

Semiannual Report Of UST Performance Measures End Of Fiscal Year 2018 (October 1, 2017 – September 30, 2018)

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 under **Definitions**.

What is in the end of fiscal year (FY) 2018 report?

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What are the UST program's measures and national performance at end of FY 2018?

| UST Program Measures | National Performance |
|---|--|
| Active USTs regulated by EPA's UST program | 550,379 at approximately 199,000 sites |
| USTs properly closed since 1984 inception of the UST program | 1,871,148 |
| On-site inspections at federally-regulated UST facilities between October 2017 and September 2018 | 86,864 total <ul style="list-style-type: none"> • 86,483 conducted by states, territories, and third-party inspectors • 381 conducted by EPA and credentialed tribal inspectors in Indian Country |
| Significant operational compliance rate between October 2017 and September 2018 | 70.3% |
| Confirmed releases | 5,654 (includes 11 in Indian Country) <ul style="list-style-type: none"> • 543,812 cumulative |
| Cleanups completed | 8,128 (includes 16 in Indian Country) <ul style="list-style-type: none"> • 478,366 cumulative |
| Releases remaining to be cleaned up | 65,446 |

Where can I find performance data from previous years?

EPA's website 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 or 202-564-0766 of EPA's Office of Underground Storage Tanks.

UST Corrective Action Measures for End-of-Year FY 2018 (Data through September 30, 2018)

| Region / State | Active Tanks | Closed Tanks | Confirmed Releases | | Cleanups Initiated | Cleanups Completed | | Cleanups Remaining |
|-----------------|---------------|----------------|--------------------|---------------|--------------------|--------------------|---------------|--------------------|
| | | | Actions This Year | Cumulative | | Actions This Year | Cumulative | |
| ONE | | | | | | | | |
| CT | 5,619 | 28,049 | 106 | 3,475 | 3,391 | 60 | 2,450 | 1,025 |
| MA | 8,556 | 27,157 | 56 | 6,626 | 6,581 | 115 | 6,137 | 489 |
| ME | 2,367 | 14,024 | 85 | 3,000 | 2,970 | 77 | 2,959 | 41 |
| NH | 2,696 | 12,667 | 14 | 2,693 | 2,693 | 28 | 2,106 | 587 |
| RI | 1,348 | 8,960 | 33 | 1,455 | 1,455 | 16 | 1,290 | 165 |
| VT | 1,742 | 6,475 | 4 | 2,175 | 2,173 | 22 | 1,572 | 603 |
| Subtotal | 22,328 | 97,332 | 298 | 19,424 | 19,263 | 318 | 16,514 | 2,910 |
| TWO | | | | | | | | |
| NJ | 13,090 | 61,580 | 645 | 17,768 | 15,354 | 431 | 12,443 | 5,325 |
| NY | 22,139 | 108,345 | 221 | 30,174 | 30,125 | 265 | 29,258 | 916 |
| PR | 4,473 | 5,842 | 0 | 1,080 | 845 | 4 | 528 | 552 |
| VI | 134 | 289 | 1 | 37 | 37 | 1 | 30 | 7 |
| Subtotal | 39,836 | 176,056 | 867 | 49,059 | 46,361 | 701 | 42,259 | 6,800 |
| THREE | | | | | | | | |
| DC | 595 | 3,481 | 11 | 969 | 954 | 12 | 876 | 93 |
| DE | 1,161 | 7,576 | 38 | 2,902 | 2,861 | 48 | 2,831 | 71 |
| MD | 7,219 | 36,938 | 87 | 12,563 | 12,389 | 133 | 12,409 | 154 |
| PA | 22,083 | 67,949 | 220 | 17,532 | 17,490 | 216 | 15,845 | 1,687 |
| VA | 18,027 | 63,380 | 107 | 12,503 | 12,408 | 129 | 12,240 | 263 |
| WV | 4,211 | 21,470 | 31 | 3,705 | 3,619 | 87 | 3,177 | 528 |
| Subtotal | 53,296 | 200,794 | 494 | 50,174 | 49,721 | 625 | 47,378 | 2,796 |

