83% |
| SUBTOTAL | 88% | 80% | 73% |

| Region / State | % in Significant Operational Compliance with Release Prevention Regulations | % in Significant Operational Compliance with Release Detection Regulations | % of UST Facilities in SOC w/UST Release Detection and Release Prevention |
|-----------------------|---|--|---|
| TEN | | | |
| AK | 81% | 82% | 73% |
| ID ¹ | 81% | 72% | 56% |
| OR | 91% | 92% | 86% |
| WA | 84% | 81% | 71% |
| SUBTOTAL | 85% | 82% | 73% |
| INDIAN COUNTRY | | | |
| REGION 1 | DNA ² | DNA ² | DNA ² |
| REGION 2 | 83% | 63% | 63% |
| REGION 3 | N/A ³ | N/A ³ | N/A ³ |
| REGION 4 | 70% | 66% | 50% |
| REGION 5 | 83% | 67% | 55% |
| REGION 6 | 95% | 98% | 93% |
| REGION 7 | 0% | 0% | 0% |
| REGION 8 | 58% | 62% | 53% |
| REGION 9 | 86% | 81% | 72% |
| REGION 10 | 88% | 94% | 81% |
| SUBTOTAL | 80% | 77% | 68% |
| NATIONAL TOTAL | | | |
| TOTAL | 84.9% | 79.6% | 72.5% |

These compliance rates indicate the percentage of recently-inspected facilities in significant operational compliance (SOC) with federal UST requirements from 10/1/13 through 9/30/14. According to EPA guidelines, states are allowed to report based on requirements more stringent than the federal SOC requirements. States identified with footnote1 indicated they had done so, as described on pages 9 and 10. Furthermore, states have different approaches to targeting inspections. For example, some states focus inspections on suspected non-compliant facilities, while other states conduct random inspections.

¹ States reporting based on requirements more stringent than the federal SOC requirements.

² DNA = Data Not Available.

³ N/A = Not Applicable. EPA Region 3 does not have any federally recognized tribes.

States With Requirements More Stringent Than The Federal Significant Operational Compliance Requirements

CONNECTICUT

Release Prevention: Operation and Maintenance of Cathodic Protection

- Lining not allowed.

Release Detection: Testing

- Tanks and piping require weekly and monthly monitoring for releases and records must be available (for 2 of the most recent consecutive months and for 8 of the last 12 months).
- Statistical Inventory Reconciliation (SIR) not allowed as a stand-alone method.

IDAHO

Release Prevention: Operation and Maintenance of Cathodic Protection

- Three 60-day rectifier inspection checks are required.
- Two three-year system checks are required for impressed current and galvanic.

Release Detection: Testing

- Records required for the past 12 months.

Other

- Percent of UST facilities in compliance with both release detection and release prevention also factors in financial responsibility and EPAAct requirements, such as operator training and secondary containment.

ILLINOIS

Release Detection: Testing

- Owner/operator must produce records within 30 minutes of arrival of inspector.

KANSAS

Release Prevention: Spill Prevention

- Owners/operators cannot have debris or water in the spill bucket.

Release Prevention: Cathodic Protection

- Owner/operator must ensure that the cathodic protection rectifier log is available at the time of inspection.

MICHIGAN

Release Detection: Required Methods

- Owners/operators must have inventory control plus another method of release detection.

MISSOURI

Release Prevention: Cathodic Protection

- All metal components in contact with any electrolyte must be cathodically protected.

RHODE ISLAND

Release Prevention: Operation and Maintenance

- All tanks and piping are required to be tightness tested after a repair. No exemptions.

Release Prevention: Operation and Maintenance of Cathodic Protection

- Impressed current cathodic protection systems are required to be tested every 2 years.
- Sacrificial anode systems are required to be tested every 3 years.

Release Detection: Testing

- Records required for the past 36 months.
- Inventory control is required for all tanks (single-walled and double-walled).
- The automatic tank gauge (ATG) has to be checked monthly and have an annual test conducted.
- Tightness testing schedule is different than the federal requirement; it depends on the type of tank.
 - o Tank tightness must be performed on all single walled tanks.
 - o Tightness tests must be performed every 5 years after the installation of the ATG until the tank has been installed for 20 years and every 2 years thereafter.

- o UST systems upgraded with interior lining and/or cathodic protections are not required to have an ATG for 10 years after the upgrade. Tank tightness testing must be conducted annually during these 10 years. After 10 years, an ATG is required and tank tightness testing must be performed every 5 years until the tank has been installed for 20 years and then every 2 years thereafter. The results of all tightness tests shall be maintained for 3 years beyond the life of the facility.
- Groundwater or vapor monitoring not accepted as a method of leak detection.
- SIR not accepted.

VERMONT

Release Prevention: Operation and Maintenance of Cathodic Protection

- Lining not allowed unless with impressed current.

Release Detection: Method Presence and Performance Requirements

- Weekly monitoring required for tank and piping. Records must be available for the two most recent consecutive months and for 8 of the last 12 months.

Release Detection: Testing

- Inventory control /Tank Tightness Testing (TTT) not allowed as a release detection method after 6/30/98.
- Manual Tank Gauge (MTG) allowed alone up to 550 gallons; 551-1,000 gallons, MTG with annual TTT.

WISCONSIN

Release Prevention: Operation and Maintenance of Cathodic Protection

- Require annual cathodic protection test.

