

## **Semiannual Report Of UST Performance Measures Mid Fiscal Year 2017 (October 1, 2016 - March 31, 2017)**

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### **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. These data include 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/ust/ust-performance-measures](http://www.epa.gov/ust/ust-performance-measures) under **Definitions**.

### **What is in the mid fiscal year (FY) 2017 report?**

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### **How does the UST program's performance at mid FY 2017 compare with its FY 2017 goals and mid FY 2016 performance?**

<b>Mid FY 2017 UST Program Performance</b>	<b>Compare With FY 2017 UST Program Goal</b>	<b>Compare With Mid FY 2016 UST Program Performance</b>
Completed 4,106 cleanups (including 9 in Indian country)	Complete 8,600 or more cleanups, including 26 or more in Indian country	At mid FY 2016, completed 4,597 cleanups (including 11 in Indian country)
72.9 percent significant operational compliance rate	Achieve a significant operational compliance rate of 71.5 percent or higher	At mid FY 2016, the significant operational compliance rate was 73.1 percent
Confirmed 2,854 releases	Decrease newly-confirmed releases to fewer than 6,285	At mid FY 2016, confirmed 2,591 releases
13 percent of confirmed releases at UST facilities remaining to be cleaned up	Reduce to 12 percent or less the percent of confirmed releases at UST facilities remaining to be cleaned up	At mid FY 2016, reduced to 13.6 percent the percent of confirmed releases at UST facilities remaining to be cleaned up

## What other highlights are included in the mid FY 2017 report?

- There are 558,451 active USTs (at approximately 201,000 sites) which are regulated by EPA's UST program
- Since the 1984 inception of the UST program, 1,840,144 USTs have been properly closed
- 43,211 on-site inspections at federally-regulated UST facilities were conducted between October 2016 and March 2017; of those:
  - 43,142 were conducted by states, territories, and third-party inspectors
  - 69 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 since 2000.

For this reporting period, of the 535,320 releases reported since the beginning of the UST program, 465,226—or 87 percent—have been cleaned up. That means 70,094—or 13 percent of—confirmed releases at UST facilities remain to be cleaned up. Our data show EPA, states, territories, tribes, and other UST partners are making continued progress in reducing the percent of confirmed releases at UST facilities remaining to be cleaned up.

## Where can I find performance data from previous years?

EPA's website [www.epa.gov/ust/ust-performance-measures](http://www.epa.gov/ust/ust-performance-measures) provides the most current report, as well as historical reports beginning with FY 1988, the first year EPA reported UST data. Reports are listed beginning with the most recent first.

**For more information**, contact Susan Burnell at [burnell.susan@epa.gov](mailto:burnell.susan@epa.gov) or 202-564-0766 of EPA's Office of Underground Storage Tanks.

**UST Corrective Action Measures for Mid-Year FY 2017 (Data through March 31, 2017)**

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
<b>ONE</b>								
CT	5,946	27,528	39	3,309	3,259	27	2,334	975
MA	9,101	26,298	34	6,505	6,475	47	5,958	547
ME	2,539	13,709	29	2,873	2,843	27	2,845	28
NH	2,725	12,500	14	2,667	2,667	2	2,055	612
RI	1,475	8,748	7	1,413	1,413	7	1,256	157
VT	1,873	6,272	5	2,168	2,166	18	1,524	644
<b>Subtotal</b>	<b>23,659</b>	<b>95,055</b>	<b>128</b>	<b>18,935</b>	<b>18,823</b>	<b>128</b>	<b>15,972</b>	<b>2,963</b>
<b>TWO</b>								
NJ	13,438	60,279	616	16,839	14,736	290	11,739	5,100
NY	23,116	98,867	47	29,782	29,728	106	28,790	992
PR	4,482	5,813	1	1,075	842	2	519	556
VI	140	282	2	32	34	1	26	6
<b>Subtotal</b>	<b>41,176</b>	<b>165,241</b>	<b>666</b>	<b>47,728</b>	<b>45,340</b>	<b>399</b>	<b>41,074</b>	<b>6,654</b>
<b>THREE</b>								
DC	613	3,421	6	954	939	1	855	99
DE	1,152	7,503	23	2,850	2,808	22	2,771	79
MD	7,425	36,484	56	12,385	12,211	40	12,169	216
PA	22,383	67,033	105	17,214	17,150	163	15,450	1,764
VA	18,106	62,938	60	12,379	12,278	75	12,085	294
WV	4,346	21,236	21	3,657	3,575	29	3,034	623
<b>Subtotal</b>	<b>54,025</b>	<b>198,615</b>	<b>271</b>	<b>49,439</b>	<b>48,961</b>	<b>330</b>	<b>46,364</b>	<b>3,075</b>