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 End-of-Year FY 2018 (Data through September 30, 2018)

| Region / State | Active Tanks | Closed Tanks | Confirmed Releases | | Cleanups Initiated | Cleanups Completed | | Cleanups Remaining |
|-----------------|----------------|----------------|--------------------|----------------|--------------------|--------------------|----------------|--------------------|
| | | | Actions This Year | Cumulative | | Actions This Year | Cumulative | |
| FOUR | | | | | | | | |
| AL | 16,370 | 31,124 | 63 | 12,129 | 12,018 | 150 | 11,136 | 993 |
| FL | 22,664 | 113,053 | 246 | 27,429 | 21,396 | 867 | 18,097 | 9,332 |
| GA | 29,264 | 51,821 | 233 | 14,398 | 14,231 | 312 | 13,496 | 902 |
| KY | 9,498 | 41,100 | 109 | 17,047 | 17,036 | 162 | 16,411 | 636 |
| MS | 8,080 | 24,123 | 149 | 8,105 | 7,885 | 103 | 7,628 | 477 |
| NC | 24,386 | 71,684 | 237 | 26,659 | 24,035 | 399 | 22,955 | 3,704 |
| SC | 11,329 | 34,257 | 110 | 10,211 | 9,990 | 93 | 7,936 | 2,275 |
| TN | 16,059 | 41,416 | 186 | 15,473 | 15,472 | 240 | 15,333 | 140 |
| Subtotal | 137,650 | 408,578 | 1,333 | 131,451 | 122,063 | 2,326 | 112,992 | 18,459 |
| FIVE | | | | | | | | |
| IL | 18,454 | 63,458 | 266 | 25,488 | 24,465 | 431 | 20,061 | 5,427 |
| IN | 13,370 | 43,593 | 176 | 10,243 | 9,648 | 233 | 8,844 | 1,399 |
| MI | 17,630 | 72,100 | 246 | 23,321 | 22,823 | 218 | 15,237 | 8,084 |
| MN | 12,681 | 33,734 | 146 | 11,928 | 11,834 | 160 | 11,797 | 131 |
| OH | 21,087 | 51,818 | 415 | 32,250 | 31,680 | 486 | 30,637 | 1,613 |
| WI | 13,508 | 70,791 | 52 | 19,633 | 19,424 | 147 | 18,785 | 848 |
| Subtotal | 96,730 | 335,494 | 1,301 | 122,863 | 119,874 | 1,675 | 105,361 | 17,502 |

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 End-of-Year FY 2018 (Data through September 30, 2018)

| Region / State | Active Tanks | Closed Tanks | Confirmed Releases | | Cleanups Initiated | Cleanups Completed | | Cleanups Remaining |
|-----------------|---------------|----------------|--------------------|---------------|--------------------|--------------------|---------------|--------------------|
| | | | Actions This Year | Cumulative | | Actions This Year | Cumulative | |
| SIX | | | | | | | | |
| AR | 8,604 | 22,055 | 23 | 1,841 | 1,563 | 20 | 1,556 | 285 |
| LA | 10,565 | 36,317 | 96 | 5,503 | 5,503 | 158 | 4,891 | 612 |
| NM | 3,573 | 13,101 | 10 | 2,662 | 2,362 | 16 | 1,834 | 828 |
| OK | 9,081 | 29,402 | 118 | 5,457 | 5,457 | 84 | 5,080 | 377 |
| TX | 49,720 | 124,709 | 252 | 28,205 | 27,395 | 331 | 26,850 | 1,355 |
| Subtotal | 81,543 | 225,584 | 499 | 43,668 | 42,280 | 609 | 40,211 | 3,457 |
| SEVEN | | | | | | | | |
| IA | 6,416 | 24,023 | 27 | 6,249 | 6,130 | 91 | 5,740 | 509 |
| KS | 6,455 | 21,576 | 37 | 5,315 | 5,235 | 51 | 4,002 | 1,313 |
| MO | 8,685 | 32,890 | 83 | 7,284 | 7,276 | 117 | 6,557 | 727 |
| NE | 6,313 | 15,505 | 57 | 6,666 | 6,115 | 241 | 5,878 | 788 |
| Subtotal | 27,869 | 93,994 | 204 | 25,514 | 24,756 | 500 | 22,177 | 3,337 |
| EIGHT | | | | | | | | |
| CO | 7,156 | 23,752 | 206 | 8,705 | 8,290 | 235 | 8,222 | 483 |
| MT | 3,175 | 11,974 | 16 | 3,084 | 2,970 | 53 | 2,390 | 694 |
| ND | 2,223 | 7,691 | 3 | 896 | 875 | 4 | 860 | 36 |
| SD | 3,031 | 7,270 | 28 | 2,818 | 2,671 | 19 | 2,693 | 125 |
| UT | 3,603 | 14,113 | 67 | 5,111 | 5,053 | 116 | 4,829 | 282 |
| WY | 1,603 | 8,303 | 7 | 2,695 | 2,679 | 34 | 2,043 | 652 |
| Subtotal | 20,791 | 73,103 | 327 | 23,309 | 22,538 | 461 | 21,037 | 2,272 |