Release Prevention: Spill Prevention

- Require USTs to be equipped with overfill prevention equipment that will operate as follows (NFPA 30-2.6.1.4 – 2000 and 2003 version):
 - o Automatically shut off the flow of liquid into the tank when the tank is no more than 95% full;
 - o Alert the transfer operator when the tank is no more than 90% full by restricting the flow of liquid into the tank or triggering the high-level alarm; and,
 - o Other methods approved by the authority having jurisdiction.

Release Detection: Testing

- Require NFPA 30A09.2.1 (2000 and 2003 versions). Accurate daily inventory records shall be maintained and reconciled for all liquid fuel storage tanks for indication of possible leakage from tanks or piping. The records shall be kept on the premises or shall be made available to the authority having jurisdiction for the inspection within 24 hours of a written or verbal request. The records shall include, as a minimum and by product, daily reconciliation between sales, use, receipts, and inventory on hand. If there is more than one storage system serving an individual pump or dispensing device for any product, the reconciliation shall be maintained separately for each system.

Release Detection: Deferment

- No exclusion or deferment for "remote" emergency generator tanks.

Other

- Require annual permit to operate that includes verification of financial responsibility.

**Inspection/Delivery Prohibition Actions
for End of Year FY 2014 (October 1, 2013 - September 30, 2014)**

| Region / State | Number of On-Site Inspections Conducted | Number of Delivery Prohibition Actions |
|-----------------|---|--|
| ONE | | |
| CT | 1,137 | 17 |
| MA | 677 | 0 |
| ME | 1,228 | 0 |
| NH | 381 | 12 |
| RI | 382 | 0 |
| VT | 349 | 3 |
| SUBTOTAL | 4,154 | 32 |
| TWO | | |
| NJ | 1,242 | 176 |
| NY | 2,947 | 0 |
| PR | 490 | 0 |
| VI | 24 | 0 |
| SUBTOTAL | 4,703 | 176 |
| THREE | | |
| DC | 89 | 0 |
| DE | 158 | 1 |
| MD | 1,111 | 15 |
| PA | 2,835 | 38 |
| VA | 2,033 | 3 |
| WV | 742 | 8 |
| SUBTOTAL | 6,968 | 65 |

| Region / State | Number of On-Site Inspections Conducted | Number of Delivery Prohibition Actions |
|-----------------|---|--|
| FOUR | | |
| AL | 2,998 | 230 |
| FL | 4,766 | 0 |
| GA | 3,145 | 480 |
| KY | 2,172 | 146 |
| MS | 1,036 | 70 |
| NC | 3,552 | 157 |
| SC | 3,685 | 472 |
| TN | 2,923 | 182 |
| SUBTOTAL | 24,277 | 1,737 |
| FIVE | | |
| IL | 3,445 | 752 |
| IN | 1,604 | 1 |
| MI | 2,563 | 209 |
| MN | 1,469 | 10 |
| OH | 2,786 | 0 |
| WI | 4,553 | 244 |
| SUBTOTAL | 16,420 | 1,216 |
| SIX | | |
| AR | 1,123 | 55 |
| LA | 1,451 | 10 |
| NM | 625 | 3 |
| OK | 3,448 | 68 |
| TX | 3,135 | 5,544 |
| SUBTOTAL | 9,782 | 5,680 |

Not all states fully implement delivery prohibition at this time, and some states prohibit deliveries primarily for registration violations.

**Inspection/Delivery Prohibition Actions
for End of Year FY 2014 (October 1, 2013 - September 30, 2014)**

| Region / State | Number of On-Site Inspections Conducted | Number of Delivery Prohibition Actions |
|-----------------|---|--|
| SEVEN | | |
| IA | 585 | 83 |
| KS | 1,143 | 39 |
| MO | 1,416 | 0 |
| NE | 913 | 0 |
| SUBTOTAL | 4,057 | 122 |
| EIGHT | | |
| CO | 1,541 | 59 |
| MT | 395 | 4 |
| ND | 270 | 0 |
| SD | 422 | 0 |
| UT | 1,011 | 27 |
| WY | 386 | 2 |
| SUBTOTAL | 4,025 | 92 |
| NINE | | |
| AS | 4 | 0 |
| AZ | 876 | 2 |
| CA | 13,274 | 91 |
| GU | 72 | 0 |
| HI | 379 | 0 |
| MP | 25 | 0 |
| NV | 994 | 5 |
| SUBTOTAL | 15,624 | 98 |

| Region / State | Number of On-Site Inspections Conducted | Number of Delivery Prohibition Actions |
|-----------------------|---|--|
| TEN | | |
| AK | 192 | 17 |
| ID | 423 | 0 |
| OR | 569 | 69 |
| WA | 1,330 | 7 |
| SUBTOTAL | 2,514 | 93 |
| INDIAN COUNTRY | | |
| REGION 1 | 0 | 0 |
| REGION 2 | 8 | 0 |
| REGION 3 | N/A ¹ | N/A ¹ |
| REGION 4 | 10 | 0 |
| REGION 5 | 78 | 0 |
| REGION 6 | 40 | 0 |
| REGION 7 | 1 | 0 |
| REGION 8 | 79 | 0 |
| REGION 9 | 74 | 0 |
| REGION 10 | 69 | 0 |
| SUBTOTAL | 359 | 0 |
| NATIONAL TOTAL | | |
| TOTAL | 92,883 | 9,311 |

Not all states fully implement delivery prohibition at this time, and some states prohibit deliveries primarily for registration violations.

¹ N/A = Not Applicable. EPA Region 3 does not have any federally recognized tribes.