Definition of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at <https://www.epa.gov/sites/production/files/2015-03/documents/pmdefinitions.pdf>

**UST Corrective Action Measures for Mid-Year FY 2017 (Data through March 31, 2017)**

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
<b>FOUR</b>								
AL	16,494	30,865	37	12,025	11,894	54	10,900	1,125
FL	22,543	112,447	63	27,165	20,457	387	16,744	10,421
GA	29,127	51,034	143	14,073	13,880	161	13,051	1,022
KY	9,586	40,802	114	16,880	16,872	163	16,164	716
MS	8,175	23,949	55	7,884	7,697	47	7,457	427
NC	24,818	70,916	74	26,294	23,672	189	22,288	4,006
SC	11,460	33,971	62	10,043	9,853	67	7,792	2,251
TN	16,281	40,820	79	15,216	15,216	83	14,976	240
<b>Subtotal</b>	<b>138,484</b>	<b>404,804</b>	<b>627</b>	<b>129,580</b>	<b>119,541</b>	<b>1,151</b>	<b>109,372</b>	<b>20,208</b>
<b>FIVE</b>								
IL	18,966	64,182	124	25,104	24,149	201	19,371	5,733
IN	13,386	43,122	83	10,042	9,403	75	8,504	1,538
MI	17,647	71,748	51	22,936	22,540	162	14,936	8,000
MN	12,653	33,556	60	11,647	11,496	71	11,323	324
OH	21,456	48,506	168	31,612	31,172	257	29,882	1,730
WI	13,624	70,078	36	19,527	19,325	64	18,576	951
<b>Subtotal</b>	<b>97,732</b>	<b>331,192</b>	<b>522</b>	<b>120,868</b>	<b>118,085</b>	<b>830</b>	<b>102,592</b>	<b>18,276</b>

Definition of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at <https://www.epa.gov/sites/production/files/2015-03/documents/pmdefinitions.pdf>

**UST Corrective Action Measures for Mid-Year FY 2017 (Data through March 31, 2017)**

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
<b>SIX</b>								
AR	8,698	21,879	13	1,799	1,521	17	1,521	278
LA	10,769	35,910	60	5,293	5,293	57	4,624	669
NM	3,634	13,011	8	2,647	2,344	8	1,808	839
OK	9,643	28,713	39	5,297	5,297	54	4,942	355
TX	50,420	122,810	142	27,810	26,914	205	26,319	1,491
<b>Subtotal</b>	<b>83,164</b>	<b>222,323</b>	<b>262</b>	<b>42,846</b>	<b>41,369</b>	<b>341</b>	<b>39,214</b>	<b>3,632</b>
<b>SEVEN</b>								
IA	6,613	23,630	20	6,199	6,045	63	5,541	658
KS	6,452	21,395	15	5,255	5,120	18	3,945	1,310
MO	8,837	32,467	48	7,160	7,143	78	6,365	795
NE	6,421	15,319	37	6,574	5,777	110	5,520	1,054
<b>Subtotal</b>	<b>28,323</b>	<b>92,811</b>	<b>120</b>	<b>25,188</b>	<b>24,085</b>	<b>269</b>	<b>21,371</b>	<b>3,817</b>
<b>EIGHT</b>								
CO	7,175	23,466	57	8,414	8,036	90	7,864	550
MT	3,191	11,901	8	3,070	2,944	32	2,298	772
ND	2,270	7,616	0	887	866	0	842	45
SD	3,073	7,169	6	2,776	2,630	23	2,656	120
UT	3,689	14,036	32	4,995	4,956	47	4,681	314
WY	1,661	8,203	10	2,684	2,727	19	1,986	698
<b>Subtotal</b>	<b>21,059</b>	<b>72,391</b>	<b>113</b>	<b>22,826</b>	<b>22,159</b>	<b>211</b>	<b>20,327</b>	<b>2,499</b>

Definition of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at <https://www.epa.gov/sites/production/files/2015-03/documents/pmdefinitions.pdf>