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 End-of-Year FY 2018 (Data through September 30, 2018)

| Region / State | Active Tanks | Closed Tanks | Confirmed Releases | | Cleanups Initiated | Cleanups Completed | | Cleanups Remaining |
|-----------------|---------------|----------------|--------------------|---------------|--------------------|--------------------|---------------|--------------------|
| | | | Actions This Year | Cumulative | | Actions This Year | Cumulative | |
| NINE | | | | | | | | |
| AS | 2 | 66 | 0 | 8 | 8 | 1 | 8 | 0 |
| AZ | 6,066 | 22,688 | 101 | 9,112 | 8,336 | 179 | 8,605 | 507 |
| CA | 36,224 | 134,113 | 67 | 44,272 | 43,269 | 488 | 41,144 | 3,128 |
| GU | 239 | 501 | 2 | 143 | 143 | 6 | 127 | 16 |
| HI | 1,522 | 5,642 | 21 | 2,153 | 2,084 | 31 | 2,024 | 129 |
| MP | 64 | 72 | 0 | 15 | 15 | 0 | 14 | 1 |
| NV | 3,803 | 7,744 | 9 | 2,578 | 2,578 | 28 | 2,451 | 127 |
| Subtotal | 47,920 | 170,826 | 200 | 58,281 | 56,433 | 733 | 54,373 | 3,908 |
| TEN | | | | | | | | |
| AK | 944 | 6,852 | 23 | 2,486 | 2,442 | 22 | 2,186 | 300 |
| ID | 3,389 | 11,498 | 14 | 1,526 | 1,500 | 16 | 1,466 | 60 |
| OR | 5,485 | 26,918 | 51 | 7,652 | 7,448 | 64 | 6,838 | 814 |
| WA | 9,941 | 37,671 | 32 | 6,981 | 6,738 | 62 | 4,408 | 2,573 |
| Subtotal | 19,759 | 82,939 | 120 | 18,645 | 18,128 | 164 | 14,898 | 3,747 |

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>

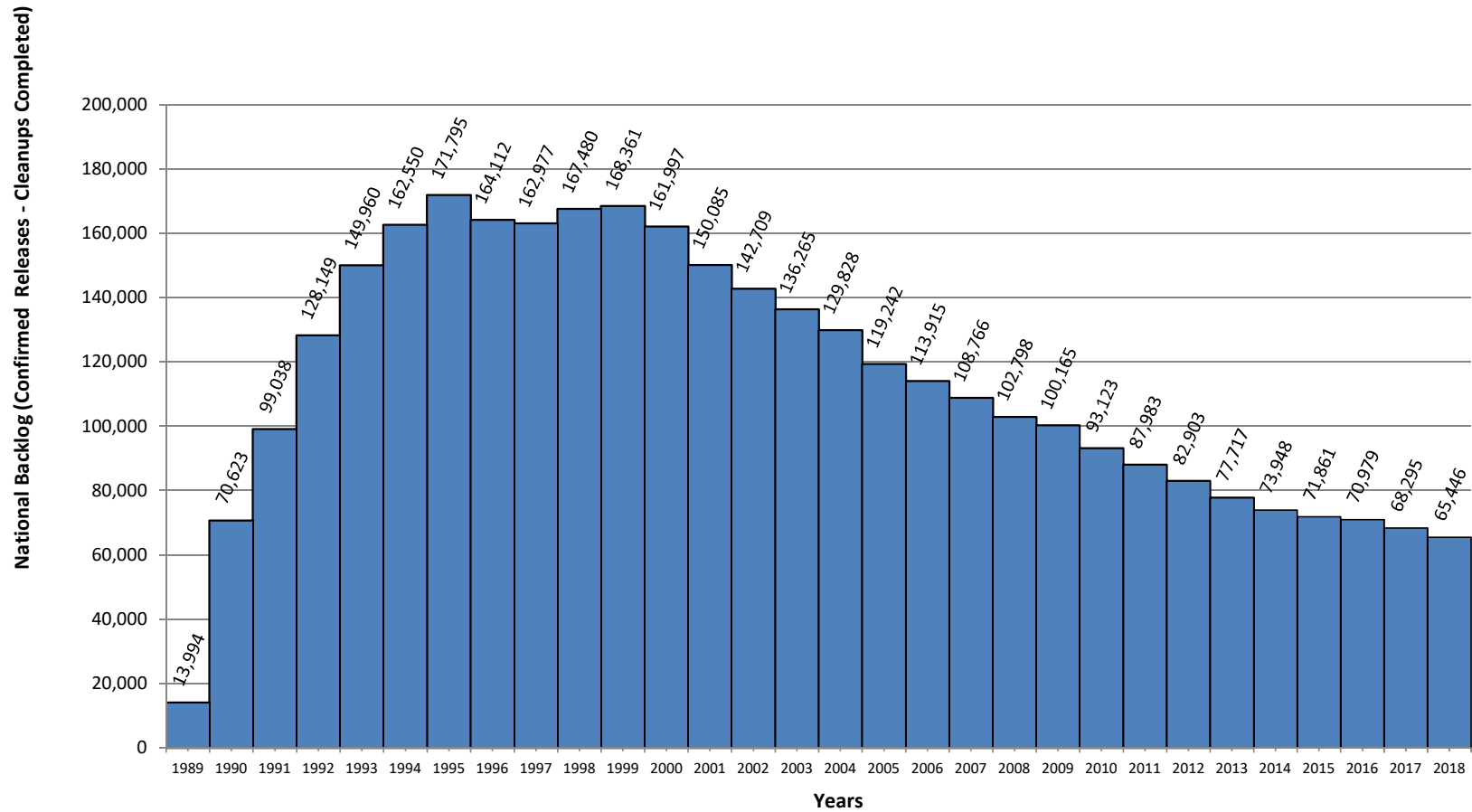
UST Corrective Action Measures for End-of-Year FY 2018 (Data through September 30, 2018)