**UST Corrective Action Measures for Mid-Year FY 2017 (Data through March 31, 2017)**

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
<b>NINE</b>								
AS	5	63	0	8	7	0	7	1
AZ	6,319	22,318	32	8,971	8,300	72	8,256	715
CA	36,462	132,817	31	44,208	42,864	250	40,391	3,817
GU	237	493	2	142	142	0	120	22
HI	1,512	5,605	9	2,128	2,077	8	1,984	144
MP	64	72	0	15	15	0	14	1
NV	3,772	7,640	2	2,560	2,560	3	2,403	157
<b>Subtotal</b>	<b>48,371</b>	<b>169,008</b>	<b>76</b>	<b>58,032</b>	<b>55,965</b>	<b>333</b>	<b>53,175</b>	<b>4,857</b>
<b>TEN</b>								
AK	944	6,823	11	2,452	2,419	14	2,147	305
ID	3,382	11,383	3	1,509	1,483	12	1,434	75
OR	5,494	26,722	41	7,572	7,380	47	6,739	833
WA	10,001	37,453	11	6,934	6,546	32	4,300	2,634
<b>Subtotal</b>	<b>19,821</b>	<b>82,381</b>	<b>66</b>	<b>18,467</b>	<b>17,828</b>	<b>105</b>	<b>14,620</b>	<b>3,847</b>

Definition of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at <https://www.epa.gov/sites/production/files/2015-03/documents/pmdefinitions.pdf>

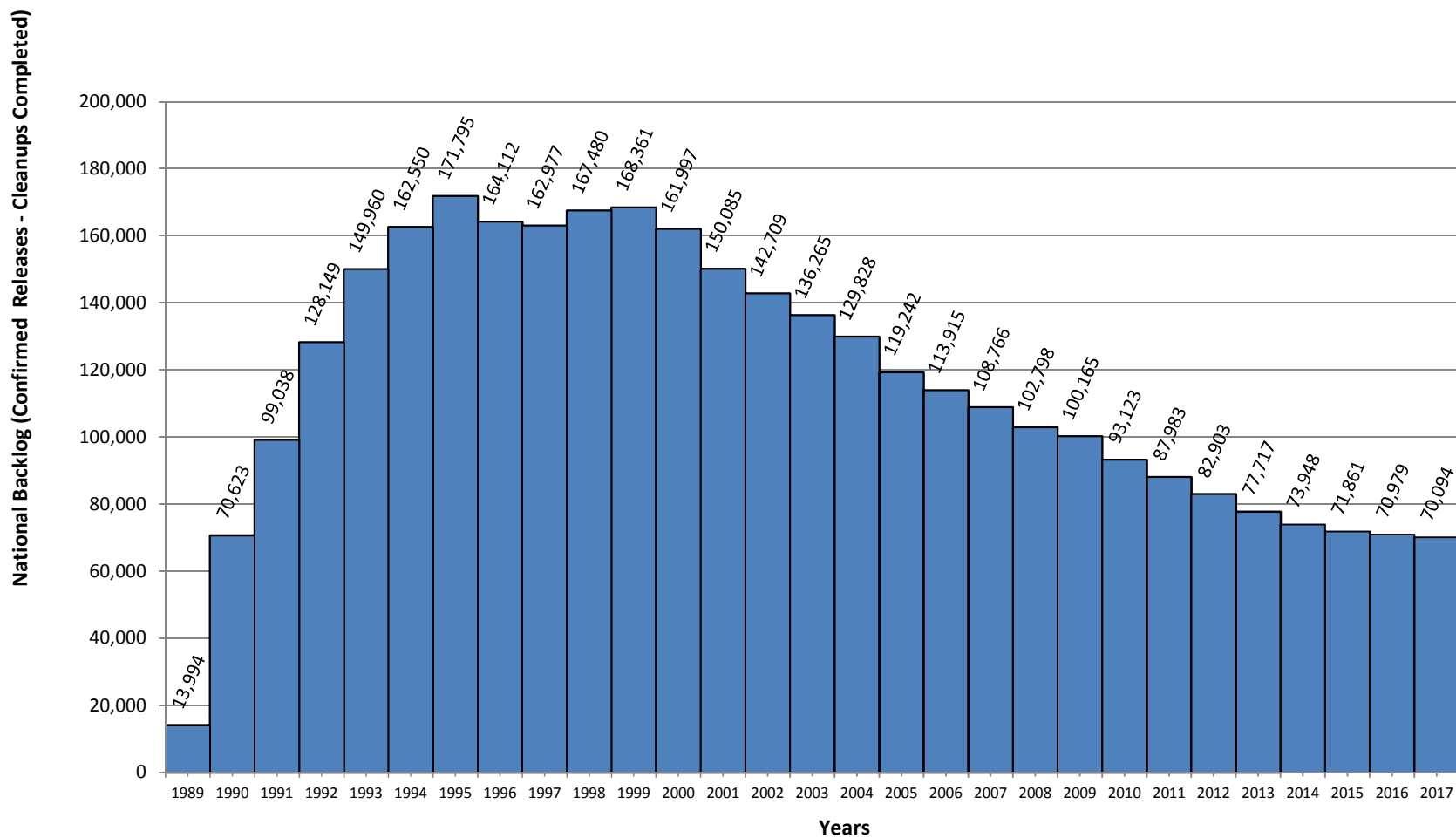
**UST Corrective Action Measures for Mid-Year FY 2017 (Data through March 31, 2017)**