| 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 | 6 | 0 | 1 | 1 | 0 | 1 | 0 |
| REGION 2 | 161 | 51 | 0 | 7 | 7 | 1 | 7 | 0 |
| REGION 3 | N/A ¹ | N/A ¹ | N/A ¹ | N/A ¹ | N/A ¹ | N/A ¹ | N/A ¹ | N/A ¹ |
| REGION 4 | 68 | 77 | 0 | 16 | 16 | 0 | 10 | 6 |
| REGION 5 | 441 | 1,066 | 1 | 254 | 229 | 2 | 184 | 70 |
| REGION 6 | 391 | 321 | 1 | 70 | 70 | 1 | 67 | 3 |
| REGION 7 | 80 | 99 | 0 | 22 | 22 | 2 | 15 | 7 |
| REGION 8 | 517 | 2,171 | 4 | 555 | 544 | 5 | 440 | 115 |
| REGION 9 | 574 | 1,488 | 2 | 303 | 300 | 4 | 255 | 48 |
| REGION 10 | 412 | 1,169 | 3 | 196 | 195 | 1 | 187 | 9 |
| SUBTOTAL | 2,657 | 6,448 | 11 | 1,424 | 1,384 | 16 | 1,166 | 258 |
| NATIONAL TOTAL | | | | | | | | |
| | Active Tanks | Closed Tanks | Confirmed Releases | | Cleanups Initiated | Cleanups Completed | | Cleanups Remaining |
| | | | Actions This Year | Cumulative | | Actions This Year | Cumulative | |
| NATIONAL TOTAL | 550,379 | 1,871,148 | 5,654 | 543,812 | 522,801 | 8,128 | 478,366 | 65,446 |

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>

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

**UST National Backlog:
FY 1989 Through End-of-Year
FY 2018**



**UST Compliance Measures for End-of-Year FY 2018
(October 1, 2017 - September 30, 2018)**

| 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 | 89% | 89% | 82% |
| MA ² | DNA | DNA | DNA |
| ME | 93% | 88% | 87% |
| NH | 63% | 55% | 38% |
| RI ¹ | 65% | 55% | 46% |
| VT ¹ | 84% | 81% | 78% |
| SUBTOTAL | 82% | 78% | 70% |
| TWO | | | |
| NJ | 96% | 96% | 93% |
| NY | 81% | 73% | 69% |
| PR | 66% | 79% | 65% |
| VI | 100% | 75% | 75% |
| SUBTOTAL | 84% | 81% | 76% |
| THREE | | | |
| DC | 98% | 92% | 92% |
| DE | 97% | 97% | 96% |
| MD | 87% | 91% | 82% |
| PA | 80% | 82% | 69% |
| VA | 85% | 74% | 68% |
| WV | 91% | 86% | 82% |
| SUBTOTAL | 84% | 81% | 72% |