Region / State	Active Tanks	Closed Tanks	Confirmed Releases		Cleanups Initiated	Cleanups Completed		Cleanups Remaining
			Actions This Year	Cumulative		Actions This Year	Cumulative	
<b>REGIONAL CORRECTIVE ACTIONS FOR INDIAN COUNTRY</b>								
REGION 1	13	6	0	1	1	0	1	0
REGION 2	170	28	0	7	7	0	6	1
REGION 3	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>
REGION 4	68	77	0	16	16	0	10	6
REGION 5	447	1,052	0	252	227	1	181	71
REGION 6	379	315	1	68	68	0	65	3
REGION 7	80	96	0	22	22	0	13	9
REGION 8	527	2,125	1	546	539	3	430	116
REGION 9	559	1,476	1	308	254	4	254	54
REGION 10	394	1,148	0	191	191	1	185	6
<b>SUBTOTAL</b>	<b>2,637</b>	<b>6,323</b>	<b>3</b>	<b>1,411</b>	<b>1,325</b>	<b>9</b>	<b>1,145</b>	<b>266</b>
	<b>Active Tanks</b>	<b>Closed Tanks</b>	<b>Confirmed Releases</b>		<b>Cleanups Initiated</b>	<b>Cleanups Completed</b>		<b>Cleanups Remaining</b>
			<b>Actions This Year</b>	<b>Cumulative</b>		<b>Actions This Year</b>	<b>Cumulative</b>	
<b>NATIONAL TOTAL</b>	<b>558,451</b>	<b>1,840,144</b>	<b>2,854</b>	<b>535,320</b>	<b>513,481</b>	<b>4,106</b>	<b>465,226</b>	<b>70,094</b>

Definitions of confirmed releases, cleanups initiated, and cleanups completed are on EPA's website at <https://www.epa.gov/sites/production/files/2015-03/documents/pmdefinitions.pdf>

<sup>1</sup> N/A = Not Applicable. There are no tribal USTs in EPA Region 3.

# UST National Backlog: FY 1989 Through Mid-Year FY 2017





**UST Compliance Measures for Mid-Year FY 2017  
(April 1, 2016 - March 31, 2017)**

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
<b>ONE</b>			
CT <sup>1</sup>	92%	91%	86%
MA	48%	65%	40%
ME	89%	79%	69%
NH	60%	53%	39%
RI <sup>1</sup>	68%	64%	55%
VT <sup>1</sup>	86%	83%	82%
<b>SUBTOTAL</b>	<b>69%</b>	<b>73%</b>	<b>59%</b>
<b>TWO</b>			
NJ	95%	96%	93%
NY	88%	75%	71%
PR	73%	72%	72%
VI	96%	77%	74%
<b>SUBTOTAL</b>	<b>89%</b>	<b>81%</b>	<b>78%</b>
<b>THREE</b>			
DC	90%	89%	83%
DE	99%	98%	97%
MD	86%	91%	81%
PA	81%	82%	70%
VA	86%	76%	69%
WV	90%	86%	80%
<b>SUBTOTAL</b>	<b>85%</b>	<b>82%</b>	<b>73%</b>

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
<b>FOUR</b>			
AL	89%	77%	70%
FL	98%	76%	75%
GA	80%	74%	67%
KY	77%	82%	68%
MS	78%	71%	62%
NC	76%	69%	62%
SC	75%	78%	63%
TN	88%	86%	75%
<b>SUBTOTAL</b>	<b>83%</b>	<b>76%</b>	<b>68%</b>
<b>FIVE</b>			
IL <sup>1</sup>	74%	68%	61%
IN	92%	93%	90%
MI <sup>1</sup>	87%	74%	69%
MN	86%	86%	81%
OH	92%	73%	70%
WI <sup>1</sup>	91%	86%	80%
<b>SUBTOTAL</b>	<b>87%</b>	<b>78%</b>	<b>74%</b>
<b>SIX</b>			
AR	70%	73%	59%
LA	84%	85%	76%
NM	88%	84%	76%
OK	76%	86%	72%
TX	93%	93%	89%
<b>SUBTOTAL</b>	<b>87%</b>	<b>89%</b>	<b>82%</b>

These compliance rates indicate the percent of recently-inspected facilities in significant operational compliance (SOC) with federal UST requirements from 4/1/16 through 3/31/17. According to EPA guidelines, states are allowed to report based on requirements more stringent than the federal SOC requirements. States identified with footnote<sup>1</sup> 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.

<sup>1</sup> States reporting based on requirements more stringent than the federal SOC requirements.

**UST Compliance Measures for Mid-Year FY 2017  
(April 1, 2016 - March 31, 2017)**

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
<b>SEVEN</b>			
IA	81%	83%	71%
KS	56%	88%	51%
MO <sup>1</sup>	81%	95%	77%
NE <sup>1</sup>	75%	69%	59%
<b>SUBTOTAL</b>	<b>74%</b>	<b>85%</b>	<b>65%</b>
<b>EIGHT</b>			
CO	87%	89%	83%
MT	95%	92%	87%
ND	91%	94%	89%
SD	80%	79%	65%
UT	91%	89%	82%
WY	100%	98%	97%
<b>SUBTOTAL</b>	<b>89%</b>	<b>89%</b>	<b>83%</b>
<b>NINE</b>			
AS	100%	67%	67%
AZ	93%	87%	85%
CA	83%	75%	65%
GU	92%	90%	90%
HI	99%	94%	94%
MP	81%	90%	76%
NV	92%	89%	84%
<b>SUBTOTAL</b>	<b>86%</b>	<b>78%</b>	<b>70%</b>

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
<b>TEN</b>			
AK	82%	82%	76%
ID <sup>1</sup>	89%	81%	70%
OR	90%	92%	86%
WA	89%	88%	81%
<b>SUBTOTAL</b>	<b>89%</b>	<b>88%</b>	<b>80%</b>
<b>INDIAN COUNTRY</b>			
REGION 1	100%	75%	75%
REGION 2	61%	61%	61%
REGION 3	N/A <sup>3</sup>	N/A <sup>3</sup>	N/A <sup>3</sup>
REGION 4	DNA <sup>2</sup>	DNA <sup>2</sup>	DNA <sup>2</sup>
REGION 5	71%	59%	50%
REGION 6	96%	98%	94%
REGION 7	10%	20%	10%
REGION 8	83%	86%	72%
REGION 9	97%	84%	82%
REGION 10	81%	69%	60%
<b>SUBTOTAL</b>	<b>82%</b>	<b>76%</b>	<b>69%</b>
<b>NATIONAL TOTAL</b>			
<b>TOTAL</b>	<b>84.6%</b>	<b>80.7%</b>	<b>72.9%</b>

These compliance rates indicate the percentage of recently-inspected facilities in significant operational compliance (SOC) with federal UST requirements from 4/1/16 through 3/31/17. 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.

<sup>1</sup> States reporting based on requirements more stringent than the federal SOC requirements.

<sup>2</sup> DNA = Data Not Available.

<sup>3</sup> N/A = Not Applicable. There are no tribal USTs in EPA Region 3.

## **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 EPCRA requirements, such as operator training and secondary containment.

### **ILLINOIS**

#### **Release Detection: Testing**

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

### **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.

### **NEBRASKA**

#### **Release Prevention: Cathodic Protection**

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

#### **Release Prevention: Reporting**

- Owner/operator must submit monthly inventory monitoring reports to the state.

#### **Release Prevention: Temporarily Closed Tanks**

- Owner/operator must permanently close USTs that have been in temporary closed status for more than one year.