| 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 | 89% | 73% | 66% |
| FL ¹ | 87% | 72% | 66% |
| GA | 72% | 66% | 57% |
| KY | 79% | 81% | 68% |
| MS | 80% | 78% | 68% |
| NC | 71% | 63% | 56% |
| SC | 84% | 80% | 70% |
| TN | 92% | 89% | 77% |
| SUBTOTAL | 80% | 73% | 64% |
| FIVE | | | |
| IL ¹ | 76% | 70% | 63% |
| IN | 84% | 85% | 80% |
| MI ¹ | 85% | 61% | 57% |
| MN | 84% | 84% | 80% |
| OH ¹ | 88% | 71% | 67% |
| WI ¹ | 83% | 67% | 61% |
| SUBTOTAL | 83% | 72% | 67% |
| SIX | | | |
| AR | 75% | 76% | 64% |
| LA | 85% | 83% | 76% |
| NM | 90% | 95% | 86% |
| OK | 84% | 57% | 53% |
| TX | 95% | 93% | 91% |
| SUBTOTAL | 90% | 86% | 82% |

These compliance rates indicate the percent of recently-inspected facilities in significant operational compliance (SOC) with federal UST requirements from 10/1/17 through 9/30/18. 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 MA and MP (CNMI) were unable to report SOC for End-of-Year FY2018.

**UST Compliance Measures for End-of-Year FY 2018
(October 1, 2017 - September 30, 2018)**

| 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 | 80% | 65% | 55% |
| KS | 56% | 87% | 51% |
| MO ¹ | 79% | 94% | 74% |
| NE ¹ | 82% | 77% | 69% |
| SUBTOTAL | 75% | 82% | 63% |
| EIGHT | | | |
| CO | 88% | 78% | 76% |
| MT | 97% | 95% | 92% |
| ND | 91% | 93% | 86% |
| SD | 81% | 84% | 66% |
| UT | 91% | 88% | 82% |
| WY | 97% | 97% | 94% |
| SUBTOTAL | 90% | 86% | 81% |
| NINE | | | |
| AS | 100% | 67% | 67% |
| AZ | 93% | 77% | 71% |
| CA | 81% | 69% | 60% |
| GU | 93% | 87% | 87% |
| HI | 99% | 88% | 84% |
| MP ² | DNA | DNA | DNA |
| NV | 91% | 84% | 76% |
| SUBTOTAL | 84% | 72% | 64% |

| 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 | 83% | 82% | 76% |
| ID ¹ | 89% | 79% | 70% |
| OR | 93% | 90% | 85% |
| WA | 90% | 88% | 80% |
| SUBTOTAL | 90% | 87% | 79% |
| INDIAN COUNTRY | | | |
| REGION 1 | DNA ³ | DNA ³ | DNA ³ |
| REGION 2 | 76% | 73% | 73% |
| REGION 3 | N/A ⁴ | N/A ⁴ | N/A ⁴ |
| REGION 4 | 100% | 50% | 50% |
| REGION 5 | 79% | 64% | 64% |
| REGION 6 | 93% | 89% | 82% |
| REGION 7 | 10% | 50% | 10% |
| REGION 8 | 72% | 77% | 62% |
| REGION 9 | 95% | 88% | 86% |
| REGION 10 | 92% | 90% | 82% |
| SUBTOTAL | 83% | 79% | 72% |
| NATIONAL TOTAL | | | |
| TOTAL | 83.8% | 77.7% | 70.3% |

These compliance rates indicate the percentage of recently-inspected facilities in significant operational compliance (SOC) with federal UST requirements from 10/1/17 through 9/30/18. 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 MA and MP (CNMI) were unable to report SOC for the End-of-Year FY2018.

³ DNA = Data Not Available because no inspections were conducted within the last 12 months.

⁴ 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.

FLORIDA

Release Prevention: Spill

- Single-walled spill buckets integrity testing started in Jan 2018.

Release Prevention: Overfill Prevention

- Overfill protection devices initial operability testing started in Jan 2018.
- Ball float valves could not be installed or replaced after Jan 2017.

Release Detection:

- Begin monthly release detection for emergency generator tanks & piping immediately if installed after Jan 2017.
- Annual operability test of ATG & sensors was always a requirement.
- Groundwater & vapor monitoring, plus SIR are not allowed unless approved by FDEP.

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 EPA Act 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.