### **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.

#### **Release Detection: Monitoring and Testing**

- Records required for the past 36 months.
- Inventory control is required for all tanks (single-walled and double-walled).
- Tightness testing schedule is different than the federal requirement; it depends on the type of tank.
  - Tank tightness must be performed on all single walled tanks.
  - 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.

- Single-walled USTs installed for a period of 30 years have to be tightness tested annually beginning in 2015.
- 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.
- Tightness testing of UST and piping interstitial spaces is required when a system has been installed for a period of 20 years, and every 2 years thereafter.
- 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):
  - Automatically shut off the flow of liquid into the tank when the tank is no more than 95% full;
  - 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,
  - 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 Mid-Year FY 2017 (October 1, 2016 - March 31, 2017)**

Region / State	Number of On-Site Inspections Conducted	Number of Delivery Prohibition Actions
<b>ONE</b>		
CT	577	25
MA	284	0
ME	339	0
NH	90	0
RI	135	0
VT	96	1
<b>SUBTOTAL</b>	<b>1,521</b>	<b>26</b>
<b>TWO</b>		
NJ	602	59
NY	940	0
PR	486	0
VI	12	0
<b>SUBTOTAL</b>	<b>2,040</b>	<b>59</b>
<b>THREE</b>		
DC	33	0
DE	58	2
MD	590	4
PA	1,182	34
VA	823	0
WV	265	2
<b>SUBTOTAL</b>	<b>2,951</b>	<b>42</b>

Region / State	Number of On-Site Inspections Conducted	Number of Delivery Prohibition Actions
<b>FOUR</b>		
AL	1,243	95
FL	2,991	0
GA	1,241	0
KY	942	35
MS	461	89
NC	1,577	93
SC	1,816	233
TN	1,029	20
<b>SUBTOTAL</b>	<b>11,300</b>	<b>565</b>
<b>FIVE</b>		
IL	1,311	366
IN	829	0
MI	1,369	51
MN	374	10
OH	1,763	0
WI	995	63
<b>SUBTOTAL</b>	<b>6,641</b>	<b>490</b>
<b>SIX</b>		
AR	668	21
LA	874	7
NM	316	10
OK	1,372	65
TX	2,782	302
<b>SUBTOTAL</b>	<b>6,012</b>	<b>405</b>

States use different approaches to delivery prohibition. For example, certain states issue a notice of intent before actually issuing a delivery prohibition (i.e., some states forgo delivery prohibition issuance for facilities that come into compliance). In addition, some states prohibit deliveries primarily for registration violations.

**Inspection/Delivery Prohibition Actions  
for Mid-Year FY 2017 (October 1, 2016 - March 31, 2017)**

Region / State	Number of On-Site Inspections Conducted	Number of Delivery Prohibition Actions
<b>SEVEN</b>		
IA	934	1
KS	527	2
MO	846	3
NE	547	0
<b>SUBTOTAL</b>	<b>2,854</b>	<b>6</b>
<b>EIGHT</b>		
CO	751	6
MT	164	3
ND	9	0
SD	148	0
UT	311	0
WY	148	0
<b>SUBTOTAL</b>	<b>1,531</b>	<b>9</b>
<b>NINE</b>		
AS	0	0
AZ	587	13
CA	6,302	125
GU	6	0
HI	92	0
MP	9	0
NV	298	1
<b>SUBTOTAL</b>	<b>7,294</b>	<b>139</b>

Region / State	Number of On-Site Inspections Conducted	Number of Delivery Prohibition Actions
<b>TEN</b>		
AK	69	3
ID	134	0
OR	171	16
WA	624	0
<b>SUBTOTAL</b>	<b>998</b>	<b>19</b>
<b>INDIAN COUNTRY</b>		
REGION 1	0	
REGION 2	6	
REGION 3	N/A <sup>1</sup>	
REGION 4	0	
REGION 5	20	
REGION 6	11	
REGION 7	0	
REGION 8	0	
REGION 9	30	
REGION 10	2	
<b>SUBTOTAL</b>	<b>69</b>	
<b>NATIONAL TOTAL</b>		
<b>TOTAL</b>	<b>43,211</b>	<b>1,760</b>

States use different approaches to delivery prohibition. For example, certain states issue a notice of intent before actually issuing a delivery prohibition (i.e., some states forgo delivery prohibition issuance for facilities that come into compliance). In addition, some states prohibit deliveries primarily for registration violations.

<sup>1</sup> N/A = Not Applicable. There are no tribal USTs in EPA Region 3.