OHIO

Release Prevention: Spill and Overfill Prevention

- New UST systems must be equipped with spill and overfill prevention even if they receive less than 25 gallons at a time.

Release Prevention: Cathodic Protection

- Adding internal lining to existing USTs is prohibited for purpose of CP and requires manufacturer approval if done for any other purpose.

Release Detection: Required Methods

- Groundwater and vapor monitoring may not be used for release detection unless given written approval.
- SIR may not be used to meet release detection requirements for piping or tank tightness testing requirements.

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 2 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 End-of-Year FY 2018 (October 1, 2017 - September 30, 2018)**

| Region / State | Number of On-Site Inspections Conducted | Number of Delivery Prohibition Actions |
|-----------------|---|--|
| ONE | | |
| CT | 503 | 70 |
| MA | 1034 | 0 |
| ME | 949 | 0 |
| NH | 365 | 5 |
| RI | 231 | 0 |
| VT | 310 | 35 |
| SUBTOTAL | 3,392 | 110 |
| TWO | | |
| NJ | 1,144 | 154 |
| NY | 2,961 | 1 |
| PR | 333 | 0 |
| VI | 29 | 2 |
| SUBTOTAL | 4,467 | 157 |
| THREE | | |
| DC | 52 | 0 |
| DE | 134 | 1 |
| MD | 919 | 7 |
| PA | 3,205 | 36 |
| VA | 1,977 | 5 |
| WV | 531 | 6 |
| SUBTOTAL | 6,818 | 55 |

| Region / State | Number of On-Site Inspections Conducted | Number of Delivery Prohibition Actions |
|-----------------|---|--|
| FOUR | | |
| AL | 2,510 | 64 |
| FL | 3,600 | 0 |
| GA | 3,334 | 0 |
| KY | 1,881 | 72 |
| MS | 1,132 | 195 |
| NC | 3,335 | 269 |
| SC | 3,515 | 574 |
| TN | 2,057 | 39 |
| SUBTOTAL | 21,364 | 1,213 |
| FIVE | | |
| IL | 3,216 | 792 |
| IN | 719 | 1 |
| MI | 2,263 | 113 |
| MN | 806 | 9 |
| OH | 2,694 | 0 |
| WI | 2,888 | 145 |
| SUBTOTAL | 12,586 | 1,060 |
| SIX | | |
| AR | 1,299 | 62 |
| LA | 1,280 | 24 |
| NM | 428 | 1 |
| OK | 3,388 | 87 |
| TX | 6,331 | 684 |
| SUBTOTAL | 12,726 | 858 |

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 End-of-Year FY 2018 (October 1, 2017 - September 30, 2018)**

| Region / State | Number of On-Site Inspections Conducted | Number of Delivery Prohibition Actions |
|-----------------|---|--|
| SEVEN | | |
| IA | 1,057 | 21 |
| KS | 1,183 | 30 |
| MO | 713 | 1 |
| NE | 1,527 | 0 |
| SUBTOTAL | 4,480 | 52 |
| EIGHT | | |
| CO | 829 | 28 |
| MT | 391 | 14 |
| ND | 330 | 0 |
| SD | 435 | 0 |
| UT | 958 | 8 |
| WY | 326 | 3 |
| SUBTOTAL | 3,269 | 53 |
| NINE | | |
| AS | 6 | 0 |
| AZ | 608 | 9 |
| CA | 13,569 | 201 |
| GU | 16 | 0 |
| HI | 118 | 0 |
| MP | 8 | 0 |
| NV | 932 | 12 |
| SUBTOTAL | 15,257 | 222 |

| Region / State | Number of On-Site Inspections Conducted | Number of Delivery Prohibition Actions |
|-----------------------|---|--|
| TEN | | |
| AK | 146 | 5 |
| ID | 387 | 1 |
| OR | 409 | 43 |
| WA | 1,182 | 6 |
| SUBTOTAL | 2,124 | 55 |
| INDIAN COUNTRY | | |
| REGION 1 | 0 | 0 |
| REGION 2 | 33 | 0 |
| REGION 3 | N/A ¹ | N/A ¹ |
| REGION 4 | 8 | 0 |
| REGION 5 | 76 | 0 |
| REGION 6 | 44 | 0 |
| REGION 7 | 10 | 0 |
| REGION 8 | 60 | 0 |
| REGION 9 | 99 | 0 |
| REGION 10 | 51 | 0 |
| SUBTOTAL | 381 | 0 |
| TOTAL | | |
| | 86,864 | 3,835 |

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.

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